

Report

Cabinet

Part 1

Date: 13 September 2023

Subject Replacement Local Development Plan (RLDP) – Preferred Strategy

Purpose To update Cabinet on the consultation exercise and endorse the Council's response in relation to the Growth and Spatial Options which has been used to inform the Preferred Strategy Consultation Document. Cabinet approval is sought to endorse commencement of the formal public consultation on the Preferred Strategy Consultation Document, as the next formal step in the preparation of the draft Replacement Local Development Plan (RLDP).

Author Planning Policy Manager

Ward All

Summary Undertaking a consultation on a Preferred Strategy (Pre-Deposit Plan) document is a statutory stage in developing the Replacement Local Development Plan. The Preferred Strategy proposals have been informed by engagement with communities, including consultation on growth and spatial options, and technical work, for example the Integrated Sustainability Appraisal.

A first revision of the Delivery Agreement was endorsed by Cabinet in January 2023. The Delivery Agreement targets a Preferred Strategy Consultation for Autumn 2023.

It is proposed that the Preferred Strategy consultation document is taken forward for public consultation alongside supporting assessments and background papers.

Proposal Cabinet is asked to:

1. **Note the comments on the Growth and Spatial Options (GSO) and endorse the responses provided in Appendix A.**
2. **Endorse the Preferred Strategy consultation paper, provided in Appendix B, and recommend to Council that a formal community consultation is commenced.**

Action by Planning and Development Manager / Head of Regeneration and Economic Development

Timetable Immediate

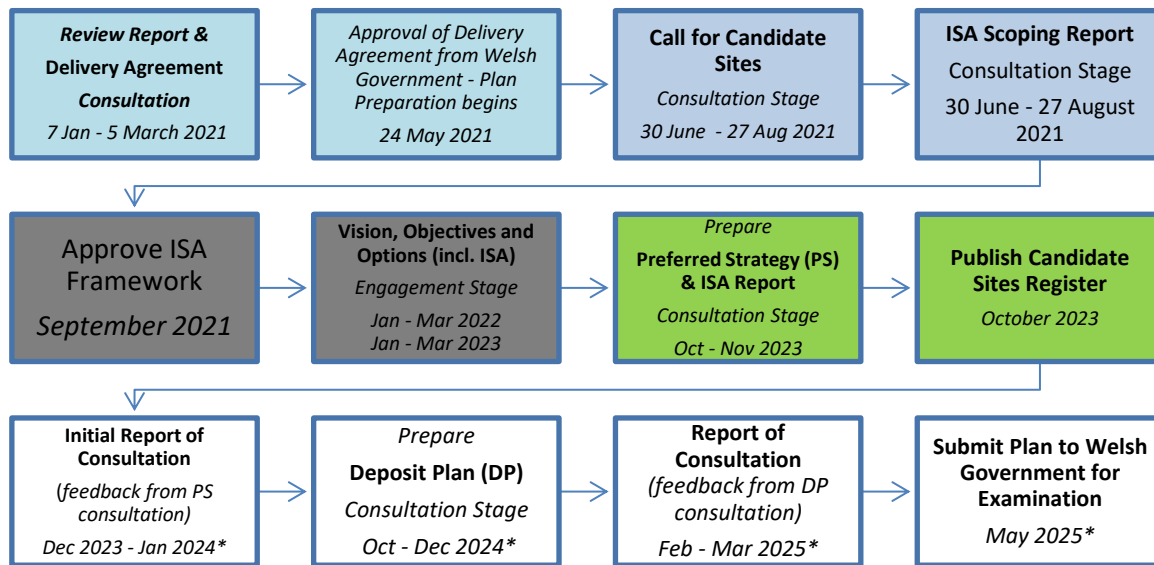
This report was prepared after consultation with:

- Head of Finance
- Head of People, Policy and Transformation
- Head of Law and Standards

Signed

Background

There are many formal stages to the preparation of a RLDP and these key stages are set out below¹:



**Dates are approximate and have been updated to reflect the proposed revision to the Delivery Agreement*

We are currently at the stages highlighted in green – ‘Preferred Strategy (PS) and Integrated Sustainability Appraisal Report (ISA)’ and ‘Publish Candidate Sites Register’. Most recently engagement on the RLDP’s Growth and Spatial Options (GSO) was undertaken during early 2023. Prior to this, consultation on the draft Vision, Issues and Objectives was undertaken in early 2022. The feedback from this earlier consultation was reported to Cabinet in July 2022. Following the close of the GSO consultation, officers have considered the comments received to further refine and determine which growth and spatial options are emerging as the most appropriate for Newport over the period 2021-2036.

Growth and Spatial Options Consultation

Stakeholder engagement is a critical element of the preparation of any Development Plan. Therefore, in addition to the standard formal consultation (direct communication with those on the RLDP database and updates to the Council website) a series of engagement events were undertaken by Planning Aid Wales on behalf of the Council.

Consultation Feedback and Response

The Council directly received 68 formal written responses, each of the representations received are set out in full, alongside the recommended Council response to the comments, in Appendix A of this report.

The purpose of this consultation was to gain views regarding the different growth and spatial options. **Table 1** illustrates the growth options which formed the basis of the consultation, for completeness.

Table 1: Options Taken Forward from the Demographic Report

Option	Description	Dwellings		Jobs	
		Per annum	Overall scale	Per annum	Overall scale
1. Dwelling-led 5YR	Models the population impact of an average annual dwelling growth of +838 dwellings per annum (dpa), based on a 5-year history of pre-COVID-19 housing completions in Newport (2015/16–2019/20).	838	12,570	863	12,945
2. WG-2018-HIGHPOP	Replicates the Welsh Government 2018-based high population projection, rebased to the 2021 Census	632	9,480	713	10,695

¹ The term ISA refers to the Integrated Sustainability Appraisal

	population figure and incorporating high fertility, mortality and migration assumptions.				
3. Dwelling-led 10YR	Models the population impact of an average annual dwelling growth of +638 dpa, based on a 10-year history of pre-COVID-19 housing completions in Newport (2010/11–2019/20).	638	9,570	576	8,640
4. WG-2018-Principal	Replicates the Welsh Government 2018-based Principal population projection, using historical population data for 2001–2018.	530	7,950	627	9,405
5. PG-Long Term	Uses an ONS 2020 MYE base year and calibrates its migration assumptions from a 19- year historical period (2001/02–2019/20).	540	8,100	448	6,720
6. Employment-led OE+D&I Uplift	Models the population impact of an average annual employment growth of +389 per year over the plan period, with an uplift applied to the OE economic forecast, based on the Cardiff Capital Region (CCR) city deal direct and indirect employment projections.	507	7,605	389	5,835

Comments received regarding the growth options are summarised in **Table 2**. From **Table 2**, broad conclusions can be drawn that options 1, 2 and 3 are accepted as making a contribution towards Newport’s role within the Cardiff, Newport and the Valleys National Growth Area, and that options 4, 5 and 6 would not meet the needs of a growing population (as confirmed in the 2021 census).

Table 2: Summary of Comments Received on Growth Options		
Stakeholder Type	General Comments on Growth Strategy	Comments on Options
Statutory Bodies	<ul style="list-style-type: none"> Development should be located where it can be served by existing or planned water infrastructure. Not enough regard for historic assets and landscapes Further clarification that historic assets, including buried archaeological remains and built heritage should be preserved in situ as a priority. Support for approach taken which assess the scenarios against RLDP objectives. There is concern that not enough consideration of growth in terms of a Well-being Economy as per Future Wales, is within the GSO. Consideration of Flood Risk, Protected Species, Protected Sites, and Green Infrastructure should be reiterated. 	<p>Growth Option 6 Employment-led OE+D&I Uplift</p> <ul style="list-style-type: none"> Opposition as it is considered that this would result in a low growth strategy and not align with Future Wales.
Agent / Developers / Landowners	<ul style="list-style-type: none"> Support for disregarding lowest options. Flexibility buffer should be well above the 12% incorporated by the adopted LDP. Opposition against the matrix used to assess some of the impacts e.g. health and wellbeing. If there are concerns from Welsh Government regarding the high level of housing growth proposed in the Monmouthshire LDP, then Newport, as somewhere within a National Growth Area, should be a focal point. Some belief that anything delivering below the current 690 dwellings per annum should not be considered. 	<p>Growth Option 1 Dwelling-led 5YR</p> <ul style="list-style-type: none"> Support as it reflects national role. Support as it fulfils Future Wales. Minority view that only this option would reflect the status of Newport as part of the National Growth Area. While most accept 1, 2, and 3 as viable options. <p>Growth Option 2 WG-2018-HIGHPOP</p> <ul style="list-style-type: none"> Support as it is rebased on 2021 census, using 2018 projections and findings of the 2021 Census. Further uplift based on recent fertility, mortality, and migration trends. <p>Growth Option 3 Dwelling-led 10YR</p> <ul style="list-style-type: none"> Support on the basis that it provides a longer term view of historic trends, smoothing out peaks and troughs in the levels of development activity. <p>Growth Option 4 WG-2018-Principal</p> <ul style="list-style-type: none"> Opposition as it is not rebased on 2021 census, using 2018 projections. <p>Growth Option 5 PG-Long Term</p> <ul style="list-style-type: none"> Opposition as growth hasn’t been uplifted based on recent fertility, mortality, and migration trends. <p>Growth Option 6 Employment-led OE+D&I Uplift</p> <ul style="list-style-type: none"> Opposition as growth hasn’t been uplifted based on recent fertility, mortality, and migration trends.

Community Councils	<ul style="list-style-type: none"> Concerns regarding development on Levels and St Brides and Peterstone. 	
Neighbouring Authorities	<ul style="list-style-type: none"> Consideration should be given to potential need to relook at scenarios subject to 2021 census. Need for understanding general regional picture. 	
General Consultation Bodies	<ul style="list-style-type: none"> Some support for two lowest options as least damaging on biodiversity and climate change. Others have given no specific comments other than confirming that growth should be determined in line with the environmental capacity of the plan area to accommodate the growth. Minority view that no support should be given to any options due to the above impact. Continue delivering a steady and adequate supply of raw materials, and ensuring infrastructure is safeguarded. To ensure growth and deliver high quality homes. 	
Other (including Members of the public, unspecified organisations and political representatives)	<ul style="list-style-type: none"> Evidence of parallel with current LDP supporting a high housing led growth strategy with a growing deprivation in Newport as a whole. Support for disregarding lowest options. Some support of highest level of growth will need to be set in order to meet the Vision and fulfil the strategic aspirations for Newport as a Gateway City to Wales. Mixed views on where outskirt development should and shouldn't be. Mixed views on whether only brownfield sites or a combination of brownfield and greenfield sites should be considered. Support for the aim of reopening Caerleon Railway Station. Population led but needs to be higher. Employment led is not appropriate due to the transient role of the city. 	<p>Growth Option 1 Dwelling-led 5YR</p> <ul style="list-style-type: none"> Support as the main option to focus on due to being able to fulfil Future Wales and reflects national role. <p>Growth Option 2 WG-2018-HIGHPOP</p> <ul style="list-style-type: none"> Most likely to achieve sustainable growth over the whole plan period and, appears at this stage of analysis, to imply the most positive outcomes and the least negative outcomes. <p>Growth Option 3 Dwelling-led 10YR</p> <ul style="list-style-type: none"> Minor support due to it having the most positive responses to the objectives set, but understood that the downside would be fewer housing completions and potentially less employment opportunities.

Four spatial options were consulted on, these were:

- Previously Developed Land (PDL) Led:** A PDL led approach would constitute a continuation of the current spatial strategy, focusing growth on previously developed land. It would require high density development within the urban boundary and would need to explore the reuse of declining employment or industrial land for either housing or new types of employment uses. Under this option the use of greenfield land should be avoided as far as possible.
- Urban Extension:** the identification of land on the edge of the urban boundary. This is likely to constitute a substantial amount of greenfield growth and it is unclear whether land-based constraints would restrict the scale of growth.
- Village Focus:** direct housing development towards the nine defined villages of Castleton and Marshfield; St Brides; Bishton; Llanwern; Underwood; Llanvaches; Parc Seymour and Christchurch. Some villages are more constrained than others and as a result less constrained villages would support a high proportion of growth under this scenario. Directing development towards villages alone is likely to result in a high amount of greenfield land consumption and is unlikely to support a higher scale of growth due to land availability and the level of existing services and facilities.
- Hybrid Approach:** include a mix of previously developed land, sites on the edge of the urban boundary and sites at and surrounding existing villages. This strategy would be able to draw upon the spatial benefits of the other options, but it could be difficult to balance growth across this option.

Table 3 provides a summary of comments received. From these, broad conclusions can be drawn that a mixed approach of directing development towards Previously Developed Land (PDL), the edge of the urban area and small development at some villages is the most appropriate. Although the principle of maximising the redevelopment of PDL was supported, concerns were raised around relying on these sites, particularly smaller sites for the delivery of new homes as the number of readily available PDL sites is reducing. There is encouragement for the protection of the Gwent Levels and rural communities located within the area. A village focus is discouraged, with some concerns raised regarding the services and facilities of rural communities under this scenario. Concern over the risk of coalescence between the urban area and villages under an urban expansion led scenario were also raised.

Table 3: Summary of Comments Received on Spatial Options		
Stakeholder type	General Comments on Spatial Strategy	Comments on Options
Statutory Bodies	<ul style="list-style-type: none"> Development could be affected by flooding from the sea, rivers, and areas prone to surface water flooding. Potential for development in areas that have the potential for wildfires. Sites should be near existing or planning water infrastructure services where possible. Hydraulic modelling may need to be conducted. Consideration for development in relation to National Grid, Flood Risk, Protected Species, and Protected sites. Utilising active travel more, accessibility / connectivity to public transport, air quality management, and more community connectedness. 	<p>Urban Expansion</p> <ul style="list-style-type: none"> Potential for undue pressure on the preservation of historic assets within the countryside due to the high levels of growth required. <p>Village Growth</p> <ul style="list-style-type: none"> Any village focus will need to take into consideration the need for respective wastewater treatment works to have the capacity or potential capacity to deal with the prospective growth.
Agent / Developers / Landowners	<ul style="list-style-type: none"> Some developers believe that a “new settlement” should be considered. With the area around St Brides, being identified by a developer for a new village. Minority of developers think that the lack of the long list of candidate sites being public limits the ability of the general public to assess and scrutinise the sites and the council decisions. Consideration for impact of updated TAN 15. Criticism of “traffic light” approach. 	<p>Previously Developed Land</p> <ul style="list-style-type: none"> Mixed views on whether PDL-led approach is the best. Some view PDL-led approach will not be possible as there is not enough PDL land to implement it. Some view that PDL-led development is utilising land the best and is a natural continuation of the previous LDP. Majority view though that PDL allocations in the adopted LDP where development has not commenced should continue to be supported through a positive allocation but should not be relied upon to meet the housing requirement. Majority view that no PDL allocations should be made on sites with capacity for less than 50 homes. These should be allowed to come forward as windfall sites Majority view that new PDL allocations in excess of 50 homes that are counted towards meeting the housing requirement should only be made where it has been demonstrated that these are viable. <p>Urban Expansion</p> <ul style="list-style-type: none"> Majority of developers view that while there should be a hybrid approach, it should be with an urban expansion focus. This urban expansion should be sustainable in nature (following “Building Better Places” principle). Expanding Llanwern, Langstone, and Bettws being an example of this, High Cross, Rhiwderin, Pentrepoeth, Rogerstone, and Newport Golf Club to a lesser extent. Minority of developers think that it should be an urban expansion only. <p>Village Growth</p> <ul style="list-style-type: none"> Minority of developers think Village led approach would be preferable. Castleton and Marshfield being most preferred due to have the most services currently. Christchurch to a lesser extent. <p>Hybrid</p> <ul style="list-style-type: none"> Majority developers view that a hybrid approach of all three is the most pragmatic. Mix of urban and rural land use for development. A smaller developer wants a scattered growth option, many smaller sites around the City. A small developer sees that the hybrid option is low risk and can help deliver a balanced supply along with a balanced distribution.
Community Councils	<ul style="list-style-type: none"> Marshfield Community Council concerned with many current spatial issues in Marshfield, considers Marshfield as an unsustainable area and any more development that isn't a net increase in services, amenities, and infrastructure would be resisted. 	<p>Previously Developed Land</p> <ul style="list-style-type: none"> Marshfield Community Council would prefer development on brownfield sites. <p>Urban Expansion</p> <ul style="list-style-type: none"> Green wedge protection needed between the proposed new train station at St Mellons and Marshfield. <p>Village Growth</p> <ul style="list-style-type: none"> Suggestion of prohibiting granting of planning consent for new builds in areas where the community has been categorised as “unsustainable.” Some community councils against the idea of Peterstone and St Brides being developed.
Neighbouring Authorities	<ul style="list-style-type: none"> Torfaen Council considers that there is a lack of information on specific candidate sites and as such cannot comment. 	<p>PDL-Led</p> <ul style="list-style-type: none"> Support for maximising development of PDL. <p>Hybrid</p> <ul style="list-style-type: none"> Hybrid approach is the most appropriate, focusing on PDL and village focus.

<p>General Consultation Bodies</p>	<ul style="list-style-type: none"> • Green growth should be the focus and this should be in harmony with tackling the diversity and Climate Change crisis. • Supporting spatial options that can be served effectively by public transport, this is more difficult if developed away from proposed or current public transport options. • “New settlement” is a worthy consideration. • Lack of the long list of candidate sites being public limits the ability of the general public to assess and scrutinise the sites and the council decisions. 	<p>PDL-Led</p> <ul style="list-style-type: none"> • PDL-led approach will not be possible as there is not enough PDL land to implement it. <p>Hybrid</p> <ul style="list-style-type: none"> • Scattered growth option supported, many smaller sites around the City.
<p>Other (including Members of the public, unspecified organisations and political representatives)</p>	<ul style="list-style-type: none"> • A lot of support for protection of Gwent Levels. • Sites to include more circular footpaths and cycle paths around the periphery of any new estates. • Disappointed at the previous removal of 5-6 village boundaries that are included in the current urban boundary. • Indicated some interest for self-build plots in some of the villages in the City. • Support from the public that any spatial options should consider a prospective Caerleon train station as part of any future development. • Concerns Climate change is going to have a major impact on development in the City of Newport. 	<p>PDL-Led</p> <ul style="list-style-type: none"> • Strong support for the continuation of the PDL-led approach. • Some understanding that PDL-led approach may be limited. • PDL is considered most appropriate by most of the public. Especially to avoid village focus. <p>Urban Expansion</p> <ul style="list-style-type: none"> • Coalescence of villages and the city of Newport should be avoided. <p>Village Growth</p> <ul style="list-style-type: none"> • Some outright objection to village focus. • Langstone needs a local or district centre. With services and amenities such as a small market, doctor’s surgery, barbers, and more things for children and new families including a school. • The Gorelands and Catsash Road area would be perfect for a new school. • Rogerstone, Rhiwderin, and Bassaleg areas are considered to be not preferable due to lack of services and with general overdevelopment in the area over the years. • Biodiversity should be maintained and all non-statutory and statutory habitat sites protected. <p>Not enough services and amenities in Penhow or other villages (most if not all are volunteer run).</p> <p>Hybrid</p> <ul style="list-style-type: none"> • Some acceptance that a hybrid approach will be needed, but that it should be sustainable development. PDL alone is not practical, therefore some urban expansion and village settlement growth will need to be a part of it. • Important to address tenure and dwelling type and mix, placemaking, and the role of community engagement and community led housing development. • Some members of the public consider a hybrid approach of all three being the most pragmatic. With repurposing more city centre sites for housing to have an eclectic mix of living and business / commercial. • Transport issues being the key part to decision making if commuting by car is not to increase.

The engagement events undertaken by Planning Aid Wales (PAW) gave the opportunity for attendees to learn about the RLDP process, specifically the Growth and Spatial Options. Across ten events, comprising both in person and online formats, 135 stakeholders participated in these events. The feedback received focused on the Growth Options, Employment Land and Spatial Options presented in the published consultation paper.

Many useful comments were made and have informed the recommendations to Cabinet e.g. general acceptance that Newport needs to grow, recognised need for housing and employment land whilst balancing environmental and infrastructure constraints at the same time, no objection to the shortlist of growth scenarios and the objectives to test them against, no disagreement with the proposed employment land to take forward, questioned whether employment needs could be met with regeneration of the city centre, hybrid spatial option considered most appropriate by the majority but there was also significant support for the PDL option, no alternative spatial options recommended, both the growth and spatial options presented needed more detailed testing moving forward. Detailed notes were taken at each event to collate the key issues raised, and these will be considered where relevant in the preparation of the RLDP. PAW has provided a report outlining the events and feedback received, a summary is also provided. These can be viewed in Appendix A of this report.

Next Steps

The next formal stage of preparing the Replacement Local Development Plan is to publish a Preferred Strategy. This outlines the housing and job growth requirements that the Local Development Plan will seek to achieve. To reach this stage, the Council has undertaken more than two years of evidence gathering and undertaken two informal consultations on key aspects of the Local Development Plan in the Vision, Issues and Objectives and the Growth and Spatial Strategies. The full Preferred Strategy Consultation Paper can be found in Appendix B.

The following table outlines the background documents that inform and support the Preferred Strategy (available using hyperlinks below):

Table 4: Background Papers
Regional Evidence Base Documents
Larger than Local Employment Study, BE Group, April 2020
Regional SFCA Stage 1 Report, JBA, November 2022
Regional Renewable and Low Carbon Energy Report, Carbon Trust, December 2020
Local Evidence Base Documents
Other Documents for Consultation
Candidate Sites Register
Initial Integrated Sustainability Appraisal Report
Habitats Regulations Assessment Screening Report
Technical Evidence Base Documents
Demographic Study, Edge Analytics, September 2022
Employment Land Review, BE Group, February 2022
Retail and Leisure Study 2019, Nexus, July 2019
Retail and Leisure Study Addendum, Nexus, July 2023
Urban Capacity Study, Lambert Hampton Smith, April 2022
Housing Supply Review, Lambert Hampton Smith, April 2022
Newport Renewable and Low Carbon Energy Report, Carbon Trust, December 2020
Green Infrastructure Assessment, CBA, February 2022
Newport Limestone Aggregate Resource Assessment, June 2023
Topic Based Background Papers
Candidate Site Assessment Report
Employment Land Background Paper
Spatial Strategy and Urban Boundary Review
Formulating the Growth Strategy
Settlement Assessment (Village Appraisal)
Housing Supply Background Paper
Retail and Leisure Background Paper
Health Background Paper
Climate Change Background Paper
Waste Background Paper
Transport Background Paper
Minerals Background Paper
Renewable Energy Background Paper
Flood Risk Background Paper
Historic Environment Background Paper
Green Infrastructure and Biodiversity Background Paper
Issues, Vision and Objectives Background Paper
Community Facilities and Planning Obligations Background Paper

To formally progress a Preferred Strategy another stage of consultation is required. The consultation on this must be legally compliant and the process is set out within Regulations 15 and 16 of The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended). The Regulations stipulate that the consultation documents must be made available online at the Council's principal office and any other locations as the Local Planning Authority deem appropriate; provide a statement of fact outlining which documents are available for inspection and the place and times they can be inspected; representations can be made by anyone and must be sent to the address outlined in the statement of fact;

consultation must last at least 6 weeks; and representations received must be considered before finally determining the content of the Deposit Plan.

Contents of the Preferred Strategy

In summary, the Preferred Strategy document for consultation (found in Appendix B) indicates the overarching strategy for 9,570 new homes and 8,640 new jobs to achieve the Vision of Newport as a destination where people want to live, work and visit. These are to be delivered on a mix of previously developed land and greenfield sites within and adjoining the main settlement, with some, smaller scale development occurring at villages with defined limits of development (settlement boundaries). This approach promotes the reuse and redevelopment of previously developed land, new growth in appropriate locations and new development in more rural locations to sustain local communities. The plan-led planning system requires the identification of development sites to deliver the strategy. Key sites have been distinguished from the Candidate Sites, submitted to the Council by proposers in August 2021. These are sites over a 300 dwelling threshold and strategic employment sites. This threshold has been used as it is these sites which are likely to make the biggest contribution to delivering placemaking objectives.

The Preferred Strategy responds and addresses the national, regional and local context; economic, environmental, social and cultural issues; the RLDP vision; and RLDP objectives set out within chapters 2, 3, 4 and 5. The delivery of the Preferred Strategy is underpinned by a number of strategic policies, the delivery of the associated objectives and subsequent aims of these will be supported by development management policies and associated Supplementary Planning Guidance. Draft strategic policies are set out within Chapter 8, while the extent of proposed changes to development management policies are set out within Chapter 9.

In line with the Council's Delivery Agreement for the Replacement Local Development Plan, the Preferred Strategy consultation will include the publication of the Initial Integrated Sustainability Appraisal (ISA) Report and the Habitats Regulation Assessment Screening Report. These are available using the hyperlinks in Table 4 above. These are important documents, required by legislation, which assess the impacts of Local Development Plan proposals on a range of factors to ensure that no significant adverse effects arise on either the ISA objectives set out with the ISA Framework or on designated sites under the Habitats Regulations. The Council is obligated to accept any additional Candidate Sites submitted during the Preferred Strategy consultation, as such the Call for Candidate Sites will be reopened and associated guidance updated to inform this process.

Financial Summary (Capital and Revenue)

The RLDP process has a project specific budget to cover costs of all resources associated, including additional staff, consultations, commissions, examination processes etc. The resources required for the RLDP process are set out in the Delivery Agreement. The table below sets out an estimated cost for the RLDP which has been based on the previous LDP and neighbouring authority costs. The table identifies a potential residual sum remaining at the end of RLDP process, however it should be noted that the estimates used are on the cautious side. There are some implications to the budget as a result of extending the timeline of delivery to early 2026. Underspend during the previous year (Year 2) relates to project delays and less than anticipated expenditure on staff, resulting from the team not being at full capacity since the RLDP process began. An accurate cost has been identified under the current year and a fifth year has been forecast. These indicate that the delay can be managed within the project budget. We will continue to monitor and mitigate as the plan review progresses.

	Year 1 (Start RLDP 2021/22) Actual £	Year 2 2022/23 Actual £	Year 3 2023/24 £	Year 4 2024/25 £	Year 5 2025/26 £	Notes including budgets heads affected
Staff Costs	63,270	43,934	72,518	75,000	75,000	
Other Costs	126,292	- 2,126	94,086	225,000	180,000	

Funded by:						Costs include estimated additional staff resource on fixed term contracts which will need to be subject to a business case.
Revenue	71,604	71,604	71,604	71,604	71,604	
Budget						
LDP						
Reserve	117,958	0	95,000	228,396	183,396	
Net Costs	0	0	0	0	0	
(Savings)	(0)	(29,796)	(0)	(0)	(0)	
Net Impact on Budget	0	0	0	0	0	
LDP Reserve (£544,354 2023/24)	514,558	544,354	449,354	220,958	37,562	

Risks

Risk	Impact of Risk if it occurs* (H/M/L)	Probability of risk occurring (H/M/L)	What is the Council doing or what has it done to avoid the risk or reduce its effect	Who is responsible for dealing with the risk?
Not endorsing the responses to GSO consultation representations	L	L	The Council has committed to the RLDP process, which includes the Growth and Spatial Strategy. This is the second LDP for Newport and the process is established and understood. It is unlikely that not approving the recommended responses would result in a delay at this stage.	Planning Policy Manager
Not approving the Preferred Strategy for formal consultation	H	L	Consultation on the Preferred Strategy is a formal, statutory stage of plan preparation stipulated by the Town and Country Planning Regulations 2005, as amended. This is essential for building consensus around the growth strategy prior to the publication of a Deposit Plan. The RLDP project is currently running in accordance with the revised Delivery Agreement and not approving the Preferred Strategy could result in slippage against this timetable and further delays to the project overall.	Planning Policy Manager

Links to Council Policies and Priorities

The Local Development Plan is one of the statutory plans the Council has to prepare. The current LDP determines Newport's land use policies to 2026. The LDP covers many topics that impact on other sections of the Council e.g. drainage, tourism, education etc. The Preferred Strategy provides a chapter on national, regional and local context. This section outlines the Council's policies, strategies and priorities, bringing up to date and building upon on the RLDP Review Report published in 2021. In summary, since the LDP's adoption in 2015 there have been a number of significant changes to Council policy which will be of relevance to the RLDP, particularly the Corporate Plan and the Organisational Climate Change Plan. The primary objective of the Corporate Plan is '*a fairer, greener, ambitious Newport for everyone*' and whilst this is not at odds with the aims of the current LDP, a new LDP will help us to better align the four principles: Fair and Inclusive; Empowering; A listening council; and Citizen Focussed within the strategy. As a key document outlining the issues and aspirations of the Council this needs to be reflected in a revised LDP. In addition, there are numerous Council strategies and policies that will influence the LDP e.g. Flood Risk Management Plan, Destination Management Strategy, Economic Growth Plan. A full appraisal of council plans and strategies can be found in Chapter 2 and Appendix 5 of the Preferred Strategy paper and indicated how the Preferred Strategy, particularly the issues, vision and objectives, was informed by current Council policies and priorities.

Options Available and Considered

- 1) Cabinet notes the GSO consultation comments received, endorses the recommended Council responses and recommends that Council approve the Preferred Strategy for consultation.
- 2) Cabinet notes the GSO consultation comments received and provides amendments to the recommended Council response and / or the Preferred Strategy prior to consideration by Council.
- 3) Cabinet notes the GSO consultation comments received and does not endorse the recommended responses and / or recommend Council's approval of the Preferred Strategy for consultation.

Preferred Option and Why

1. For Cabinet to note the GSO consultation comments received, endorse the recommended Council responses and recommend that Council approve the Preferred Strategy for consultation. Consultation on the Preferred Strategy is a formal stage of plan preparation stipulated by the Town and Country Planning Regulations 2005, as amended. This is essential for building consensus around the growth strategy prior to the publication of a Deposit Plan.

Comments of Chief Financial Officer

The report seeks Cabinet approval for the Replacement Local Development Plan (RLDP) Preferred Strategy. The finance table maps out the costs and funding implications for the current and following 2 years.

The report sets out the overall objectives, strategies and key issues for the RLDP. It is essential that the RLDP continues to align with the Council's strategies and priorities, financial objectives, available resources and service requirements.

Currently there are no direct un-afforded financial implications arising from this report with existing budgets and sufficient reserve cover deemed sufficient to meet the current financial implications of undertaking consultation on the Preferred Strategy and preparing the Deposit Plan.

The costs of facilitating the actual RLDP implementation are not considered here, and any significant costs involved would need to be considered as part of future budget setting plans.

Comments of Monitoring Officer

The Council as Local Planning Authority (LPA) has a statutory duty to produce a Local Development Plan (LDP). The LPA's statutory duties under the LDP system are contained within Part 6 of the Planning and Compulsory Purchase Act 2004. The LPA is required under Section 69 of the Planning and Compulsory Purchase Act 2004 to undertake a full review of the adopted LDP at intervals not longer than every 4 years from the date of adoption. The Replacement Local Development Plan (RLDP) has to be prepared in accordance with the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended). There is a formal process to follow and this is described within the body of this Report. The Regulations must be adhered to at each stage so as to avoid the risk of a challenge to the Council's process.

This report confirms that officers have progressed to the Preferred Strategy stage and are now seeking approval to begin public consultation on that document, in accordance Regulations 15 and 16 and with the timetable contained in the Delivery Agreement (required by Regulation 9), which has previously been approved.

Comments of Head of People Policy and Transformation

This report sets out the draft Preferred Strategy for formal public consultation, which will inform the preparation of the draft Replacement Local Development Plan (RLDP) and outlines the housing and job growth requirements that the LDP seeks to achieve. Undertaking a statutory consultation on a Preferred Strategy follows a number of other formal stages over the last two years including informal engagement on the growth and spatial options. The preferred option recommends that Council approve the draft Preferred Strategy for formal consultation to take place later this year.

The draft Preferred Strategy was informed by engaging a range of communities including statutory bodies, agent/developers/landowners, community councils, neighbouring authorities, and members of the public through two informal consultations on the draft Vision, Issues and Objectives (early 2022) and the Growth and Spatial Options (early 2023).

A Fairness and Equalities Impact Assessment (FEIA) was not undertaken for this specific piece of work as the RLDP process incorporates an FEIA within its Integrated Sustainability Appraisal (ISA), with an initial ISA report included as part of the consultation on the Preferred Strategy. The strategy is clearly aligned to the principles of the Well Being of Future Generations Act.

Scrutiny Committee

To be verbally reported.

Fairness and Equality Impact Assessment:

- **Wellbeing of Future Generation (Wales) Act**
- **Equality Act 2010**
- **Socio-economic Duty**
- **Welsh Language (Wales) Measure 2011**

As part of the RLDP work an Integrated Sustainability Appraisal is undertaken. This fulfils the requirements and duties for:

- Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA),
- Equalities Impact Assessment (EqIA),
- Health Impact Assessment (HIA),
- Welsh Language Impact Assessment (WLIA), and
- Well-being of Future Generations (WBFG).

The aim of the ISA is to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts and maximising positive impacts. By undertaking this process, the Council can be confident that the RLDP will be prepared in a manner which clearly considers its impact on these aspects

of fairness and equality. The engagement at each stage is undertaken in line with the agreed Community Involvement Scheme (set out in the approved Delivery Agreement) as approved by Full Council and Welsh Government.

An FEIA has not been undertaken for this specific piece of work as the RLDP process incorporates an FEIA within its ISA process. In terms of the Well-being and Future Generations Act, there is a specific 'health and wellbeing' objective. Every policy/site introduced by the RLDP will need to consider how it will improve the health and wellbeing of residents within Newport and there are five more detailed questions that will need to be addressed.

Similarly with the Equality Act, socio-economic duty and Welsh language measures, the Vision, Issues and Objectives as informed by the ISA framework includes an objective entitled 'Equality, diversity and inclusion'. The objectives are explicit about the role of the plan in achieving this.

In summary, the RLDP has a system of Integrated Sustainability Appraisal work that will go beyond that of an FEIA. Consequently, it is not considered necessary to undertake an FEIA in relation to this specific report.

Crime and Disorder Act 1998

Section 17(1) of the Crime and Disorder Act 1998 imposes a duty on the Local Authority to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area. It is considered that there would be no significant or unacceptable increase in crime and disorder as a result of the Preferred Strategy. One of the objectives of sustainable development guided by the ISA process will be to ensure that places are secure and safe.

Consultation

The Preferred Strategy, including supporting documentation, will be consulted on in late 2023, subject to Cabinet endorsement and Council Approval. The consultation process will take a minimum of 6 weeks and responses will be fed back to Cabinet in September 2024 where endorsement of the Council's response and approval of a Deposit Plan for publication will be sought.

Background Papers

As outlined in the Report (see Table 4).

Dated: September 2023

**Appendix A – Growth and Spatial Options Consultation Representations and Response
(including an engagement report from Planning Aid Wales)**

Appendix B – Preferred Strategy (including an Easy Read version)

Appendix C – Consultation Plan