

## Local Development Framework

### Growth and Spatial Options Consultation

The below comments are published in accordance with Newport City Council's [Planning Policy Privacy Notice](#).

Please note that 68 individual responses were received in total (reps 012 and 040 were submitted in duplicate).

#### GSO 001 - Gwent Ornithological Society - 00389

Question / Response	Officer Response
<b>GROWTH OPTIONS:</b> <b>Growth Scenarios -</b> <b>1. Are there any scenarios that have been discounted which should be considered further, and why?</b> <b>2. Which of the options do you feel is the most appropriate, and why?</b> <b>Assessment of Growth Options Against RLDP Objectives -</b> <b>3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</b>	
1. No 2. 5. PG-Long Term or 6. Employment-led OE+D&I Uplift I favour these two options as they are least damaging for biodiversity and climate change. Green growth should be Newport's main focus and this should be in harmony with tackling the biodiversity and Climate Change crises. 3. No	Noted Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers. Noted
<b>Employment Land Review</b> <b>Recommendation One -</b> <b>4. Is this requirement appropriate for Newport?</b> <b>5. Should it be different and if so, why? Recommendation Two -</b> <b>6. Should some sites be removed from the employment supply? Why?</b> <b>7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.</b>	
4,5,6,7 No Opinion	Noted
<b>SPATIAL OPTIONS:</b> <b>8. Which of these options do you feel is the most appropriate, and why?</b> <b>9. Are there any other spatial distributions that should be considered, and if so, why?</b> <b>10. Are there any other matters that should be given consideration when assessing these?</b>	
8. PDL led or hybrid	Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred

<p>I favour these two options as they are least damaging for biodiversity and climate change. Green growth should be Newport's main focus and this should be in harmony with tackling the biodiversity and Climate Change crises.</p> <p>9 No</p> <p>11. No opinion</p>	<p>Strategy Consultation Paper and associated Background Papers.</p> <p>Noted</p> <p>Noted</p>
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**GSO 002 - Fire And Rescue Service - 00137**

Question / Response	Officer Response
<p>Changes to our climate and weather patterns will have a significant impact on the well-being of both current and future generations. In line with the Well-being of Future Generations (Wales) Act 2015 and the Future Wales - the national plan 2040 framework document, the following areas should be considered early in any planning process:</p> <p>The climate emergency is likely to increase the risk of flooding as a result of sea-level rises, more frequent severe weather systems and more intense rainfall. Planning authorities should adopt a precautionary approach of positive avoidance of building developments in areas of flooding from the sea or from rivers. Surface water flooding will affect the choice of location and the layout and design of schemes and these factors should be considered at an early stage in formulating any development proposals.</p> <p>Wildfires are a significant potential threat particularly in populated areas adjoining green spaces such as mountains or forestry. Therefore, it is critical that new developments are designed with this in mind. Where a new development is proposed in an area which is at risk of a wildfire, consideration should be given on how to mitigate the spread of wildfires. For example, sustainable land management could assist with prevention measures.</p>	<p>Section 5 of the G&amp;SO indicates spatial distribution options and assessed these at a high level in relation to their contribution to the emerging objectives of the plan, including:</p> <p><i>“Climate Change - To ensure that development and land uses in Newport are resilient to the effects of climate change, and actively tackle the causes and impacts of climate change through minimisation, adaptation and mitigation.”</i></p> <p>The issues of climate change, flooding and sustainable land management will be considered in further detail as the plan progresses.</p>

**GSO 003 - Dafydd Williams – 00844**

Question / Response	Officer Response
<p>After attending the last meeting at which there were no representatives of my local planning department nor any local councillors present to answer any questions that the public had I do not wish to attend any more of these meetings as I do not want to give this tick box exercise any air of legitimacy that it so obviously doesn't deserve.</p>	<p>Noted.</p>

**GSO 004 - Michael Sugrue - 00464**

Question / Response	Officer Response
<p>I would like the city council adopt a policy whereby all new housing developments must include a circular footpath and cycle path around the periphery of the estate.</p> <p>For existing estates, with no circular route, I would like to see better signage to guide casual walkers/cyclists to find their way through housing estates as a means of encouraging more local people to take exercise.</p> <p>Last summer my wife and I tried to walk from Hindering to Rogerstone Welfare and then through Jubilee Park housing estate and returning via Bassaleg. Parts of Jubilee park were enjoyable with a wide path suitable to walkers and cyclists but on other parts we were obliged to walk along estate roads only to find that they were fenced off from the path and we were forced to retrace and look for an alternative route. This was time consuming and frustrating.</p> <p>I appreciate that the cost of signage might be an issue in the current economic climate but having such routes available via the neport.gov.uk website would be a suitable solution as it would allow walks to be planned in advance.</p> <p>I am aware that you have published some leaflets that include walks for Wetlands etc but I would like to see something similar which might be called Urban Walks or Semi-Rural walks.</p>	<p>Section 5 of the G&amp;SO indicates spatial distribution options and assessed these at a high level in relation to their contribution to the emerging objectives of the plan, including:</p> <p><b>“Transport and Movement</b> - Reduce the need to travel and increase the use and provision of sustainable travel options.”</p> <p>Consideration will be given to these points once we progress to the policy drafting stage. It should be noted that the role of the plan is not to designate existing footpaths, but to be the framework to support such development proposals in appropriate locations.</p>

**GSO 005 - Guy Lewis - 00845**

Question / Response	Officer Response
<p>I live in Langstone and feel that it lacks community feel. It needs a centre. I mini market where fresh vegetables can be bought. I doctor's surgery, barbers etc. it has grown quite a bit over the 48 years I have lived here.</p> <p>The Gorelands and Catsash road area could be the perfect area and might have room for a new school which at the moment is far too small to accommodate children in the village. The old school could be a great area to develop for houses and a new school either on the Gorelands land or land on the Magor road near the Crematory.</p> <p>But Langstone lacks amenities. It has lots of hotels, but nothing for children and new families. Hillcroft garage is currently the only place to get a bottle of expensive milk. More amenities are required.</p>	<p>Consideration will be given to these points once we progress to the policy drafting stage. It should be noted that the role of the plan is not to deliver such facilities, but to be the framework to support such development proposals in appropriate locations.</p>

Question / Response	Officer Response
<p>I recently attended the open meeting regarding the next phase of domestic property building at Rhiwderin that covered the Bassaleg and Rogerstone area (hereafter referred to as R.B &amp;R). I would like to limit comments to the Rogerstone area but there will be some crossover with the other areas. I would like my comments to be included on any further planning applications that the council considers under the LDP Consultation</p> <p>Over many years the Rogerstone area has become saturated with new housing developments. It has become a 'village' in name only but now resembles a large suburb of the city.</p> <p>In my memory, below is a list of developments that have taken place, there could of course be others that I have forgotten</p> <ul style="list-style-type: none"> <li>• 'Court Gardens' - local to the vicarage roundabout</li> <li>• R/H side of Pontymason Lane - heading towards Risca leisure center 'Great Oaks' entrance opposite Bethesda church</li> <li>• 'Bethesda Place' opposite the Tredegar Arms public house</li> <li>• Mountplaesant / old Asda estate</li> <li>• Jubilee Park old Alcan site</li> <li>• Afon Village old Power Station site</li> <li>• Badgers Walk old Alcan playing fields</li> </ul> <p>Please excuse my memory if some of the estate names are incorrect but the location should assist you with the correct names to identify them.</p> <p>As with each property on average it contains 4 people, 2 adults and 2 children if statistics are to be believed.</p> <p>So any new property built will have a knock on effect to the local Health, Education and other Council run services. The pressure on local Ambulance services has had a dramatic effect with X waiting 8hrs while on the floor with a broken ankle after a fall and a motorcyclist waiting 3 hrs after a RTA.</p> <p>The addition of extra housing will only increase pressure on an already overstretched resources. Each property will also increase the amount of traffic that local roads will have to absorb (normally 2 vehicles per household). At present the local roads are frequently gridlocked with Forge Lane and the B4591 Cefn Road particularly effected as they a routs to the M4 motorway. Along with the congestion</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background paper.</p>

<p>comes extra pollution from vehicles that are stuck in 'traffic jams'. This situation has not been helped by the Welsh Assembly cancelling all new road building projects.</p> <p>Also as Newport is a Gateway to the M4, the local road network of R.B&amp;R has to cope with extra traffic from the other local areas of Caerphilly and Torfaen.</p> <p>So in summing up I do not think the area of R.B&amp;R should be considered viable for any further domestic property building in the next round of land procurement due to the detrimental effect on local services and roads.</p>	
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**GSO 007 - Dwr Cymru Welsh Water - 00013**

Question / Response	Officer Response
<p><b>GROWTH OPTIONS:</b> <b>Growth Scenarios -</b></p> <ol style="list-style-type: none"> <li><b>1. Are there any scenarios that have been discounted which should be considered further, and why?</b></li> <li><b>2. Which of the options do you feel is the most appropriate, and why?</b></li> </ol> <p><b>Assessment of Growth Options Against RLDP Objectives -</b></p> <ol style="list-style-type: none"> <li><b>3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</b></li> </ol>	
<p>Welsh Water has no real preference regarding the options being considered for the number of new homes to be provided through the Newport Replacement LDP. As a provider of water and sewerage infrastructure in the County we are primarily governed by the Water Industry Act 1991 (as amended) whereby we have a duty to extend and improve our assets to accommodate growth. We aim to ensure that sufficient infrastructure exists for domestic development, and we seek to address deficiencies through capital investment in our 5-year Asset Management Plans (AMP). We must put forward a business plan for investment for each AMP cycle, and as part of this work we require some certainty in terms of growth areas and site development proposals. An adopted Local Development Plan with allocated growth helps strengthen the case Welsh Water can put forward to our regulator Ofwat in relation to projects requiring AMP funding.</p>	<p>Noted</p>
<p><b>SPATIAL OPTIONS:</b></p> <ol style="list-style-type: none"> <li><b>8. Which of these options do you feel is the most appropriate, and why?</b></li> <li><b>9. Are there any other spatial distributions that should be considered, and if so, why?</b></li> <li><b>10. Are there any other matters that should be given consideration when assessing these?</b></li> </ol>	

The impact on our infrastructure will be dependent on the amount of growth and its spatial distribution. In terms of the spatial growth options under consideration we consider that development should be located so that it can be well serviced by existing or planned infrastructure where possible, in accordance with the requirements of Planning Policy Wales.

**Wastewater Treatment Works (WwTW):**

Most of the County is served by either Cardiff Bay or Nash WwTW, however some of the smaller villages are served by other WwTWs. The impact of development on our WwTWs will be dependent on the amount of growth within their catchment areas. Once further information is available regarding the breakdown of growth between settlements, we can assess the potential impact upon our assets. Where the total growth identified by proposed allocations exceeds the theoretical design capacity of the WwTWs then improvements to provide further capacity will be required during the LDP period. The 'Village Focus' option lists 9 defined villages, these are served by WwTWs of varying size, and we have listed below which WwTW catchment each of these villages falls within:

Villages listed in 'village focus'	WwTW catchment
Castleton & Marshfield	Cardiff Bay
St Brides	St Brides Wentlooge
Bishton	Nash
Llanwern	Nash
Underwood	Nash
Llanvaches	Nash
Parc Seymour	Nash
Christchurch	Christchurch
Caerleon	Nash

**Water supply and sewerage infrastructure**

Once sites are identified we will be able to determine whether there is sufficient capacity within the water and sewerage networks to accommodate the growth proposed. Hydraulic modelling assessments may be required to determine an adequate point of connection to the water network and/or public sewer, particularly for strategic development sites, and developers would be expected to fund investigations during pre-planning stages. The findings of a hydraulic modelling assessment would identify the extent of any necessary reinforcement to the network which can be acquired through the requisition provisions of the Water Industry Act 1991 (as amended).

Noted, we will continue to liaise with relevant stakeholders on these matters as the plan progresses.

**OTHER COMMENTS:**

We are currently delivering the AMP7 programme which covers our capital investment for the period 2020-25, this will be followed by AMP8 for 2025-2030, and AMP9 for 2030-35. The Newport Replacement LDP has a timeframe that runs until 2036 therefore any infrastructure investment required

Noted, we will continue to liaise with relevant stakeholders on these matters as the plan progresses.

<p>can be considered for delivery in future AMPs. Where specific infrastructure improvements are required to allow a development site to proceed, but where there are no current plans to invest through the AMP, there are provisions available for developers to make financial contributions, via planning obligations under the provisions of S106 Town &amp; Country Planning Act 1990, to secure the necessary improvements. At this early stage of the LDP process, without knowing the level of growth in each settlement and the specific location of proposed development sites, we will not be able to accurately assess the capability of WwTWs and the existing sewerage and water network to accommodate proposed growth. Once further information is available, we would be pleased to work with the LPA to undertake the necessary assessments.</p>	
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**GSO 008 - Matthew Bevington - 00775**

Question / Response	Officer Response
<p><b>GROWTH OPTIONS:</b>  <b>Growth Scenarios -</b>  <b>1. Are there any scenarios that have been discounted which should be considered further, and why?</b>  <b>2. Which of the options do you feel is the most appropriate, and why?</b>  <b>Assessment of Growth Options Against RLDP Objectives -</b>  <b>3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</b></p>	
<p>1. The options presented do not include a scenario that represents growth during recessions. Economic forecasts indicate a likely recession over the next several years. Scenarios that represent similar growth in the years around the 2008 economic conditions may be more relevant.  2. I believe growth will be lower due to forecasted economic conditions. Therefore Options 5 and 6 may be the most likely outcome.  3. N/A</p>	<p>The Demographic Evidence considered unemployment rates and recession using Data from ONS since 2004.  Noted  Noted</p>
<p><b>EMPLOYMENT LAND OPTIONS:</b>  <b>Recommendation One -</b>  <b>4. Is this requirement appropriate for Newport?</b>  <b>5. Should it be different and if so, why?</b>  <b>Recommendation Two -</b>  <b>6. Should some sites be removed from the employment supply? Why?</b>  <b>7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.</b></p>	
<p>4. It appears the number of 77ha has not considered already existing vacant employment areas. It is nonsensical that this figure be derived independent of a review of the occupation of available employment areas.</p>	<p>The Employment Land Review (NB not executive summary) discusses this in more detail and includes “along with a review of the supply of vacant premises and enquiries data” and a Vacancy Schedule.</p>

<p>5. As above, a review of existing vacant employment land should be undertaken to derive a reliable figure.</p> <p>6. N/A</p> <p>7. N/A</p>	
<p><b>Spatial Options</b></p> <p><b>8. Which of these options do you feel is the most appropriate, and why?</b></p> <p><b>9. Are there any other spatial distributions that should be considered, and if so, why?</b></p> <p><b>10. Are there any other matters that should be given consideration when assessing these</b></p>	
<p>8. I believe the PDL Led option is the most appropriate. It is important to use brownfield sites as these are the least constrained sites. Newport has undergone rapid growth and the surrounding green areas and villages are under pressure from this growth.</p> <p>9. It is important that the coalescence of Newport City and the surrounding "Villages" is avoided. Also, the coalescence of the "Villages" with neighbouring Boroughs is avoided. Existing Green Wedges should be maintained and preferably upgraded to Green Belt status. There is a real risk in places such as my "Village" Rogerstone that any expansion towards Risca will cause one continuous conurbation. Biodiversity should be maintained and all non-statutory and statutory habitat sites protected.</p> <p>10. As above, It is important that the coalescence of Newport City and the surrounding "Villages" is avoided. Also, the coalescence of the "Villages" with neighbouring Boroughs is avoided. Existing Green Wedges should be maintained and preferably upgraded to Green Belt status. There is a real risk in places such as my "Village" Rogerstone that any expansion towards Risca will cause one continuous conurbation. Biodiversity should be maintained and all non-statutory and statutory habitat sites protected.</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p> <p>The deposit plan will include reviewed urban and village boundaries and Green Wedge designations.</p> <p>Noted</p>
<p><b>EVIDENCE BASE:</b></p> <p><b>11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</b></p> <p><b>12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</b></p>	
<p>11. National and global economic forecasts should be considered when determining likely growth.</p> <p>12. The RLDP options taken forward should prioritise the preservation of Green Wedges. The RLDP should ensure that the coalescence of "village" areas does not continue. For example there is a serious risk that areas such as Rogerstone and Pontymister/Risca areas are becoming one continuous settlement. "Village" areas are under tremendous pressures from traffic, coupled with lack of amenities and suitable infrastructure. Further residential developments in these areas would exacerbate the problem. The RLDP should focus development on available brownfield sites and look to optimise existing vacant residential and industrial areas.</p>	<p>The Demographic Evidence, Employment Land Review (NB not executive summary) detail what key economic factors have been considered.</p> <p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p> <p>The Deposit Plan will include reviewed urban and village boundaries and Green Wedge designations.</p>



**GSO 009 - Marshfield Community Council - 00022**

Question / Response	Officer Response
<p>The revised LDP shows no evidence of any significant redevelopment or specific changes to occur in Marshfield and Castleton. However, we would like to firstly draw your attention to the following unmet key points that were in the original and revised LDP. Since there are no specifics under the various areas, we would request that you would comment specifically on how you wish to achieve these.</p>	<p>The Deposit Plan will include reviewed urban and village boundaries and Green Wedge designations.</p>
<p><u>Transport</u>            The regular bus service, rather than being improved, was removed and replaced with a DRT Service. This has had the negative effect on the LDP as follows: -</p> <ul style="list-style-type: none"> <li>* Skills access</li> <li>* Quality of life</li> <li>* Less sustainable forms of travel being used</li> <li>* No reduction in noise levels</li> <li>* No improvement in air quality</li> </ul>	<p>The role of the Local Development Plan is to facilitate new and improved services, but it does not directly allocate these or determine the location.</p> <p>As part of this process the LDP team will continue to work with partners, including Welsh Government and Transport for Wales, during the preparation of the replacement LDP to ensure policy reflect the opportunities identified by the appropriate transport strategies and that our development strategy seeks to support the delivery of strategic and local transport improvements.</p> <p>Comments have been passed to City Services</p>
<p><u>Flood Risk</u>            We would like to know what further preventative measures are going to be put in place. To date, these are insufficient as seen with flooding in December 2020, January 2021 and in earlier years. Specifically, there is room for improvement in: -</p> <p>a) The regular maintenance and management of the drainage systems ditches and Reen system in the Marshfield area and generally in the whole of the Wentlooge (Gwent) Levels, currently the responsibility of the failing NRW to prevent flooding.</p> <p>b) Prevention of surface water on the road and flooding of land immediately next to the roads e.g., Church Lane, St. Mellons Road, Marshfield Road near the allotment, Acorn Place, Groes Corner, Hawse Lane, Ty Mawr Road.</p> <p>Many of these roads are the main road network in and out of Marshfield. Therefore, when flooded Marshfield is left closed off from other areas preventing transport in and out until the flood level depletes.</p>	<p>The role of the Local Development Plan is to facilitate new and improved services, but it does not directly allocate these or determine the location.</p> <p>As part of this process the LDP team will continue to work with partners, including Welsh Government and NRW, during the preparation of the replacement LDP to ensure policy reflect the opportunities identified by the appropriate flooding strategies and that our development strategy seeks to support the delivery of strategic and local improvements.</p> <p>Comments have been passed to City Services</p>

<p>c) In the case of an emergency, communication to residents, pedestrians and motorists warning of flood waters. There are no emergency supplies of sand bags for residents either, or communication of where they can be obtained. In December residents were diverted from one agency to another in order to get help. When flooded, communication lines are the first to go down, so this is of paramount importance.</p>	
<p><u>Road Maintenance</u> The quantity of potholes in Church Lane leaves more pot holes than actual road surface. This is on a road which is the main access to the parish church for pedestrians, cyclists and motorists. The church is obviously used for various events. This is particularly bad when the potholes are also filled with flood water and especially dangerous at night time. This has been reported for years and the potholes poorly filled instead of resurfacing. We would like to see a programme of maintenance to bring back the roads to a good standard to achieve their intended purpose.</p>	<p>The role of the Local Development Plan is to facilitate new and improved services, but it does not directly allocate these or determine the location.</p> <p>As part of this process the LDP team will continue to work with partners, including Welsh Government and Transport for Wales, during the preparation of the replacement LDP to ensure policy reflect the opportunities identified by the appropriate transport strategies and that our development strategy seeks to support the delivery of strategic and local transport improvements.</p> <p>Comments have been passed to City Services</p>
<p><u>Street Scene</u> No regular maintenance plan to improve street signage when they become unreadable. In some cases this causes a major issue for motorists who have to slow down to read the sign, thus causing an obstruction.</p>	<p>The role of the Local Development Plan is to facilitate new and improved services, but it does not directly allocate these or determine the location.</p> <p>As part of this process the LDP team will continue to work with partners, including Welsh Government and Transport for Wales, during the preparation of the replacement LDP to ensure policy reflect the opportunities identified by the appropriate transport strategies and that our development strategy seeks to support the delivery of strategic and local transport improvements.</p> <p>Comments have been passed to City Services</p>
<p><u>Facilities</u> When completing the online consultation form it requests a “yes” or “no” for most facilities. There is no room for “not applicable”. The extent, of the lack of facilities that Marshfield and Castleton experience is of concern to our residents. Specific forward planning is required by NCC to enable space to be made for some of these services to be restored, particularly as Marshfield has expanded over the years and is</p>	<p>The appraisal village boundary designations (including an assessment of available services) is presented in the Settlement Assessment Background Paper.</p>

<p>seen as a Village but has the population of a town. We have one shop only in Marshfield which is a small shop selling basics/post office/chemist all in one. In Castleton there is only a service station which includes a shop selling basics.</p> <p>Missing facilities include: -</p> <ul style="list-style-type: none"> <li>*Doctors Surgery</li> <li>*Dentist Surgery</li> <li>*Other Retail Shops</li> <li>*Coffee Shops</li> <li>*Library</li> <li>*Parking. There is limited parking for the local shop and for Marshfield Primary School, both have double yellow lines close by them preventing parking for safety reasons.</li> <li>- The lack of alternative parking however causes many to park illegally causing a hazard to pedestrians (particularly young children) and passing motorists and this is not dealt with adequately.</li> <li>*Public Toilets – The lack of facilities on the A48 results in the Lych-gate to the Cemetery being used as a urinal.</li> </ul> <p>All of these essential facilities have to be sourced in other areas of Newport and Cardiff which require good access to public transport which Marshfield doesn't have.</p>	
<p><u>Accessibility</u></p> <p>No road crossings on the A48 in Castleton suitable for the elderly/ less able/some pram and pushchair users.</p> <p>The existing pedestrian bridge is good but not suitable for all.</p> <p>Footpaths have no ongoing programme of maintenance and we have had repeatedly request these are maintained for normal use.</p> <p>No traffic calming measures have been put in place on the A48, despite numerous requests to all authorities where pedestrians, especially the elderly, frail and disabled need to cross the road to access bus services into Newport and Cardiff. Pupils need to cross the road to catch a school bus, and Students need to use the bus service to college.</p> <p>The speed limit is 50mph through numerous junctions. However, traffic travels at speeds well in excess of this, through an area with two main junctions and many other roads adjoining it either side, which are considered in traffic management terms as potential hazards. The following are a summary of motorist journeys. In this short length of carriageway there are in excess of 30 possible journeys that can occur on the A48 at Castleton, which at peak times in particular make these junctions dangerous as follows: -</p> <ul style="list-style-type: none"> <li>• Traffic to and from the Nursing Home from Cardiff and Newport and Marshfield Road and Coal Pit Lane</li> <li>• Traffic to and from the Premier Inn and Coach and Horses from Cardiff and Newport, Marshfield Road and Coal Pit Lane</li> </ul>	<p>The role of the Local Development Plan is to facilitate new and improved services, but it does not directly allocate these or determine the location.</p> <p>As part of this process the LDP team will continue to work with partners, including Welsh Government and Transport for Wales, during the preparation of the replacement LDP to ensure policy reflect the opportunities identified by the appropriate transport strategies and that our development strategy seeks to support the delivery of strategic and local transport improvements.</p> <p>Comments have been passed to City Services</p>

<ul style="list-style-type: none"> <li>• Traffic to and from Coal Pit Lane from Marshfield Road, the Service Station, Channel View, Craig y Haul, Newport and Cardiff</li> <li>• Traffic to and from Marshfield Road from Coal Pit Lane, the Service Station, Channel View, Craig y Haul, Cardiff and Newport</li> <li>• Traffic to and from Channel View to Newport, Marshfield Road, the Service Station, Craig y Haul, Cardiff</li> <li>• Traffic to and from Craig- y – Haul from Cardiff, Channel View, the Service Station, Coal Pit Lane, Marshfield Road, Newport</li> <li>• Traffic to and from the Service Station from Marshfield Road, Coal Pit Lane, Craig y Haul, Cardiff and Newport</li> <li>• Traffic from Cardiff returning back to Cardiff</li> <li>• Other residential driveways adjoining the A48.</li> </ul> <p>This most certainly would benefit from traffic management which is notably provided in less populated areas of Newport that have less junctions and less potential for accidents. The wellbeing of future generations should apply here. Waiting for more accidents and fatalities on this stretch of road before action is taken is abhorrent to the majority of road users and pedestrians. The cost of one fatality in a road traffic accident is in the region of £1.69 million!</p>	
<p><u>Illegal Parking Safety issues</u></p> <p>Parking on double yellow lines continues outside Marshfield Primary School, causing a danger to pedestrians (particularly children) and passing motorists and needs to be dealt with more quickly and severely.</p> <p>Secondly, we would like to propose the following are added to your proposals as part of your planning framework for development and use of land in Newport: -</p> <ol style="list-style-type: none"> <li>1) Provide enhanced legal protection/designation like an ANOB for The Wentlooge (Gwent) Levels SSSI and special landscape areas and heritage landscapes ensuring that they are safe and protected from continued pressure for development and preserved for future generations.</li> <li>2) Prohibit the granting of planning consent for new builds in areas where the community has been categorised as "unsustainable". This would affect local infrastructure e.g., roads and drainage and possibly amenities for which very little space is available.</li> <li>3) The green wedge west of Newport to the Cardiff border is in need of protection from new housing development especially connected with the proposed new train station at St. Mellons. (Bellway Homes has either purchased or paid a retainer on land west of Marshfield on St Mellons Road).</li> <li>4) Any new developments should be on Brownfield Sites but only with due consideration for the unique environment around them including dormice, otters, shrill carder bee and voles. Furthermore, archaeological sensitive areas should not be affected by new development.</li> </ol>	<p>The law in relation to AONBs is to be found in the <a href="#">Countryside and Rights of Way Act 2000</a>, which provides for the designation of areas which (not in a national park) are of outstanding natural beauty.</p> <p>The Deposit Plan will include reviewed urban and village boundaries and Green Wedge designations.</p>

5) Arterial routes/lanes into and out of Marshfield should be protected from illegal development 'creep' of industrial sites.	
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**GSO 010 - Councillor Pat Drewett - 00739**

Question / Response	Officer Response
<p><b>Growth Options</b></p> <p><b>1. Are there any scenarios that have been discounted which should be considered further, and why?</b></p> <p><b>2. Which of the options do you feel is the most appropriate, and why?</b></p> <p><b>Assessment of Growth Options Against RLDP Objectives -</b></p> <p><b>3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</b></p>	
<p>1) Because the war in Ukraine has lessened the resolve of many countries to reduce carbon emissions and coal and oil production is now increasing, even greater care should be taken to mitigate flood-risk across Newport by ensuring that development and land uses across Newport are resilient to the effects of climate change not only through minimisation and mitigation but also by means of physical infrastructure. The River Usk has the second highest rise and fall of the tide in the world with a tidal range of approximately 10 m at each tide. The tidal flow of the River Usk (commonly measured as the volume of water flowing at a given location every second) is 514 m<sup>3</sup>/s which is 156% greater than the River Severn at 329 m<sup>3</sup>/s. Climate change is likely to increase by as much as 4m the high water mark of each flood tide which represents a clear and evident threat not only to low lying areas but to the whole economy of the city. Newport does not want to be tagged as "Flood City".</p>	<p>The G&amp;SO have been assessed at a high level in relation to their contribution to the emerging objectives of the plan, including:</p> <p><i>"Climate Change - To ensure that development and land uses in Newport are resilient to the effects of climate change, and actively tackle the causes and impacts of climate change through minimisation, adaptation and mitigation."</i></p> <p>The issues of climate change and flooding will be considered in further detail as the plan progresses.</p>
<p>TAN 15 is currently suspended to allow for re-assessment of the impact of climate change on flood-risk which is likely to identify and highlight an intensified risk of flooding in Newport. A revised TAN15 is due to be implemented in June 2023. To safeguard the city's residents, a flood defence barrier should be built across the river linking riverside bunds and with locks to allow the passage of small boats to form a central feature in planning for the future, since all citizens will be impacted in some way by flooding, whether or not they live in low-lying parts of the city. Safeguarding Newport's residents from flooding through a flood defence barrier across the river could well maximise other opportunities for the city's growth options by allowing an additional Riverside Growth Option.</p>	<p>Noted.</p> <p>Please note the coming into force of the new TAN 15 has been suspended due to a further consultation on the TAN. Planning Policy Wales, TAN 15: development and flood risk (First published: 30 July 2004, Last updated:24 November 2021) and the Development Advice Map (DAM), remain in place as the existing policy framework. The Flood Maps for Planning are a material consideration and are publicly available.</p>
<p>To ensure that the economy of Newport is resilient to the effects of climate change, one scenario which is missing from the options under consideration is the potential offered by the city's river. The River Usk offers an amazing additional scenario for development growth by providing space for several floating</p>	<p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of</p>

<p>home marinas along its banks from the Transporter Bridge to Caerleon. These floating marinas would be spaced out so that they did not detract from the riverscape - some catering for social housing and some for the luxury market. An active travel route already exists for much of these stretches of river adding value to the marina developments which would offer eco-friendly growth potential, meeting the needs of present and future communities, ensuring resource efficiency and improved health outcomes.</p> <p>The construction of a physical flood defence barrier across the River Usk near the Transporter Bridge to protect the city from the future effects of climate change would create a non-tidal water basin upstream of the barrier, making riverside growth a credible option for development. However such a flood defence barrier cannot be built without associated infrastructure to prevent effluent discharges into the river and to stabilise the water table. Floating marina developments along the river would assist Newport's economic growth by offering a new and diverse range of marine employment potential creating further opportunities to establish and enhance a circular local economy supporting a strong and resilient city. This type of development would provide high-quality homes in a national priority area for growth that meet the needs of the residents of the city as long as that these homes are supported by the necessary social, environmental, cultural and physical infrastructures that provide a safe, healthy environment to maintain and enhance community cohesion.</p>	<p>assessment will be published as part of the Preferred Strategy consultation.</p> <p>The role of the Local Development Plan is to facilitate new and improved services, but it does not directly allocate these or determine the location.</p> <p>As part of this process the LDP team will continue to work with partners, including Welsh Government and NRW, during the preparation of the replacement LDP to ensure policy reflects the opportunities identified by the appropriate flooding strategies and that our development strategy seeks to support the delivery of strategic and local improvements.</p>
<p>2) The Hybrid Option, including the Riverside Growth Option, a mix of previously-developed land, sites on the edge of the urban boundary and sites surrounding existing villages is my preferred strategy because it draws on the spatial benefits of all the other options, is flexible, adaptable and could be varied in future as the need arises. A well-balanced Hybrid Option offers the best range of solutions for Newport where inclusive, connected, adaptable, accessible and cohesive communities will thrive and where Newport's Welshness is celebrated.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p>3) In Table 3 on page 15 of the report, there is a contradiction in the outcome assessment of growth options shown, in that Health and Well-being is shown as green across all options whereas Climate Change is marked red/orange. There is a discrepancy here as pointed out in paragraph no.1 above.</p>	<p>This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.</p>
<p><b>Employment Land Review</b></p> <p><b>Recommendation One -</b></p> <p><b>4. Is this requirement appropriate for Newport?</b></p> <p><b>5. Should it be different and if so, why?</b></p> <p><b>Recommendation Two -</b></p> <p><b>6. Should some sites be removed from the employment supply? Why?</b></p> <p><b>7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.</b></p>	
<p>4) I have no reason to challenge Recommendation One as it appears that the employment land supply remains buoyant in the emerging plan period.</p> <p>5) See Section no.4 above.</p>	<p>Noted</p>

6) I have no reason to challenge Recommendation Two.	
7) Please see my comments above in Section no.1.	
<b>SPATIAL OPTIONS:</b>	
<b>8. Which of these options do you feel is the most appropriate, and why?</b>	
<b>9. Are there any other spatial distributions that should be considered, and if so, why?</b>	
<b>10. Are there any other matters that should be given consideration when assessing these?</b>	
8) Given its coastal location, climate change is clearly going to have a major impact on development in the City of Newport.	Noted
9) None	
10) None	
<b>EVIDENCE BASE:</b>	
<b>11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</b>	
<b>12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</b>	
11) Yes. Existing NRA flood maps for the area. A revised TAN15 is due to be implemented in June 2023. This will be supported by the new Flood Map for Planning, which will include climate change information to show how this will affect flood risk extents over the next century. It will show the potential extent of flooding assuming no defences are in place.	The RLDP will consider any new National Policy, Legislation, Guidance and TANs etc as they are published.
12) Please see Section #1 above.	

**GSO 011 - Viv Batchelor - 00846**

<b>Question / Response</b>	<b>Officer Response</b>
<p>The comments below are my feedback on the Consultation process for the RLDP, comments I raised with Mark Jones at the time we attended a face to face meeting. These represent my feelings as a resident, not as a Community Councillor, nor are they on behalf of Penhow CC.</p> <p>I'd like to raise some points that I made during the presentation by firstly asking a question.</p> <p><u>City or Village?</u></p> <p>I find it difficult to determine, from Newports written and online outputs such as publications, documents, newsletters and leaflets, just where Penhow sits, or is regarded, in the framework of 'Newport'. 'Newport' doesn't readily acknowledge its County role in its texts. The maps show Parc Seymour as an urban Inset 7. However we're in the Village option map. Penhow is not just Parc Seymour, and Penhow isn't mentioned. I see 'Newport' as Newport City and County Council.</p>	<p>The Deposit Plan will include a review of the urban and village boundaries. The Settlement Assessment Background Paper provides a village appraisal.</p>
<p><u>Communication.</u></p>	<p>Public involvement and transparency/ openness generally are key driving principles which guide the preparation of the</p>

<p>As a comment on the Consultation approach, I find it clear and easily understood, but narrow in its reach, and not transparent when it needs to be. In private industry, such a consultation, where comment is requested before any practical discursive information is available, would have no chance of a successful outcome for anyone. The timing of the next opportunity to attend a consultation meeting must come after we have the candidate list, and before the Preferred strategy is defined.</p> <p>We have notice boards that inform residents of and can only show a certain amount of information. Residents awareness and information sources on the LDP or RLDP will be mainly through online routes of communication, with no supporting leafleting to direct residents when key topics arise and where to look. The Press, local and National, continues to follow an opinion based editorial , on shock, alarmist or celebrity based topics, so front pages no longer lead on governance of the area often enough. Just like the Newport Matters publication, Newsletters on the RLDP, are only available online. Articles in Newport Matters are mainly limited to Newport City, anyway, and information pertaining to the whole County is poor.</p> <p>In a village of many new and long term retired residents, many of those won't have maintained their online connections if they ever had one, so I'd say out of all of the homes in Penhow we may have only a few residents reading anything regularly that 'Newport' publishes. In summary, the reach of information is very poor indeed.</p> <p>Families are increasingly finding homes in the village of Penhow. Their next job, their services, their education, their aspirations, depend on local information.</p> <p>We have to stop thinking that children should be the route for communicating on adult sensitivities and sensibilities, using schools to get messages out. Schools are not the places to bring local, political or selective social messaging for discussion. Communication needs to be full, not partial and not depend on the eldest and youngest generations to find out and pass it on. It didn't look to me as if the Ringland Community attended in any numbers, and there were only 8 or 9 residents present from Langstone and Penhow.... And that's a key consultation affecting everyone , held in Ringland. That should ring alarm bells in any consultation process.</p>	<p>RLDP. The Revised Delivery Agreement (agreed with the Welsh Government) includes a Community Involvement Scheme outlining how we will proactively involve the community and other stakeholders in the preparation of the RLDP and this is being followed.</p> <p>Anyone requesting to be to be involved in the RDLP can specify that communication is via email or letter, and everything that has been produced and consulted on for the RLDP to date has been published on the Council's website. These documents can also be viewed in person by appointment either at the Civic Centre, or the Newport Central Library. Planning Aid Wales (PAW) has been engaged to undertake the public engagement activities for the RLDP For the Growth &amp; Spatial Options Consultation they held 10 Events / Meetings (4 Online &amp; 6 Face-to-Face)</p> <p>In addition to this, the Council shares any active consultations via the 'Have your Say' section of the Council's home page, as well as any public engagement events you can participate in under the 'News &amp; Events' section of the home page. These are also promoted via our various social media platforms and bi-monthly editions of the Newport Matters publication and the RLDP Newsletters.</p>
<p><u>Transport.</u></p> <p>We have an increasing problem with the A48. During the last bout of bad weather, our old, badly maintained drainage, couldn't cope in two places within a half mile, with flooding which contributed to several serious accidents over several days. Speed, car maintenance, and driver behaviour contributed to them, too.... although we can't say that without evidence, but we can all see it. We have narrow roads and problems with parking, we have 50mph speed signs 200 yards from a junction and outside a park, there are no traffic calming measures, no road markings. Narrow lanes used by residents are increasingly pot holed , unkempt, or blocked by delivery drivers. The traffic levels are changing, the driving behaviour is changing, the motorist is changing. 'Newport' put a drop kerb on a pavement in Parc Seymour, it took</p>	<p>Noted</p> <p>The role of the Local Development Plan is to facilitate new and improved services, but it does not directly allocate these or determine the location etc.</p> <p>As part of this process the LDP team will continue to work with partners, including Welsh Government, Transport for Wales, NRW, the Police and Health Service during the preparation of the replacement LDP to ensure policy reflect the opportunities identified by the appropriate strategies and</p>



several days. residents of Newport City Homes park in front of it most of the time. No one can see the point of the drop kerb. It wasn't what was needed, and nothing else changes.

The A48 has, in the main, a 40 or 50mph driving limit, rising to a 60mph limit in Monmouthshire's part. All residents know that means a lot of drivers will be moving at a speeds of up to 70mph and above, between the Coldra and Chepstow. Double white lines, and hatched and coloured road surfaces on the A48 do not stop overtaking on it by drivers in a hurry at high speed, any more than a badly placed drop kerb makes crossing the road safer. We need a review, to look again at speed limits, pavements, paths, lanes, lay bys , so that drivers and cyclists can pull out of side roads without harassment from drivers in a hurry, so that tractors can move safely, so that pedestrians can cross roads and negotiate lanes. This is before any growth or spatial options for the RLDP are considered.

We weren't considered for the fflecsi bus route, and even though it's now not available, how does that fit with an urban inset 7?

#### Signage.

When our village road signs fell into disrepair we had to replace them via the Community Council from the precept. That's not something Newport City residents would accept. We cannot keep using the precept as a parish source of funding, if Newport City and County Council takes an urban view of what's needed.

#### Emergency Support.

When we had travellers arrive, we had a very slow attendance time for representation from Newport City and County Council and again the huge effort and cost fell to the precept . The Police did nothing except make it impossible for residents to solve the problem on that day.

#### Criminality and Policing.

Speeding. Parking. Littering. Flytipping.

We have no attention to any of it without incessant Report it efforts, online, to Newport City and County Council, and we are always on the back of our hard working City Councillors. We have been promised Police attention to the many off road bikes tearing through the village and the A48 on their back wheels, in excess of speed limits, making abusive gestures , so they can drive in the forest, churning it up, intimidating walkers and ruining ancient barrows. We're reduced to reporting the broken stiles, asking for Forest gates and repairs for potholes, lay-bys and banks in the lanes, as repeated piecemeal exercises rather than as part of what should be a Newport County willingness to provide routine support. I started a litter picking group, but stopped because I was pick up empty cocaine bags in the lay bys on the A48. That's a policing and highways issue, if people are driving under the influence of drugs or alcohol.

#### Volunteers are self supporting.

There is no amenity in Penhow that isn't run by volunteers, including our shops, Church and Chapel halls, social groups and Community Council. There are no surgeries, doctors, dentists, libraries and banks, and

that our development strategy seeks to support the delivery of strategic and local improvements.

Comments have been passed to City Services and Environmental Health

<p>you'll rarely see anyone waiting in the bus stops on the A48. There is now no part time Post Office Service , and Newport needs to update its website for our postcode. Just take a look at the distances quoted for travel to services.</p> <p>So, I wonder now what Newport City and County Council will do for the future for even our current infrastructure, let alone a changed one, if the RLDP outcome gives the preferred strategy as the Village option and is either business or population led . Penhow has constraints of geography, topography, amenity, natural environment and history, too.</p> <p>In my short time as a Community Councillor, and relatively short time as a resident of a Penhow , I can't see Newport City and County Council assessing the viability of any new businesses and new home building effectively in Penhow, and it needs to take an immediate and serious look at what it's doing now.</p> <p>New residents in Caldicot won't shop in Caldicot, it's failing rapidly. They won't like Newport City without good quality shopping, nor Chepstow for lack of parking and traffic levels, but they will maybe go to Spytty and that'll be via the A48, from which they'll soon find Newports back roads into Cardiff.</p> <p>Accidents, winter weather conditions and summer traffic all impact on the A48, drivers want a quick route to work and a quicker one home.</p> <p>I think change is inevitable, to support growing and changing populations, for a healthy Welsh economy. The pandemic has changed people's perceptions of themselves and expectations of others, there's no reset button. Businesses from outside Wales and from inside take up Welsh government grants but provide little long term growth. They renege on employment promises, take the funds, fail, start again.....and again....giving the Welsh economy few opportunities even to aspire to , let alone, see the community benefits of growth.</p> <p>Time for a wake up call, a bit of care, and a change of approach, before determining a growth strategy, but at least we are , as you said, in the process early, so can hopefully use a voice that has a chance to be heard, and hope for some effective listening to be done.</p>	
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**GSO 013 - Jonathan Hughes - 00783**

Question / Response	Officer Response
<p><b>Growth Options</b></p> <ol style="list-style-type: none"> <li><b>1. Are there any scenarios that have been discounted which should be considered further, and why?</b></li> <li><b>2. Which of the options do you feel is the most appropriate, and why? Assessment of Growth Options Against RLDP Objectives -</b></li> <li><b>3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</b></li> </ol>	
<p>By way of background, Cwmpas, previously known as the Wales Co-Operative Centre, is a development agency focused on building a fairer, greener economy and a more equal society, where people and planet come first. Established in 1982, Cwmpas have made it their mission to change the way our</p>	<p>Noted</p>

<p>economy and society works. Cwmpas is a not for profit organisation which supports Wales' economic growth, helps communities to become stronger and more inclusive and in turn supports people in Wales to improve their lives and livelihoods by delivering a range of projects which help social businesses to grow; help people to learn digital skills, help people set up their own co-operatives in care and housing and help people to invest in their community.</p> <p>It is considered to be fundamental that any assumptions, scenarios or options need to reflect the recognition of Newport as a centre for national growth, its place in the South East Wales regional hierarchy, the context of Severnside development on either side of border between Wales and England, and finally, the role and impact of major infra-structure projects either side of the border.</p> <p>It is viewed as a positive feature that Previously Developed Land (PDL) is a key component for new development opportunities but that this is and should be supplemented by new land allocations not previously developed. This is particularly important to ensure deliverability and viability of new development given issues around site size, configuration, access and former use legacy of PDL.</p> <p>It is agreed that those options and scenarios that do not support or align with the role of Newport as a centre for national growth are set aside at an early stage in the considerations as they would simply not conform to the wider strategic policy framework.</p>	
<p>In considering the most appropriate option, it is suggested that the Dwelling Led 10 Year option is preferable. This provides a longer term view of historic trends, smooths out peaks and troughs in the levels of development activity and provides for a sustainable, deliverable level of growth that recognises past trends and future capacity to accommodate growth whether that be environmental, social or economic sustainability.</p> <p>Furthermore, when looking at the RLDP Objectives, it is evident that many if not all are set in the context of the Well-Being of Future Generations Act but that as the plan evolves it will be important to move from the quantitative allocation of uses and area to a qualitative assessment which will allow mitigation of some of the issues around natural environment, biodiversity and climate change in terms of how that development is undertaken.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background paper.</p>
<p>By way of other matters that could be addressed, Cwmpas sees a clear synergy between the key issues, challenges, options and scenarios of the Newport Replacement Local Development Plan and community led housing programmes and projects. Community-led housing is housing development where the community plays an integral role in identifying local needs and bringing a proposal forward with a view to delivering social and economic benefits to a local area. Such projects must meet long term housing needs and will provide affordable housing for local people. This can include all types of affordable housing meeting defined within the Welsh planning policy context. Furthermore, there is a direct statement of support for community led housing projects within the Welsh Government 'Programme for Government 2021 - 2026'.</p>	<p>Noted.</p>
<p><b>Employment Land Options</b></p>	

<p><b>Recommendation One -</b></p> <p><b>4. Is this requirement appropriate for Newport?</b></p> <p><b>5. Should it be different and if so, why?</b></p> <p><b>Recommendation Two -</b></p> <p><b>6. Should some sites be removed from the employment supply? Why?</b></p> <p><b>7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.</b></p>	
<p>It is emphasised that employment land options must provide a framework for conformity with the acknowledged national growth role of Newport. Moreover, recognition must be made that employment land allocations are underpinned by suitable and appropriate infras-structure whether that be physical in terms of transport and movement or social in terms of housing, education or health facilities. By doing this, it is considered that the optimum and holistic benefits and outcomes will be achieved for Newport through using the RLDP to foster wider well-being and economic and social prosperity.</p> <p>Similarly, and for subsequent consideration as the RLDP evolves will be the need to ensure that not just quantitative allocations of employment land are made but that the nature and type of site is considered to provide a diverse range of opportunities to attract different employment types and being mindful of the physical environmental quality of those allocated sites.</p> <p>It is considered to be positive that scope for redesignation or repurposing employment sites for other land uses is developed within the RLDP. Pending the sustainability of the location and addressing viability issues around industrial legacy, it is suggested that housing could be a suitable alternative use where perhaps employment use is no longer viable. Moreover, whilst outside the remit of the RLDP, it is possible that such sites are in public sector ownership and as such the release for housing could support the delivery of RLDP housing targets and in particular affordable housing needs.</p>	<p>The Demographic Evidence, Employment Land Review (NB not executive summary) detail what key economic factors have been considered.</p> <p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>
<p><b>Spatial Options</b></p> <p><b>8. Which of these options do you feel is the most appropriate, and why?</b></p> <p><b>9. Are there any other spatial distributions that should be considered, and if so, why?</b></p> <p><b>10. Are there any other matters that should be given consideration when assessing these?</b></p>	
<p>When considering the spatial options, a preference is expressed for the 'Hybrid' option. This continues to use a component of PDL but as that alone will not meet the growth assumptions in the plan, it will need to be supplemented by urban expansion and village settlement growth.</p> <p>There are two key considerations that are suggested to be important in adopting such an option. Firstly, any new urban expansion or village settlement growth must be sustainable in terms of natural and built environment impact and also in terms of being sustained by suitable social infra-structure in terms of housing, affordable housing, community led housing, education, health and amenities such as local services and open space. Secondly, it is important that there is rigorous review against deliverability and viability criteria in planning, technical, legal and commercial or financial terms.</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background</p>

<p>Again, the qualitative nature of development will be critical as the plan develops, For example, in the area of housing land allocations, it will be important to address tenure and dwelling type and mix, placemaking and the role of community engagement and community led housing development. (Please refer to comments below).</p>	
<p><b>Evidence Base</b></p> <p><b>11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</b></p> <p><b>12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</b></p>	
<p>The evidence bases being used are robust and of particular importance will be the Local Housing Market Assessments to determine the quantum, nature and type of housing to be developed.</p> <p>In addition to the evidence sources identified, it is suggested that perhaps a review or audit of current and proposed investment plans of various statutory bodies is undertaken as these can have a significant impact on the deliverability of the RLDP aspirations. This could include: utility services eg Dwr Cymru Welsh Water, transport, NRW (Flood Risk and Water Quality).</p> <p>The objectives for the RLDP are wide ranging and inclusive. However, whilst many of the objectives touch on the area, it is suggested that perhaps an overt and explicit placemaking objective is stated.</p>	<p>Noted As part of this process the LDP team will continue to work with partners, during the preparation of the replacement LDP to ensure any amendments to policy reflect the opportunities identified.</p>
<p><b>Other Comments</b></p>	
<p>In offering some further comments, Cwmpas would wish to outline some themes and issues around community led housing that could be developed within the RLDP and to the extent of defining specific policies within the RLDP for which there is precedent and proven track record elsewhere within the United Kingdom.</p> <p>For a scheme to be 'community led', the community must be integrally involved throughout the process of the development in terms of identifying the need and maintaining a strong involvement in delivering housing to meet that need even though in some cases the community does not necessarily have to initiate and manage the development process itself or build the homes themselves. Indeed, there are many ways for people to be involved in meeting their own housing needs. Community groups may respond to housing needs in their local area and seek to deliver their own homes. Local authorities, landowners, Registered Social Landlords (RSLs) or small builders may seek to provide housing that benefits the local area in perpetuity, and work with the community to enable this to happen. However, all such community led housing schemes are characterised by providing housing for the local community that is affordable and available in perpetuity and by providing far greater certainty to local communities as to who the housing will be occupied by and potentially offers new opportunities and benefits for sustainable local economic, social and environmental development.</p> <p>Finally, it is important to recognise that community led housing is not a case of 'one size fits all' as it can come about for a number of reasons and take a number of different forms. For example, co-housing is a design methodology used by intentional communities to create spaces that promote connectivity and</p>	<p>Noted</p>

<p>togetherness; housing co-operatives are housing organisations controlled, managed and owned by its members; and Community Land Trusts (CLTs) are legal entities set up by communities to provide and protect assets of community value such as genuinely affordable housing. As such, no two projects are the same. Community led housing can be adapted and moulded to create bespoke solutions that address particular issues and factors, whether socially or spatially, that have led to a group forming.</p> <p>In summary, community led schemes share three common principles: a requirement that meaningful community engagement and consent occurs throughout the process; the local community group or organisation own, manages or stewards the homes and in a manner of their choosing; and a requirement that the benefits to the local area and/or specified community are clearly defined and legally protected in perpetuity. More specifically, community led housing directly addresses the issues and challenges within Newport in terms of:</p> <p>Rebalancing demography through the creation of affordable community led housing that will create opportunities to retain and attract young people and thereby foster social and economic sustainability of the communities of Newport;</p> <p>Addressing inequality by increasing the amount, quality and choice of affordable housing options within the City;</p> <p>Addressing the climate emergency with net zero housing developments that are inherently sustainable in terms of build standards and technology, founded upon placemaking principles, reduce dependence of private modes of transport in favour of active travel and which provide green spaces and local food production opportunities; and,</p> <p>Addressing the nature emergency where preservation and enhancement of the biodiversity qualities of a site is a key component.</p>	
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GSO 014 - Charlotte Foulston - 00848

Question / Response	Officer Response
<p><b>Growth Options</b>  <b>Growth Scenarios -</b></p> <ol style="list-style-type: none"> <li><b>Are there any scenarios that have been discounted which should be considered further, and why?</b></li> <li><b>Which of the options do you feel is the most appropriate, and why?</b></li> </ol> <p><b>Assessment of Growth Options Against RLDP Objectives -</b></p> <ol style="list-style-type: none"> <li><b>Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</b></li> </ol>	
<p>When considering different growth options, I would ask that the need for an integrated transport system is factored in which includes local rail services. I would like to know why the previous LDP mentions re-opening a rail station in Caerleon but the current plan doesn't. My reasons for pursuing this as an option are:</p>	<p>The Newport Local Development Plan currently includes policy T1, which supports all proposals for new stations, including a station at Caerleon. The role of the Local Development Plan is to facilitate new and improved stations,</p>

<p>-Reduction in local vehicle traffic and the associated poor air quality (well documented) which affects not only residents but the unique archaeology associated with Caerleon</p> <p>-An alternative means for tourists to visit this historic site without putting additional pressure on existing road infrastructure and the already very limited parking options. Caerleon, and by extension Newport, needs to attract visitors to what should be a UNESCO World Heritage Site. The importance of this Roman town cannot and should not be underestimated. This aspect of development has been underrepresented in previous plans.</p> <p>-Encourages local residents to leave their cars at home and walk, which has wider health benefits and helps build community cohesion.</p> <p>-Reopening the railway station in Caerleon would bring employment opportunities not limited just to the station.</p> <p>-The line already serves Newport to Cwmbran; New Inn's railway station is being developed creating further rail link options. It would be possible to travel anywhere in the country to and from Caerleon given these links.</p>	<p>but it does not directly allocate these or determine the location of new stations.</p> <p>As part of this process the LDP team will continue to work with partners, including Welsh Government and Transport for Wales, during the preparation of the replacement LDP to ensure any amendments to policy T1 reflect the opportunities identified by the appropriate transport strategies and that our development strategy seeks to support the delivery of strategic and local transport improvements.</p>
<p>When considering the growth options, I would ask that the unique nature of Caerleon's Roman heritage be taken into account. As mentioned above, this Roman fort town is incredibly important and could be developed far more strategically to attract tourism and its associated revenues and opportunities.</p>	<p>The Growth options have been a high level in relation to their contribution to the emerging objectives of the plan, including:</p> <p>“Historic Environment- To preserve, enhance and realise the value of Newport’s heritage resources, through investment, interpretation and maximisation of those opportunities provided by the distinctive historic environment and archaeological assets.”</p> <p>The issues of the historic environment will be considered in further detail as the plan progresses.</p>
<p><b>Employment Land Review</b></p> <p><b>Recommendation One -</b></p> <p><b>4. Is this requirement appropriate for Newport?</b></p> <p><b>5. Should it be different and if so, why?</b></p> <p><b>Recommendation Two -</b></p> <p><b>6. Should some sites be removed from the employment supply? Why?</b></p> <p><b>7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.</b></p>	
<p>Brown field sites should be the first consideration for any new development; decommissioned industrial sites already have the infrastructure in place, e.g. roads, utilities, to support further development in the first instance.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred</p>

<p>Newport's past industrial legacy has already left its mark on the landscape; development should not encroach onto existing green field sites.</p> <p>Newport sits on the edge of some of the most beautiful and biodiverse areas of the country (Brecon Beacon, Usk Valley for instance) and these should be protected for future generations to benefit from.</p>	<p>Strategy Consultation Paper and associated Background Papers.</p>
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**GSO 015 - Great Western Railway - 00771**

Question / Response	Officer Response
<p>Great Western Railway recognises the need to engage with the LDP process and welcomes the opportunity from Newport to engage at this early stage.</p> <p>While Growth options are best discussed by other respondents, GWR supports the need to develop spatial options which can be served effectively by public transport - this is more important to the spatial options than which of the three options proposed is progressed.</p> <p>The public transport offer for development needs to be relevant &amp; appealing for new residents or commercial occupiers and needs to be in place prior to occupation. This is more difficult to achieve if development is located away from existing or proposed public transport corridors, where new development is unlikely to generate passenger or revenue volumes to support ongoing operational costs.</p> <p>An approach which supports development around strategic transport corridors could sustain higher levels and more effective use of public transport resource.</p>	<p>Noted. We look forward to working collaboratively as our plan progress.</p>

**GSO 0016 - Lewis Homes (South Wales) Ltd - 00661**

Question / Response	Officer Response
<p><b>Growth Options</b></p> <ol style="list-style-type: none"> <li><b>1. Are there any scenarios that have been discounted which should be considered further, and why?</b></li> <li><b>2. Which of the options do you feel is the most appropriate, and why? Assessment of Growth Options Against RLDP Objectives</b></li> <li><b>3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</b></li> </ol> <p><u>Background:</u></p> <p>Chapter 3 of the Growth and Spatial Options Document presents and seeks feedback on a series of growth scenarios which would in turn inform the housing requirement and employment land requirement. Initially, 12 scenarios are presented in Table 1 with Table 2 further refining this down to six Growth Options. Lewis Homes has control of, and is promoting for residential development, the site known as "Land at Coal Pit Lane, Castleton". Given Lewis Homes' interest within Newport, the Growth Strategy is only relevant in so much as it informs the housing requirement with matters relating to the required job provision (and associated employment land requirement) not of relevance.</p>	<p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p> <p>Noted.</p>



<p><u>Context:</u> National planning policy is clear as to how a housing requirement should be formulated with Paragraph 4.2.6 of Planning Policy Wales Edition 11 (February 2021) stating that: "The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans. These should be considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also be given to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities." From the above text it is clear that: 1. Household projections should be used as the starting point for establishing the housing requirement; but that 2. Other elements of the evidence base should also underpin the housing requirement; and that also 3. The wider political, economic, social, and environmental context, combined with what the Local Planning authority (LPA) want the Replacement Local Development Plan (RLDP) to achieve, should be considered.</p>	
<p><u>Point 1 - Household Projections</u> Lewis Homes suggest that the correct projection to use is the WG-2018-HIGHPOP (Growth Option 2). The reason for this is that, unlike the WG-2018-Principal or the WG-2018-LOWPOP projections, it is re-based to the 2021 Census. This is the right starting point because it makes use of the most recent set of household projections (2018-based) whilst responding to the actual findings of the 2021 Census which provide an incredibly accurate snapshot in time that is more recent than the 2018-based projections. Put another way, it reflects the actual position on the ground, and the projections associated with it, at a fixed point in time rather than a wholly projected scenario. This is particularly important in the case of Newport City Council (NCC) where there is a significant under estimation of the position compared to the actual findings of the 2021 Census. This is articulated in the "LDP Demographics" Paper prepared by Edge Analytics on behalf of NCC which at Paragraph 2.25 states that: "Newport has seen the largest population increase between the 2020 MYE and 2021 Census population compared to other Welsh authorities (2.0%) (Figure 20). Only two out of the 22 Welsh authorities have seen an increase between the two population figures (Powys and Newport), with the rest of the authorities showing population declines." Taking the above together, it would be the right approach for LPAs, in general, to use the WG-2018-HIGHPOP going forward and this is particularly important for an LPA such as NCC where there is a significant diversion between the 2018-based projections and the 2021 Census.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

Point 2 - Evidence Base Elements:

Two of the options presented in Table 2 of the Growth and Spatial Options Document are the PG-Short Term and PG-Long Term scenarios (the PG-Long Term is also presented as a Growth Option in Table 2). These scenarios use the ONS 2020 Mid-Year Estimate and then calibrate either to assume migration rates over the last five years (in the case of the PG-Short Term) or 19 years (PG-Long Term).

The below table has been put together using the ONS' "Local Area Migration Indicators" dataset from September 2021 and shows the net balance of inflow and outflow over the last ten years to and from Newport from other parts of the UK. In this case, it is calculated by subtracting the number of people that leave NCC to move to another local authority from the number of people that move to NCC from another local authority:

Year,	Net Internal Inflow:
2010-2011	90
2011-2012	-197
2012-2013	-357
2013-2014	-485
2014-2015	-11
2015-2016	271
2016-2017	1098
2017-2018	1211
2018-2019	445
2019-2020	1118

The table shows a changing balance over the last 10 years, from a period where there was a net outflow of people from Newport to a situation since 2015-2016 where there has been a sustained and significant net inflow of people from Newport. Assuming a household size of 2.3 people, the net inflow would represent an additional 486 homes per annum for 2019/2020. The 2018/2019 figure is an anomaly as a result of COVID19 - something that is recognised in Paragraph 2.15 of the "LDP Demographics" Paper.

The "LDP Demographics" Paper prepared by Edge Analytics explains why it is the case that there has been a net inflow since 2015/2016 at Paragraph 2.14 which states that:

"Likely factors driving this increase include the rate at which new homes have been built, the removal of the Severn Bridge toll in 2018 and the introduction of ONS' Higher Education Leavers Methodology (HELM)."

The fact that this the greatest net inflow is from Bristol, North Somerset, and South Gloucestershire (Figures 14 and 15 of the LDP Demographics Paper) helps to confirm this conclusion.

The position with regards to the Severn Bridge tolls is fixed - the tolls have been removed and there is no indication of them being re-introduced. There is therefore no structural reason as to why the net inflow of people would reverse in coming years.

Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers. To be passed to Edge for further consideration.

<p>Lewis Homes do not suggest it would be the right approach for either of the PG scenarios to be chosen as a Growth Option as ultimately they look at previous trends rather than future projections to come over the RLDP plan period, but it is clear that the level of UK based migration is such that a significant uplift on the selected demographic scenario should be applied and that this should be based on a PG option that considers the level of net internal migration over the last four years since the tolls have been removed (excluding the year effected by the COVID19 pandemic) rather than a longer time window. This should be applied as a "multiplier" on top of Growth Option 2.</p>	
<p><u>Point 3 - Wider Political, Economic, Social, and Environmental Context:</u>  The main document that sets out how Newport should be seen in the context of the wider South East Wales region is Future Wales: The National Plan 2040. The status of Future Wales: The National Plan 2040 and what it means for Newport is set out in Section 2.1 of the Growth and Spatial Options document.  There's no need to repeat what is said in either document here but it is clear from Policy 33 (National Growth Areas - Cardiff, Newport, and The Valleys) that Newport should:</p> <ul style="list-style-type: none"> <li>- Have an increased strategic role for sustainable long term growth</li> <li>- Be a growth pole for new housing in the eastern part of South East Wales</li> <li>- Work alongside neighbouring authorities (both in South East Wales and England) to achieve this.</li> </ul> <p>The implications of this are that any Growth Option selected must be aspirational and this is recognised in Section 3.1 of the Growth and Spatial Options document which, on Page 12, explains that a number of the options suggested in Table 1 have been dismissed due to their low scale of growth not being in conformity with Future Wales: The National Plan 2040.  The status of Newport in Future Wales: The National Plan 2040 is such that there is further justification for the selection of Growth Option 2 as a starting point given that it is aspirational in nature whilst the encouragement to work with neighbouring local authorities suggests that net inflow into Newport from neighbouring authorities should be welcomed and planned for through the incorporation of a PG scenario.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><u>Assessment of Growth Options Against RLDP Objectives:</u>  Appendix A of the Growth and Spatial Options Document provides an appraisal of the performance of the six Growth Options against the 10 RLDP Objectives, in essence allowing to create a matrix that allows for comparison between the various options. This is built upon further in Appendix A of the Document. Lewis Homes' concern is that the assessment undertaken as part of Table 3 and in Appendix A assumes that a certain Growth Option will have an "Amber" or even "Red" impact when the selection of appropriate sites which are environmentally and technically acceptable (or incorporate appropriate mitigation, compensation, and enhancement to achieve this) can mean that they can be delivered without a negative impact (i.e. with a "Green" or, at worst, "Amber" impact). In this sense, it is essential to stress that the comprehensive submission that Lewis Homes made as part of the Call for Sites</p>	<p>Noted. This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.</p> <p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>

<p>demonstrated that "Land at Coal Pit Lane, Castleton" could be delivered in a way which is technically and environmentally sound such that the performance against many of these objectives could instead be considered to be "Green" in this context.</p>	
<p><u>Extent of Flexibility Allowance:</u>  Paragraph 5.58 of Edition 3 the Development Plans Manual (March 2020) is clear that there is a requirement for a flexibility allowance to be added on top of the housing requirement to derive the number of homes than RLDP should plan for. This is in the interest of ensuring that sufficient housing is delivered when some allocated sites either are not delivered or deliver less home than anticipated. Paragraph 5.59 of Edition 3 the Development Plans Manual is clear that the extent of the flexibility allowance should be informed by local issues with 10% as a starting point (i.e. as the minimum). Lewis Homes recognise that the extent of the flexibility allowance will be determined considerably later in the RLDP preparation stage, likely at Deposit stage and that it is inappropriate to comment too much on this at this time. That said, Indicator OB4 MT3 of the Annual Monitoring Report (October 2022) for the period from April 2021 to April 2022 recognised a cumulative shortfall in housing delivery against the LDP's housing trajectory. Historic performance against this indicator is presented in the table below:  Year/% Delivery Against Cumulative Required Rates  2015 -5%,  2016 3%,  2017 -2%,  2018 -6%,  2019 -9%,  2020 -12%,  2021 -14%</p> <p>Importantly, this is against the housing requirement of 10,350 homes and not the 11,623 homes that the adopted LDP plans for. In essence, in 2021 where the rate is a -14% rate, this is 14% below the housing requirement but 26% below the number of homes that were planned for which incorporated the 12% buffer in the adopted LDP. Even at this stage it is clear from the above that the 12% buffer in the adopted LDP is entirely inadequate and a greater buffer should be incorporated for the RLDP.</p>	<p>Noted, the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers provide greater detail on this.</p>
<p><b>Lewis Homes (South Wales) Ltd - 00661 Spatial Options</b>  <b>8. Which of these options do you feel is the most appropriate, and why?</b>  <b>9. Are there any other spatial distributions that should considered, and if so, why?</b>  <b>10. Are there any other matters that should be given consideration when assessing these?</b></p>	
<p><u>Background and Policy Context:</u>  Chapter 4 of the Growth and Spatial Options Document presents four Spatial Options as to how the requirements outlined in Chapters 2 and 3 should be distributed spatially. Four options are presented - one which would be to focus new housing on previously developed land, a second which would be to</p>	<p>Noted</p>

focus on a series of greenfield allocations on the edge of the urban boundary, a third of directing growth to nine identified villages, and a fourth which is a hybrid of the previous three options.

Commentary on Reliance on Previously Developed Land Approach:

The first paragraph in Section 5 of the Growth and Spatial Options Document is presented below:

"There is a need to prioritise the re-use of previously developed land (PDL). The adopted strategy supports a PDL-led approach, with a considerable amount of development being delivered on previously developed land since the adoption of the LDP in 2015. While the merits of continuing this strategy are understood, there is some concern that previously developed land is a finite resource and the availability of sites may not be as buoyant as it was or the reuse of land for housing may require the de-allocation of some employment sites."

Whilst there is no doubt that the delivery of PDL is prioritised in national planning policy, the Growth and Spatial Options Document recognises that there is not going to be sufficient previously developed land available for the continuation of the PDL- led approach taken in the adopted LDP. The first paragraph of Section 5 of Document is clear on this, stating that:

"While the merits of continuing this strategy are understood, there is some concern that previously developed land is a finite resource and the availability of sites may not be as buoyant as it was or the reuse of land for housing may require the de-allocation of some employment sites."

On this basis, the selection of the PDL-led Spatial Option is not going to be sufficient to meet the higher Growth Options (and importantly the Growth and Spatial Options paper discounts the lower Growth Options). There is also a wider point as to whether reliance on a PDL-led strategy is a sufficiently robust Spatial Strategy to ensure that the housing requirement is delivered in full. The adopted LDP relies on a PDL-led strategy and, as set out in connection to the flexibility allowance for the Growth Options questions, this has resulted in a significant shortfall of housing delivery compared to the housing trajectory. Analysis from the Annual Monitoring Report (October 2022) for the period from April 2021 to April 2022 shows that there are 1,189 (equating to 11.5% of the total housing requirement) units that the adopted LDP anticipated to be delivered on brownfield sites in the adopted LDP plan period but now are not expected to be delivered prior to its end date in 2026.

From the above, it is clear that there is not enough PDL land for the implementation of a PDL-led Spatial Strategy and that, even if there was, the implementation of a PDL-led approach would likely result in a shortfall in delivery against requirement.

Lewis Homes therefore suggest that:

- Any 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;
- 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; and

<p>-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>	
<p><u>Suggested Approach:</u>  The higher Growth Options (including the modified Option 2 that Lewis Homes are suggesting) that are set out in the Growth and Spatial Options Document are unlikely to be able to be met in their entirety through either the "Village Focus" Spatial Option or the "Urban Expansion" option and therefore it is suggested that the "Hybrid" Spatial Option is really the only suitable Spatial Option that can deliver the higher Growth Options that are suggested and continue to perform strongly against the RLDP's objectives. A part of this Spatial Option, Lewis Homes emphasise the role that certain sustainable Villages should play as part of this Spatial Option. By their very nature, the Villages are located throughout the NCC, and directing growth to the more sustainable Villages will mean that housing is dispersed and will likely be delivered by a greater number of different developers compared to an option which concentrates growth in a smaller number of locations. This is beneficial for consumer choice - both in terms of the location that someone chooses to live and the type of home that they want to buy. This should be seen as being particularly attractive in the context of the adopted LDP which, by virtue of the PDL-approach that it takes, did not allocate additional sites in any of the nine villages identified as part of the "Village Focus" Spatial Option - instead in the Villages either rolling over historic allocations in the Unitary Development Plan or relying on previously developed sites that benefited from planning permission and the time the current LDP was adopted.  Page 56 lists nine Villages that new development would be directed to if the "Village Focus" Spatial Option was selected and would presumably constitute the "Village" element of the "Hybrid" Spatial Option. "Castleton and Marshfield" appear to have been considered together and it is noted that this has been the case in the adopted LDP (most notably with regards to the Inset Maps). In that sense, it is assumed that the "Broad Location for New Growth Under Housing Scenario" identified with the "Village Focus" Spatial Option as being located in Marshfield relates to both Castleton and Marshfield and does not indicate a preference of one over the other to accommodate new housing.  [MAP ATTCHED -extract from G&amp;SO Paper]  If the approach in the adopted LDP continues to be taken of considering the two together, it is important that this does not prevent new housing being allocated in both (rather than either) settlement.</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background</p>
<p>Whilst Lewis Homes support an approach that directs new housing to Villages in general, it is apparent that there are substantial differences between the various Villages with regards to sustainability, accessibility, and overall ability to accommodate new housing. Whilst presumably the evidence base will include an appraisal of the sustainability of these Villages, the below table provides a "Red" and "Green" assessment of the availability of certain services within each.</p>	<p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>

Village	Primary School	Local Shop	Bus Stop	Village Hall	Public House	POS	Doctors / Pharmacy
Castleton and Marshfield	Green	Green	Green	Green	Green	Green	Green
St Brides	Red	Red	Red	Green	Red	Red	Red
Bishton	Red	Green	Red	Green	Red	Red	Red
Llanwern	Green	Green	Red	Green	Red	Green	Green
Underwood	Green	Green	Green	Green	Green	Green	Green
Llanvaches	Red	Red	Red	Green	Red	Green	Red
Parc Seymour	Red	Green	Green	Red	Red	Green	Red
Christchurch	Red	Green	Green	Green	Green	Green	Red
Caerleon	Green	Green	Green	Green	Green	Green	Green

The Deposit Plan will include a review of the urban and village boundaries. The Settlement Assessment Background Paper provides a village appraisal.

From the above, it is clear that Castleton and Marshfield is one of the three most sustainable and accessible Villages and has a considerably broader range of services than settlements such as St Brides, Bishton, Llanvaches, and Parc Seymour. Lewis Homes therefore suggest that the proportion of new housing directed to each Village should be dependent on its accessibility, sustainability, and range of services with the more sustainable Villages, such as Castleton and Marshfield, accommodating a greater number of new homes.

Not only is Castleton and Marshfield one of the more sustainable Villages, Castleton is also a fundamentally good location for new housing for the following reasons:

- Castleton is outside of the Green Belt in the adopted LDP (importantly, unlike Marshfield) and, unlike other villages north of the M4, -Castleton is not within the "Assumed Area Under Consideration for New Green Belt"
- There are a range of services nearby within Castleton and Marshfield that can be accessed by active travel and the improvements to the A48 proposed as part of the "Cardiff to Newport Active Travel and Bus Corridors" consultation by Transport for Wales will improve this
- Directing new housing to Castleton and Marshfield would assist with spatially distributing new housing given that seven of the nine Villages are in the eastern part of NCC, as are many of the sites that will be rolled over from the adopted LDP; and
- There are sites which are suitable, deliverable, and viable - Lewis Homes has demonstrated that "Land at Coal Pit Lane, Castleton" site is one such example.

**GSO 017 - Councillor Chris Reeks - 00757**

Question / Response	Officer Response
<p><b>Growth Options</b>  <b>Growth Scenarios -</b>  <b>1. Are there any scenarios that have been discounted which should be considered further, and why?</b></p>	

<p><b>2. Which of the options do you feel is the most appropriate, and why?</b>  <b>Assessment of Growth Options Against RLDP Objectives -</b></p> <p><b>3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</b></p>	
<p>The population growth is most appropriate, but it needs to be higher, the influx of people already into the city has outstripped the predictions and this will only continue to rise. Employment led is not appropriate as Newport is more of a transient city housing people who work outside of the area.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><b>Employment Land Review</b>  <b>Recommendation One -</b></p> <p><b>4. Is this requirement appropriate for Newport?</b>  <b>5. Should it be different and if so, why?</b></p> <p><b>Recommendation Two -</b></p> <p><b>6. Should some sites be removed from the employment supply? Why?</b>  <b>7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.</b></p>	
<p>Q4 again the requirement is inadequate for Newport, a recent case in point where a company wanted to relocate to Newport and open a factory to employ local people highlighted the issue of very little suitable warehouse space available and the company is now looking outside of the borough completely. This situation will be exacerbated by the influx of people, some of whom (but not all) will seek employment in the city.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><b>Spatial Options</b></p> <p><b>8. Which of these options do you feel is the most appropriate, and why?</b>  <b>9. Are there any other spatial distributions that should be considered, and if so, why?</b>  <b>10. Are there any other matters that should be given consideration when assessing these?</b></p>	
<p>The spatial options need to consider a mix of all three options of PDL/Village/Urban, with the repurposing of the city centre to become a more eclectic mix of living and working properties to regenerate the economy as well as providing more living space for residents. Each one on its own will not solve the problem as it will lead to over-population in a particular and more of the same problems we face across the city currently.</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background</p>

**GSO 018 - Mr Paul J Cromwell - 00251**

<b>Question / Response</b>	<b>Officer Response</b>
<p>As per your letter dated 24th Jan 2023, I would like to comment regarding the local development plan which years ago I have put into the UPD and more recent LDP for my ground in Redwick. I would like to put in this ground again to the LDP, I cannot see why last time of Newport City Council why they have taken away the boundaries of six villages that I feel should be entitled to have their boundaries back, and</p>	<p>Noted. The Deposit Plan will include a review of the urban and village boundaries. The Settlement Assessment Background Paper provides a village appraisal.</p>



<p>therefore these boundaries should not have been taken away in the first place. There has been no growth in these villages since the last LDP was introduced 5 or 6 six years ago.</p> <p>I know that Newport has brown field sites, some which are heavily contaminated over many years and some of these sites cannot be brought into residential use because of circumstances as previously stated ie heaverly contaminated ground.</p> <p>The rural villages that fall within Newport City Councils authority have not considered the young people born and brought up in these villages and should be entitled for parcels of ground in these villages to be put into the LDP, also like myself who have owned ground in Redwick the boundary should consist of new housing falling within that boundary that should consist of the new LDP going forward this time around.</p> <p>I look forward to seeing your responses this time and hopefully unlike the past I could see development on my ground.</p> <p>Last time I did go before the inspectorate and if no consideration from Newport City Council is considered this time I will automatically want to go the Inspectorate this time around.</p>	<p>The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.</p>
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**GSO 019 - Elm Land Ltd - 00633**

Question / Response	Officer Response
<p><b>Growth Options</b>  <b>Growth Scenarios -</b></p> <ol style="list-style-type: none"> <li><b>Are there any scenarios that have been discounted which should be considered further, and why?</b></li> <li><b>Which of the options do you feel is the most appropriate, and why?</b></li> </ol> <p><b>Assessment of Growth Options Against RLDP Objectives -</b></p> <ol style="list-style-type: none"> <li><b>Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</b></li> </ol>	
<ol style="list-style-type: none"> <li>There are no scenarios that have been discounted that should be considered further.</li> <li>The higher housing growth scenarios published in the growth and spatial options paper accurately reflect that the RLDP has to confirm with the Future Wales' spatial strategy. The RLDP should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure.</li> </ol> <p>Option 1 (Dwelling-led SYR) is the most appropriate of the growth scenarios to fulfil Future Wales. The Welsh Government is determined to see development and growth in Newport, allowing the city to fulfil its potential as a second focal point for the region. Highly skilled employment opportunities in the transport and digital communications sectors should be catalysts for further economic investments.</p> <p>Option 1 proposes the highest amount of dwellings across the local authority. This is essential to enhance Newport's economic role. The Dwelling-led 5YR scenario has a higher but realistic population change than Option 2 WG-2018-HIGHPOP. This is the step change necessary to achieve the National Plan.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

<p>Option 1 is the only option with housing supply above the current LDP strategy, therefore, reflecting Newport's focus for growth role established by the Future Wales National Plan 2040.</p> <p>3. Option 1 will overall bring a neutral contribution to the RLDP objectives; population and communities, health and wellbeing, equality, diversion and inclusion and transport and movement. The risk of not achieving a step change for the City and delivery of growth as envisaged in Future Wales should be a matter for consideration when assessing the scenarios. To de risk the plan the Preferred Strategy should be based upon a robust assessment of the capacity to deliver Option 1. Delivery and viability should be embedded in the next stages of the candidate site process. An adequate flexibility allowance should be applied to de risk the plan.</p> <p>The preferred strategy should be based on an objective assessment of the role and function of places within Newport in line with the search sequence and National Sustainable Placemaking Outcomes, as set out in PPW. This will create inclusive, connected, adaptable and accessible communities that are cohesive and ensure Newport's potential is realised.</p>	
<p><b>Employment Land options</b></p> <p><b>Recommendation One -</b></p> <p><b>4. Is this requirement appropriate for Newport?</b></p> <p><b>5. Should it be different and if so, why?</b></p> <p><b>Recommendation Two -</b></p> <p><b>6. Should some sites be removed from the employment supply? Why?</b></p> <p><b>7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.</b></p>	
<p>4. Recommendation 1 is the minimum requirement to fulfil the expectations of Future Wales for Newport to be the focus for strategic economic growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure.</p> <p>5. Yes, it should probably be different. If the supply to match the requirement is to include the sites identified in the ELR the requirement should be higher.</p> <p>Excluding land East of the Queensway the supply amounts to just over 90 hectares. However, just over 40 hectares is ring fenced for the expansion of Eastman (Solutia). It cannot be considered as readily available to meet the broader employment land requirement to fulfil the growth strategy. Furthermore, the ELR assesses the Accessibility, Environmental Factors and Market Attractiveness of nine sites (includes East of Queensway). Three sites are considered to score highly, amounting to just under 48 hectares.</p> <p>The requirement should be for 77 hectares of readily available, accessible, and attractive employment land. Given a site is ring fenced for Eastman (Solutia) the requirement should be for 117 hectares.</p> <p>6. Given the need to fulfil the local and sub regional (CCR) employment sites, other than land East of Queensway, should not be removed from the employment land supply.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

<p>7. TAN 23: Economic Development and PPW state that an existing employment site should only be released for other uses if other priorities, such as housing need overrides more narrowly focused economic considerations. The economic considerations are of national significance as per the growth strategy (Future Wales).</p>	
<p><b>Spatial Options</b></p> <p><b>8. Which of these options do you feel is the most appropriate, and why?</b></p> <p><b>9. Are there any other spatial distributions that should be considered, and if so, why?</b></p> <p><b>10. Are there any other matters that should be given consideration when assessing these?</b></p>	
<p>8. With regard to spatial options, a hybrid approach is favoured with a mixture of previously developed land, sites on the edge of the urban boundary and sites at surrounding existing villages. The Candidate Site between Church Lane and Marshfield Road at Marshfield could contribute to the Village Focus spatial option too. The current status of the site as per the adopted LDP is a greenfield site, adjoining the settlement boundary. Where there is a need for sites and there is no previously developed land or underutilised sites, consideration can be given to suitable and sustainable greenfield sites within or on the edge of settlements. A balance of previously developed land, sites on the edge of the urban boundary and sites at surrounding existing villages will ensure a range of locations and size of sites. A range of sites de risks the delivery of the RLDP.</p> <p>The hybrid approach scores highly against the RLDP objectives for Economy and Employment, health and wellbeing and biodiversity and geodiversity. Marshfield has a number of day-to-day facilities including a post office, village hall, church and several public houses. The Primary School is an approximate 15-minute walk away.</p> <p>There are several bus stops along Marshfield Road providing services to Newport and Cardiff. St Mellons, 3 miles to the east, has a range of facilities and amenities, including retail, employment, education, healthcare and a Tesco supermarket.</p> <p>In addition to a rounding off of the existing village settlement, the existence of the adjacent allotments provides a natural defensible boundary to the site ensuring that there is no possibility for 'urban/village sprawl'.</p> <p>Further, there is good developer interest from small to medium size house builders, a sector which Welsh Government policy has been very keen to support and see deliver more homes throughout Wales.</p> <p>9. The four spatial distributions provided cover the full range of options from urban to rural land use for development, with the addition of a mixture of both.</p> <p>10. To de risk the delivery of the plan as per the LDP Manual 3 a further matter for consideration is the delivery risk associated with each of the spatial options. Sites of a modest size at village locations provide a low-risk option to fulfil the growth required.</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.</p>
<p><b>Evidence Base</b></p> <p><b>11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</b></p>	

<b>12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</b>	
<p>11. The current evidence base used to inform the development of the preferred growth and spatial options strategies is sufficient and critically encapsulates Newport as a growth in National planning policy.</p> <p>12. It is important that the RLDP takes a pragmatic approach and provides a good balance between housing and employment growth opportunity. There needs to be a strong focus on those identified areas for growth in the paper. A good range of different house types and tenures in a range of locations should be supported through the RLDP, taking advantage of available land on the edge of Newport to help to deliver an appropriate scale of growth for the City.</p>	Noted

GSO 020 - Richard Martin - 00849

Question / Response	Officer Response
<b>GROWTH OPTIONS:</b> <b>Growth Scenarios -</b> <b>1. Are there any scenarios that have been discounted which should be considered further, and why?</b> <b>2. Which of the options do you feel is the most appropriate, and why?</b> <b>Assessment of Growth Options Against RLDP Objectives -</b> <b>3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</b>	
<p>1. No. Lower growth scenarios would not be in line with Welsh Government direction. Higher growth scenarios would be unsustainable and would place unmanageable pressures on infrastructure.</p> <p>2. Option 2 is most likely to achieve sustainable growth over the whole plan period and appears, at this stage of analysis, to imply most positive outcomes and least negative outcomes.</p>	Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.
<p>3. There is some evidence tracked in the Annual Monitoring Reports (but not the latest one because of lack of data on multiple deprivation) that the previous plan period of high , housing led growth has been paralleled by a growing deprivation in Newport and a widening social and economic gap between the most deprived areas and the least deprived. Is this an unintended consequence of high housing growth and its location, tenure and affordability or the product of wider forces in the economy and society? Is the issue of social segregation and cohesion a matter for a Local Development Plan - if not, how can this issue be addressed and influenced by the City Council?</p>	Noted, the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers provide greater detail on this.
<b>SPATIAL OPTIONS:</b> <b>8. Which of these options do you feel is the most appropriate, and why?</b> <b>9. Are there any other spatial distributions that should considered, and if so, why?</b> <b>10. Are there any other matters that should be given consideration when assessing these?</b>	

<p>8. Probably the hybrid option. The Annual Monitoring Report for 2022 indicates that 93% of new homes have been delivered on PDL land. We do not feel that this level of PDL development can be sustained over the future plan period. Also local experience shows that the abnormal costs of developing some PDL land cannot accommodate the required level of Section 106 investment.</p> <p>Whatever spatial option is preferred, our local experience is that due weight must be given to the capacity of the local infrastructure to meet the needs of an increasing population and there should be an explicit assessment of the likelihood that the infrastructure will improve alongside housing growth - if this likelihood is low then well-being objectives will not be met</p> <p>9. A scattered growth option - smaller housing developments in many locations - would not meet the Objectives. A single 'new settlement' is worthy of consideration, depending upon its location, in order to meet a full range of Objectives in one place.</p> <p>10. The report states that '...land availability will need further consideration when determining the preferred spatial option.' The lack of information about land availability, including the list of candidate sites, crucially limits the ability of the general public to assess the options identified. It is accepted that such information will inevitably focus attention on local issues rather than strategic considerations. However it is difficult to assess the differences between the identified spatial options without some general information on land availability and the willingness of landowners and developers to bring it forward. In South Torfaen, the availability of full information about candidate sites has enabled a wide and informed debate about the strategic viability of large scale development in this area adjacent to Newport, as well as raising local implementation issues which are probably not relevant at this stage of plan-making.</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.</p> <p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>
<p><b>EVIDENCE BASE:</b></p> <p><b>11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</b></p> <p><b>12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</b></p>	
<p>11. Is there any empirical evidence about where the people, who have moved to live in the new homes built in the last 10 years, are employed and how they currently travel to work? It is difficult to assess the stated importance of reducing commuting and developing a more self-contained city if we don't know enough about the current base-line and how future housing-led growth will impact on it.</p>	<p>The Demographic Evidence, Employment Land Review (NB not executive summary) detail what key economic factor have been considered.</p>
<p>12. We would support the introduction of a green belt to the north and west of Caerleon, and in other appropriate parts of the city. This provides an essential balance to further housing-led growth. It is vital that the green belt concept is also applied to areas adjacent to the Newport boundary with Caerphilly, Torfaen and Monmouthshire.</p> <p>It is accepted that the spatial options maps are indicative. However, there is strong local feeling that the proposal for a railway station in Caerleon, included in the previous plan, appears to have been dropped. We consider that this issue should remain open for public discussion on the basis of providing a further</p>	<p>Noted</p> <p>The Newport Local Development Plan currently includes policy T1, which supports all proposals for new stations, including a station at Caerleon. The role of the Local Development Plan is to facilitate new and improved stations, but it does not directly allocate these or determine the location of new stations.</p>

<p>important travel option for the local community although we do not consider that the Future Wales statement, that development around new and improved metro stations should be high density and mixed use, is appropriate in the case of every new station, including Caerleon.</p>	<p>As part of this process the LDP team will continue to work with partners, including Welsh Government and Transport for Wales, during the preparation of the replacement LDP to ensure any amendments to policy T1 reflect the opportunities identified by the appropriate transport strategies and that our development strategy seeks to support the delivery of strategic and local transport improvements.</p>
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**GSO 021 - Councillor Stephen Cocks - 00737**

Question / Response	Officer Response
<p><b>Growth Options</b>  <b>Growth Scenarios -</b>  <b>1. Are there any scenarios that have been discounted which should be considered further, and why?</b>  <b>2. Which of the options do you feel is the most appropriate, and why?</b>  <b>Assessment of Growth Options Against RLDP Objectives -</b>  <b>3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</b></p>	
<p>Newport is a town in need of regeneration. The decline of the city's industrial base, together with years of austerity has resulted in a decline in social and economic wellbeing and a decline in the physical environment. Economic growth is vital and this favours job creation. However, there needs to be a balance between dwellings and jobs. A high proportion of houses to jobs will increase commuting. There is already a growing trend on people moving into Newport who work in England.</p> <p>Transport issues should play a far greater part in the replacement plan. Newport is the site of what is recognised as Wales' more serious road traffic congestion issue, on the M4. This is a major issue locally, but also nationally. It undoubtedly impacts on the attractiveness of Newport and South Wales as a business location. It also has a major environmental impact, particularly in relation to air pollution. It is difficult to understand why no scenario does not rate transport as red. The most appropriate options are 2 or 3.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p> <p>As part of this process the LDP team will continue to work with partners, including Welsh Government and Transport for Wales, during the preparation of the replacement LDP to ensure policy reflect the opportunities identified by the appropriate transport strategies and that our development strategy seeks to support the delivery of strategic and local transport improvements.</p>
<p><b>Employment Land options</b>  <b>Recommendation One -</b>  <b>4. Is this requirement appropriate for Newport?</b>  <b>5. Should it be different and if so, why? Recommendation Two -</b>  <b>6. Should some sites be removed from the employment supply? Why?</b></p>	

<b>7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.</b>	
Adequate land needs to be earmarked to accommodate forecast growth, but any surplus should be assigned to enhancing Newport's physical environment. In particular there is a need to enhance many urban areas with green spaces. Some. areas are dominated by old unattractive buildings and derelict industrial land. Newport should be a much greener city. The above favours recommendation 2.	Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.
<b>Spatial Options</b>	
<b>8. Which of these options do you feel is the most appropriate, and why?</b>	
<b>9. Are there any other spatial distributions that should be considered, and if so, why?</b>	
<b>10. Are there any other matters that should be given consideration when assessing these?</b>	
It is difficult to see how one approach will be appropriate to all locations and a hybrid model seems most appropriate. Transport issues will need to be a key part of decision making if commuting by car is not to increase.	Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.
<b>Evidence base</b>	
<b>11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</b>	
<b>12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</b>	
Transport needs to have much more prominence in the plan. The Burns Report includes some very welcome developments, particularly in relation to active travel. However, none of its proposals will solve the issue of congestion on the M4. On the contrary, growth plans will exacerbate the problem. Rail travel in particular should be made much easier. There needs to be a commitment to expanding the network of railway stations. There are already proposals for stations in such locations as Magor, Llanwern, Celtic Springs etc. There should also be a commitment to a station in Caerleon, preferably on the current St Cadocs site. This is an ideal location for a "walkway", active travel site and would serve a population which overwhelmingly commutes to work.	Noted. The role of the Local Development Plan is to facilitate new and improved stations, but it does not directly allocate these or determine the location of new stations.  As part of this process the LDP team will continue to work with partners, including Welsh Government and Transport for Wales, during the preparation of the replacement LDP to ensure any amendments to policy T1 reflect the opportunities identified by the appropriate transport strategies and that our development strategy seeks to support the delivery of strategic and local transport improvements.
Newport's heritage also needs greater consideration within the plan. Newport has an unrivalled heritage offer. There needs to be consideration of the impact of making the city attractive to tourists. Caerleon has what are probably the best Roman remains in the UK. Cadw is undertaking a scoping exercise to develop the site which will potentially draw in tens of thousands of visitors each year. Traffic is already a major problem in Caerleon. A railway station will be essential. Another urgent need will be to identify land for parking outside the village centre.	The Growth options have been a high level in relation to their contribution to the emerging objectives of the plan, including:  "Historic Environment- To preserve, enhance and realise the value of Newport's heritage resources, through investment,

	<p>interpretation and maximisation of those opportunities provided by the distinctive historic environment and archaeological assets.”</p> <p>The issues of the historic environment will be considered in further detail as the plan progresses.</p>
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**GSO 022 - Glamorgan Gwent Archaeological Trust - 00063**

<b>Question / Response</b>	<b>Officer Response</b>
<p>You will be aware that we are retained by your Authority to give advice to you regarding archaeology and the historic environment, through our archaeological planning team and the heritage management team. Newport have adopted the Historic Environment Record which is curated by this Trust and holds data on the historic environment for south east Wales.</p> <p>The document acknowledges the existing policies within both national Welsh Government and local government relating to archaeology and the historic environment. The Growth Options have been assessed against the RLDP Objectives and these include the Historic Environment; the assessment is undertaken with reference to the Well-being goals as well as the key Planning Principles. However, this assessment appears not to have taken into account that some Historic Assets are Statutorily Protected, and have a National level of protection. These include Listed Buildings, Scheduled Monuments, Registered Parks and Gardens, and Registered Landscapes. To add to these, there are at least 2,169 sites, features and artefacts noted within Newport's boundary noted on the Historic Environment Record; the much larger proportion of known assets are not statutorily protected. The document states: High growth scenarios may result in pressure to increase density of development or locate it in areas which could negatively impact on the setting of historic assets/landscapes. However, it does not consider that there may be a physical impact on the historic assets and landscapes, or that the impacts would require mitigation.</p> <p>Likewise, the Spatial Options have been assessed using the same process, resulting in the result that the options May place undue pressure on the preservation of historic assets within the countryside due to the levels of growth required.</p> <p>The origins of Newport as a current city primarily lie in the Roman, Medieval and post-Medieval periods, relating to maritime transport and trading, military and defensive aspects of settlement and industry and transport as well as religious and secular buildings. These have contributed to the current form and layout of the city and its environs. The areas of the Wentlooge, Mendalgief and Caldicot Levels, which are a Registered Landscape, are an important part of the historic environment within Newport's boundaries, and continuing into adjacent Authorities.</p>	<p>Noted. The Growth and Spatial Options taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>



<p>As previously noted, current legislation and policy is supported by the TAN24: the Historic Environment and a series of best practice guidance on managing change in the historic environment. Awareness of the archaeological and built heritage resource ensures identification of opportunities to mitigate impact prior to or during development, and also potential for enhancement and protection by design. It is our opinion that the impact of Growth and Spatial Options will have both physical and setting impact on historic assets and areas, both with and without statutory protection. The understanding and management of the Historic Environment has additional beneficial factors and contributes more widely to the Well-being goals than listed in the document.</p> <p>Regarding the historic environment and climate change Climate Change/Cadw (gov.wales) has details which provide further information for proactive working, and the Welsh Archaeological Trusts have been undertaking Cadw funded projects to identify and monitor change. Proposed changes (including proposed development and land management) affecting the historic environment can best be mitigated by early consultation with us as your Authority's archaeological advisors. Factors from a historic environment aspect which may cause risk are change from both physical and development means, on a large scale or as accumulative impact from smaller events.</p> <p>It is also important to recognise that Planning Policy Wales refers to historic assets, including buried archaeological remains and built heritage, being preserved in situ as a priority, and preserved by record if preservation in situ cannot be achieved.</p> <p>All archaeological work, including that undertaken to assess change in which may impact the historic environment, should be undertaken to the Standards and Guidance of the Chartered Institute for Archaeologists. It is our policy to recommend that all work is undertaken either by a Registered Organisation (RO) with the CIfA or by a MCIfA accredited member.</p>	
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**GSO 023 - B&K Futures & Bron Afon - 00647**

<b>Question / Response</b>	<b>Officer Response</b>
<p>We make representations on behalf of our client, B&amp;K Futures in response to the Newport Replacement Local Development Plan (RLDP) Growth and Spatial Options consultation paper. Our client has an interest in land at Marshfield Road, Castleton, which has been submitted as a Candidate Site. The land offers a logical development opportunity to deliver approximately 30 dwellings, including affordable homes, in a highly suitable and sustainability location contained within the existing built form of Castleton and within close proximity of Marshfield Primary School, Castleton Pre-School and Castleton and District Village Hall. Our client is an experienced developer and has good working relationships with Affordable Housing providers including Bronafon Housing Association.</p>	<p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation stage.</p>

<p>Our client’s response to the Growth and Spatial Options is set out below. In summary we consider that in line with national policy objectives and Newport’s strategic role as an area of growth in south east Wales, a higher number of homes should be sought through the RLDP including non strategic greenfield sites in sustainable locations, such as our client’s land, that can be delivered quickly.</p> <p>Our client would be willing to discuss the development opportunity further along with a programme for delivery.</p>	
<p><b>GROWTH OPTIONS:</b>  <b>Growth Scenarios -</b>  <b>1. Are there any scenarios that have been discounted which should be considered further, and why?</b></p>	
<p>We consider that it is entirely appropriate to discount the low growth options. In this regard, Policy 33 of Future Wales states that the Welsh Government support an “increased strategic role” for Newport which suggests that the continuation of the status quo i.e. existing levels of growth would also not be appropriate. Accordingly, enhanced levels of growth beyond the current LDP strategy are required.</p> <p>Table 1 provides a useful point of reference for establishing how an increased strategic role may be facilitated. Clearly in order to comply with Future Wales the Plan requires a level of growth that is at the very least equal to or greater than the current LDP level of growth, as such it cannot be justified removing the PG Short Term level of growth. Whilst they are very similar, this along with the Dwelling Led 5yr level are the only two approaches that would seek a higher level of growth than is presently the case and therefore comply with Future Wales, all of the others would imply a reduced strategic role.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><b>2. Which of the options do you feel is the most appropriate, and why?</b></p>	
<p>It is clear that the only two options that are appropriate, in line with Future Wales and an increased Strategic Role for Newport are those that are higher than the existing LDP level and in this regard we strongly believe that the Dwelling Led 5yr level is the most appropriate. It is clear that Future Wales anticipates Newport growing with an increased strategic role for the city. As such it is key that an aspirational level of growth is sought that seeks to drive the increase the strategic role that Newport plays and drive the regional economy.</p> <p>There are numerous factors providing the context for the level of growth sought which we believe point towards the higher levels. We set these out summarily below but note their importance in a higher growth requirement.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><u>Post Covid 19 recovery, energy crisis and Brexit</u>  It is clear that Newport faces significant challenges in order to achieve an increased strategic role in the context of the post Covid economy, Brexit Recovery and the ongoing energy crisis. We are strongly of the view that the planning process must play its part in helping to facilitate the economic recovery that is</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

<p>needed. Plainly economic recovery must form an over-riding requirement of the plan and without question must underlie the approach to be taken. An appropriate response to achieve an increased strategic role would be to plan for higher levels of growth than over recent plan periods.</p>	
<p><u>Constraints in adjoining Authorities</u>  In addition to meeting its own needs the Council will need to consider the lack of housing supply in neighbouring Authorities. Future Wales is also clear that “Growth at Newport will help manage the development pressures in the region by providing a strategic growth focus for the eastern part of the area”. Newport has not just been dealing with its own needs in recent years and accordingly needs to consider the offsets from new homes not being provided in its neighbouring authorities. Whilst housing land supply requirements were formally abandoned by the Welsh Government, it does not change the record of poor delivery elsewhere and it follows logically that where needs aren’t met within an Authority, they will need to be accommodated somewhere. Whilst this is an unsatisfactory and unsustainable position there is unlikely to be any change in this in the short term. Notably:</p> <ul style="list-style-type: none"> <li>- Torfaen &amp; Caerphilly – as of April 2021 there was a cumulative shortfall across the two Authorities of over 4,000 dwellings from the levels envisaged within their respective Local Development Plans. This represents the number of households that could not be provided in those respective Authorities. This is a shortfall of national significance that has a profound effect on house prices across the region; and</li> <li>- Monmouthshire – representations made by the Welsh Government on the Monmouthshire LDP mean fewer new housing allocations as it is not an identified area of growth. Given the additional constraints in Monmouthshire, including Phosphates, it is likely that demand will be displaced from Monmouthshire to adjoining Authorities.</li> </ul> <p>Therefore policy and supply constraints in adjoining Authorities will have a significant impact upon Newport Council in respect of the housing market and affordability issues. This is a challenge that the LDP respond to with higher growth rates than previous years in order to achieve an increased strategic role.</p>	<p>Noted. NCC is supportive of cross council working and joint working and effectively tackling cross boundary issues.</p> <p>The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><u>Meeting needs</u>  It will be of utmost importance to ensure Newport establishes a level of growth that meets needs and does not exacerbate the existing supply constraints in South Wales, taking into consideration the shortfalls in adjoining Authorities alongside Newport’s own needs. Rather we are of the view that the 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. In this regard it is noted that:</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

<ul style="list-style-type: none"> <li>• given the potential impacts of Covid 19 on the economy and society, there will be a need to adopt a highly ambitious strategy which provides far greater flexibility to respond to the crisis through added stimulation of the construction sector;</li> <li>• account should be taken in the baseline figures of the levels of sustainability and selfcontainment that can be achieved through embracing working from home trends for those sectors where it is feasible. These are often the high added value jobs that are no longer tied to cities such as Bristol or Cardiff but can retain expenditure in the local area and encourage vibrant local areas; and</li> <li>• any requirement should ensure an appropriate level of flexibility for delivery indeed, it may be that a 20% flexibility allowance or greater provides an appropriate starting point. We will comment on this further when detailed information becomes available.</li> </ul>	
<p><u>Addressing affordability</u></p> <p>The Council's result in nearly achieving its affordable housing target for 2015-2020 is to be welcomed. However, the Council recognise that this is only a small proportion of the actual level of need. The latest Local Housing Market Assessment (LHMA) indicates that "as of the 31st March 2017 there were 6,838 households with active applications on the housing waiting list. In order to clear this backlog during the 5 year life of this LHMA we would need to allocate 1,368 units of accommodation each year". The final stated annual shortfall is 559 per annum which equates to 2,795 over the five year period. This is plainly a significant issue within the Authority which has no doubt been exacerbated by price increases that have been caused due to shortages of housing supply outside of the County.</p> <p>Our clients are of the view that the replacement LDP provides an opportunity to seek to address affordability in a meaningful and substantive way.</p>	Noted
<p><b>3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</b></p>	
<p>We have considered the assessment of each of the options and have commented where we believe that the assessment could be reviewed. Importantly, with regards to the lower growth options that are considered (options 2 to 6) in the first instance, we do not believe that these will contribute towards the Future Wales aim for Newport to have an increased Strategic Role in South Wales, this should form part of the assessment.</p>	Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.
<p><u>Option 1: 12,570 new homes and 12,945 jobs</u></p> <p>With regards to the higher growth option we have suggested that a number of the "colours" should be improved based on the potential for positive outcomes. Indeed, greater levels of investment in line with an Increased Strategic Role for Newport would have the potential to bring many significant benefits across the assessment areas. We are strongly of the view that this is the only option that would allow Newport to strive towards an increased Strategic Role in line with Future Wales.</p> <p>Our analysis is below.</p>	This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.

Economy & Employment	We support the overall conclusions of this assessment
Population & Communities	We support the overall conclusions of this assessment
Health & Well Being	We support the overall conclusions of this assessment
Equality, Diversity and Inclusion	We support the overall conclusions of this assessment
Transport & Movement	<p>Newport has been identified as a location for growth within Future Wales specifically because it is a sustainable location for growth. Its communities are well connected to public transport and well served by facilities. With specific reference to Castleton, it benefits from bus services between Newport and Cardiff in both directions along the A48. There are also cycle links and both city edges of Newport and Cardiff are within a 20 minute cycle distance. Major employment areas are able to be reached within this 20 minute cycle range.</p> <p>We note that it is indicated that more opportunities for investment could be apparent under high scenarios, we believe that the Council's assessment should be more positive on this – indeed, higher levels of growth would enable a step change in investment and enhancement that could be a significant benefit. This should be re-assessed as green. Indeed, this is far more likely to be the case than for small scale, incremental and piecemeal infill development and ad-hoc brownfield sites.</p>
Natural Resources	<p>We are surprised by the comments set out herein, it is noted that water consumption would increase for all options however, there are sustainable means of managing this.</p> <p>Much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts.</p> <p>We also support the notion that greater investment brings the potential for more sustainable lifestyles, as greater facilities would exist and as construction techniques evolve and progress.</p> <p>We are strongly of the view that with appropriate planning interventions, this could be at least an orange category if not green.</p>
Biodiversity and Geodiversity	Again the categorisation red seems inappropriate (Option 5 and 6 are green) yet brownfield sites have equal (if not greater) chance of disturbing habitats and actually being unable to adequately mitigate.

	There is significant opportunity to provide ecological enhancement and net gain from greenfield sites.	
Historic Environment	We would note that each case would need to be dealt with based on its own merits, albeit there are more heritage assets (including Listed Buildings and Conservation Areas) within the urban area than there are in surrounding green fields.	
Landscape	As noted earlier much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts.	
Climate change	With regards to Flooding, there are considerable issues for existing properties in Newport, growth means higher investment and the potential to contribute towards solving existing problems. Increased investment in local facilities would mean potentially increasing sustainability. A higher growth strategy will actively prevent growth being dispersed. Indeed, low growth means that people would “jump” the green belt – leading to greater in commuting or travel to Bristol and Cardiff	
<p>With regards to the remaining options, we note:  <u>Option 2: 9,450 new homes and 10,695 Jobs &amp; Option 3: 9,570 new homes and 8,640 jobs</u>  Given the similar scale of growth we consider both options in the following table in order to minimise duplication. It is noted in the first instance that these would be contrary to the Future Wales aspiration for Newport to achieve an increased strategic role.</p>		<p>This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.</p>
Economy & Employment	We support the overall conclusions of this assessment	
Population & Communities	We support the overall conclusions of this assessment	
Health & Well Being	We support the overall conclusions of this assessment	
Equality, Diversity and Inclusion	We support the overall conclusions of this assessment	
Transport & Movement	We support the overall conclusions of this assessment for both options.	
Natural Resources	As with option 1, we are surprised by the comments set out herein, it is noted that water consumption would increase for all options however, there are sustainable means of managing this. In addition, much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban not at risk of flooding) is heavily influenced by negative urban impacts.	

	<p>We also support the notion that greater investment brings the potential for more sustainable lifestyles, as greater facilities would exist and as construction techniques evolve and progress.</p> <p>We are strongly of the view that with appropriate planning interventions, this could be at least an orange category if not green.</p>	
Biodiversity and Geodiversity	<p>Again the categorisation seems inappropriate (Option 5 and 6 are green) yet brownfield sites have equal (if not greater) chance of disturbing habitats and actually being unable to adequately mitigate.</p> <p>There is significant opportunity to provide ecological enhancement and net gain from greenfield sites.</p>	
Historic Environment	<p>It is unclear why options 2 and 3 are scored differently</p> <p>We would note that each case would need to be dealt with based on its own merits, albeit there are more heritage assets (including Listed Buildings and Conservation Areas) within the urban area than there are in surrounding greenfield.</p>	
Landscape	<p>We support the overall conclusions of this assessment</p>	
Climate change	<p>With regards to flooding, there are considerable issues for existing properties in Newport, growth means higher investment and the Increased investment in local facilities would mean potentially potential to contribute towards solving existing problems increasing sustainability.</p> <p>A higher growth strategy will actively prevent growth being dispersed.</p> <p>Indeed, low growth means that people would “jump” the green belt – leading to greater in commuting or travel to Bristol and Cardiff.</p>	
<p><u>Option 4: 7,950 new homes and 9,405 Jobs, Option 5: 8,100 new homes and 6,720 jobs &amp; Option 6: 7,605 new homes and 5,835 jobs</u></p> <p>Given that Options 4, 5 and 6 and low growth options with broadly similar levels of new homes, we set out our combined comments on these options below in order to avoid duplication. It is noted in the first instance that these would be contrary to the Future Wales aspiration for Newport to achieve an increased strategic role</p>		<p>This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.</p>
Economy & Employment	<p>We are of the view that these low growth options should all be categorised as red as they would not provide the combination of jobs and homes required to provide an increased strategic role for Newport</p>	
Population & Communities	<p>We are of the view that these low growth options should all be categorised as red as they would not provide the combination of jobs and homes required to provide an increased strategic role for Newport</p>	

Health & Well Being	At the lower scales of growth these options are unlikely to provide the investment required in such facilities rather it would be a continuation of existing levels.	
Equality, Diversity and Inclusion	We support the overall conclusions of this assessment however, question whether this should be red given the importance of meeting needs.	
Transport & Movement	With each option there would be fewer opportunities for significant levels of investment in improved infrastructure or sustainable means of travel.	
Natural Resources	It is clear that lower growth levels would require less greenfield land which would clearly result in a continuation of the existing urban / rural interface. However, there are areas that could benefit from new landscaping / planting to soften the interface and provide visual benefits in this regard.	
Biodiversity and Geodiversity	The categorisation seems in appropriate and it is unclear why options 5 and 6 are green yet brownfield sites have equal (if not greater) chance of disturbing habitats and actually being unable to adequately mitigate due to more limited land availability on site. They do not have the same level of opportunity to provide ecological enhancement and net gain as greenfield sites.	
Historic Environment	We would note that each case would need to be dealt with based on its own merits, albeit there are more heritage assets (including Listed Buildings and Conservation Areas) within the urban area than there are in surrounding greenfield.	
Landscape	It is clear that lower growth levels would require less greenfield land which would clearly result in a continuation of the existing urban / rural interface. However, there are areas that could benefit from new landscaping / planting to soften the interface and provide visual benefits in this regard.	
Climate change	With regards to Flooding, there are considerable issues for existing properties in Newport, growth means higher investment and the potential to contribute towards solving existing problems. There would potentially be less investment in sustainability. Lower growth is likely to contribute towards increased commuting whereby people would be priced out of the local market and “jump” the greenbelt to alternative locations where homes are available.	



<b>EMPLOYMENT LAND OPTIONS:</b>	
<b>Recommendation One -</b>	
<b>4. Is this requirement appropriate for Newport?</b>	
We are supportive of the recommendations of the Employment Land Review which seek to protect 157.8 ha of supply in order to achieve the 77ha requirement. We believe that this approach provides flexibility to achieve the Future Wales approach towards increasing the Strategic Role of Newport.	Noted
<b>5. Should it be different and if so, why?</b>	
As noted above, we support the recommendations of the Employment Land Review.	Noted
<b>Recommendation Two -</b>	
<b>6. Should some sites be removed from the employment supply? Why?</b>	
The Employment Land Review recommends that all the sites listed in Table E1 of the Executive Summary are retained within the RLDP, this includes both the Solutia Site and Queensway Meadows, therefore it is unclear why their removal is being considered, further clarity over this would be required in order for us to consider further.  It is noted that if Newport is to achieve its increased Strategic Role, it is imperative that it is providing a balance of jobs and homes and a significant supply of deliverable land for both purposes is available.	Noted. The Employment Land Review (NB not executive summary) discusses this in more detail, including the recommendations regarding East of Queensway Meadows at section 8.8.
<b>7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.</b>	
Given our response to question 6, we have no further comments on this question.	Noted
<b>SPATIAL OPTIONS:</b>	
<b>8. Which of these options do you feel is the most appropriate, and why?</b>	
We consider that in order to deliver the level of growth required, the Urban Expansion option provides an important focus. That said, a Hybrid of options should be taken forward as for instance an element of Village Focus will be key as it will be important for each community to be able to cater for its own needs and support its community facilities, such as schools, through a proportionate amount of growth. This will ensure a sustainable future for those settlements, including Castleton.	Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.
<b>9. Are there any other spatial distribution options that should be considered, and if so, why?</b>	
A hybrid combination of options will be required in order to achieve the growth required. We do not necessarily suggest an alternative option that has not already been considered, however, what will be important before formulating a preferred option is understanding the deliverability of candidate sites put forward. Smaller greenfield sites, such as our client's land, will provide the benefit of being able to be delivered early in the plan period without the requirement for significant new infrastructure.	Noted.  Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.
<b>10. Are there any other matters that should be given consideration when assessing these?</b>	

<p>In supporting our assessment of both the highest growth option and spatial approach which requires greenfield land, we set out below a number of key considerations in the benefits that they can bring. In particular in helping Newport to achieve and increased strategic role but also in terms of the other key assessment areas.</p>	<p>Noted</p>
<p><u>Sustainable urban extensions</u></p> <p>Our clients are of the view that it will be important to consider all scales of potential development from minor rounding off of settlements and infill to sustainable urban extensions in line with Future Wales. Indeed, the Welsh Government’s guidance, “Building Better Places” actively seeks to achieve rounded communities based on the underlying principles of place making.</p> <p>The Town and Country Planning Association (TCPA) indicates that the full range of planning solutions should be available to communities in order to achieve “the most sustainable pattern of development locally”. Guidance set out by the TCPA indicates that holistically planned urban extensions can enhance the natural environment and offer high-quality affordable housing and locally accessible work in beautiful, healthy and sociable communities. Such interventions could be exemplars in sustainability and energy efficiency.</p> <p>The TCPA also note that “Major planned developments such as ....urban extensions provide an opportunity to design-in the greenest of technologies and infrastructure from scratch, in ways that are not possible in smaller infill schemes”. Such schemes can set a benchmark in quality and approach that can lead the way for smaller schemes elsewhere in the country.</p> <p>Appropriately sized and scaled urban extensions provide the opportunity for new development to positively address existing issues by creating a planned environment to suit and cater for a critical mass of population, services and facilities. These can:</p> <ul style="list-style-type: none"> <li>• include a variety of housing types, tenures and densities along with neighbourhood centres with mixed uses and a range of facilities;</li> <li>• provide a landscape structure that builds on existing assets, including green infrastructure within the development, linking urban areas to the countryside beyond and creating a distinctive edge to the urban area;</li> <li>• provide opportunities for people to work locally and for small businesses to set up, grow and thrive;</li> <li>• present an opportunity to design energy efficient communities;</li> <li>• allow pedestrian, cycle and public transport networks to be fully integrated, often improving services available to the adjacent communities, increasing health and well-being by reducing the reliance on cars;</li> </ul> <p>and</p> <ul style="list-style-type: none"> <li>• support the surrounding communities by offering facilities not available locally and by providing affordable housing for people in the care and support sectors they can ensure that the elderly can continue to live independently amongst friends and family reducing the costs of providing social and nursing care.</li> </ul>	<p>Noted</p> <p>Noted. The Deposit Plan will include reviewed urban and village boundaries and green wedge designations.</p>

<p>These concepts are best delivered through consideration of longer term time horizons and wider geographical areas so that the benefits of strategic solutions are explored. The alternative of short term, small scale, incremental and dispersed change will not yield the same overall benefits. Importantly, by applying a coherent and distinctive urban design concept and master planned approach that combines innovative solutions and reflection of local characteristics, such extensions can provide the opportunity to create a new development that has a strong local identity. This will facilitate effective integration with the existing community for whom there should be major benefits particularly in relation to supporting the existing economy and creating jobs but also in the provision of a range of housing sizes, styles and tenures to accommodate those currently priced out of the local housing market. This accords with a wide range of national planning policy requirements.</p>	
<p><u>Sustainable growth locations</u> It is inevitably the case that the supply of brownfield sites in Newport for redevelopment for residential purposes is limited. As such, the Council will need to consider sustainable and appropriate greenfield locations based around existing communities. In reality, this is likely to focus on the western and north western parts of the County extents associated with existing built form and communities. Indeed, we are of the view that the LDP must not neglect the requirements of these existing communities in favour of more remote areas on the Eastern side of the city that would be more aligned to commuting patterns along the M4. It is anticipated that such focal points for proportionate growth include a number of existing communities where there are a number of local facilities that can provide an opportunity to maximise levels of self-containment and sustainability. Indeed, proportionate growth can help to reinforce existing levels of sustainability but also seek to provide additional facilities and uses that can move to a greater level of neighbourhood and community well-being. In this regard, our clients consider that Bettws and Rogerstone are suitable locations to accommodate further sustainable growth.</p>	<p>Noted. The deposit plan will include reviewed urban and village boundaries.</p>
<p><u>Castleton</u> Castleton is a very sustainable local settlement located partway between the Cities of Newport and Cardiff. It provides a range of existing facilities and is considered to be highly appropriate for proportionate small scale extensions and infill development in order to help provide affordable homes. Indeed, there is considered to be a significant need for more affordable properties to help ensure a more balanced community. It is notable there is a wide range of local services and facilities that would ensure it is a suitable location for additional provision of homes:</p> <ul style="list-style-type: none"> <li>• Castleton and District Village Hall</li> <li>• Marshfield Primary School</li> <li>• Castleton Baptist Church Fellowship</li> <li>• Petrol Station</li> </ul>	<p>Noted. The Deposit Plan will include reviewed urban and village boundaries and green wedge designations. A village appraisal is provided in the Settlement Assessment Background Paper.</p>

<ul style="list-style-type: none"> <li>• Convenience Store</li> <li>• Motor Vehicle Garage</li> <li>• Premier Inn Hotel</li> <li>• Coach and Horses Restaurant and Pub</li> </ul> <p>Furthermore, it is located along sustainable public transport routes with bus stops run along Marshfield Road. These stops serve bus route 30, which operates between Cardiff and Newport via Old St Mellons, Castleton and Tredegar Park. This provides 28 services per day between Monday and Friday, 26 services on Saturdays and 10 services on Sundays.</p> <p>Summarily, it is clear that at the local scale a general level of self containment and walking can be achieved and more strategically it is well placed in respect of public transport routes. Small scale expansion with proportionate affordable homes that do not impact upon landscape constraints (in particular coalescence with Cardiff) should be explored and encouraged.</p>	
<p><b>EVIDENCE BASE:</b></p>	
<p><b>11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</b></p>	
<p>It is noted that only limited evidence is currently available and it is clear that there will be a need to publish significantly more evidence in respect of matters such as supply of housing land.</p>	<p>Noted</p>
<p><b>12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</b></p>	
<p>In general terms we are supportive of the overall approach towards the objectives, however, we believe that particular attention is needed with regards to economic and population / community objectives. As we have stated earlier, there are significant challenges ahead and it must be the role of the planning process to help address these issues rather than constrain recovery and realignment.</p> <p>We are strongly of the view that well planned urban extensions can contribute towards a range of the key objectives not just in respect of population and communities, inclusive of:</p> <ul style="list-style-type: none"> <li>• including a variety of housing types, tenures and densities along with neighbourhood centres with mixed uses and a range of facilities;</li> <li>• providing a landscape structure that builds on existing assets, including green infrastructure within the development, linking urban areas to the countryside beyond and creating a distinctive edge to the urban area;</li> <li>• providing opportunities for people to work locally and for small businesses to set up, grow and thrive;</li> <li>• presenting an opportunity to design energy efficient communities;</li> <li>• allowing pedestrian, cycle and public transport networks to be fully integrated, often improving services available to the adjacent communities, increasing health and well-being by reducing the reliance on cars; and</li> </ul>	<p>Noted. The Deposit Plan will include reviewed urban and village boundaries and green wedge designations.</p>

<ul style="list-style-type: none"> <li>• supporting the surrounding communities by offering facilities not available locally and by providing affordable housing for people in the care and support sectors they can ensure that the elderly can continue to live independently amongst friends and family reducing the costs of providing social and nursing care.</li> </ul>	
<p><b>Other comments</b></p> <p>Our client has development experience and working relationships with affordable housing providers, including Bronafon Housing Association. Our client would welcome engagement with the Council to discuss the opportunity in Castleton in further detail and the role the site can play in the delivery of sustainable development through the replacement LDP.</p>	Noted

**GSO 024 - Barratt David Wilson Homes (Bettws Hill - 00173**

Question / Response	Officer Response
<p><b>Growth Options - part 1</b></p> <p><b>Growth Scenarios</b></p> <ol style="list-style-type: none"> <li><b>1. Are there any scenarios that have been discounted which should be considered further, and why,</b></li> <li><b>2. Which of the options do you feel is the most appropriate, and why, Assessment of Growth Options Against RLDP Objectives</b></li> <li><b>3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy,</b></li> </ol>	
<p><u>Background</u></p> <p>Chapter 3 of the Growth and Spatial Options Document presents and seeks feedback on a series of growth scenarios which would in turn inform the housing requirement and the number of jobs to be planned for (which in turn would derive the employment land requirement). Initially, 12 scenarios are presented in Table 1 with Table 2 further refining this down to six Growth Options as the employment-led scenarios and those scenarios that would result in low levels of growth have been removed.</p> <p>As part of the Call for Sites in August and September 2021, Barratt David Wilson Homes submitted the site known as 'Land at Bettws Hill' (CS0045). The submission was comprehensive and included an extensive package of documentation aimed at demonstrating environmental and technical acceptability and performance.</p> <p>Given Barratt David Wilson Homes interest within Newport, the Growth Strategy is only relevant in so much as it informs the housing requirement with matters relating to the number of jobs to be planned (and associated employment land requirement) not of relevance.</p> <p><u>Context</u></p> <p>National planning policy is clear as to how a housing requirement should be formulated with Paragraph 4.2.6 of Planning Policy Wales Edition 11 (February 2021) stating that:</p> <p>'The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a</p>	<p>Noted. Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>

<p>fundamental part of the evidence base for development plans. These should be considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also be given to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities.'</p> <p>From the above text it is clear that-</p> <ol style="list-style-type: none"> <li>1. Household projections should be used as the starting point for establishing the housing requirement; but that</li> <li>2. Other elements of the evidence base should also underpin the housing requirement; and that also</li> <li>3. The wider political, economic, social, and environmental context, combined with what the Local Planning authority (LPA) want the Replacement Local Development Plan (RLDP) to achieve, should be considered.</li> </ol>	
<p><u>Point 1 - Household Projections</u></p> <p>Barratt David Wilson Homes suggest that the correct projection to use is the WG-2018- HIGHPOP (Growth Option 2). The reason for this is that, unlike the WG-2018-Principal or the WG-2018-LOWPOP projections, it is re-based to the 2021 Census.</p> <p>This is the right starting point because it makes use of the most recent set of household projections (2018-based) whilst responding to the actual findings of the 2021 Census which provide an incredibly accurate snapshot in time that is more recent than the 2018-based projections. Put another way, it reflects the actual position on the ground, and the projections associated with it, at a fixed point in time rather than a wholly projected scenario.</p> <p>This is particularly important in the case of Newport City Council (NCC) where there is a significant under estimation of the position compared to the actual findings of the 2021 Census. This is articulated in the 'LDP Demographics' Paper prepared by Edge Analytics on behalf of Newport City Council which at Paragraph 2.25 states that-</p> <p>'Newport has seen the largest population increase between the 2020 MYE and 2021 Census population compared to other Welsh authorities (2.0%) (Figure 20). Only two out of the 22 Welsh authorities have seen an increase between the two population figures (Powys and Newport), with the rest of the authorities showing population declines.'</p> <p>Taking the above together, it would be the right approach for LPAs, in general, to use the WG-2018- HIGHPOP going forward and this is particularly important for an LPA such as NCC where there is a significant diversion between the 2018-based projections and the 2021 Census.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

## Point 2 - Evidence Base Elements

Two of the options presented in Table 2 of the Growth and Spatial Options Document are the PG-Short Term and PG-Long Term scenarios (the PG-Long Term is also presented as a Growth Option in Table 2). These scenarios use the ONS 2020 Mid-Year Estimate and then calibrate either to assume migration rates over the last five years (in the case of the PG-Short Term) or 19 years (PG-Long Term).

The below table has been put together using the ONS' 'Local Area Migration Indicators' dataset from September 2021 and shows the net balance of inflow and outflow over the last ten years to and from Newport from other parts of the UK. In this case, it is calculated by subtracting the number of people that leave NCC to move to another local authority from the number of people that move to NCC from another local authority:

Year, Net Internal Inflow

2010-2011 90,

2011-2012 -197,

2012-2013 -357,

2013-2014 -485,

2014-2015 -11,

2015-2016 271,

2016-2017 1098,

2017-2018 1211,

2018-2019 445,

2019-2020 1118

The table shows a changing balance over the last 10 years, from a period where there was a net outflow of people from Newport to a situation since 2015-2016 where there has been a sustained and significant net inflow of people from Newport. Assuming a household size of 2.3 people, the net inflow would represent an additional 486 homes per annum for 2019/2020. The 2018/2019 figure is an anomaly as a result of COVID19 - something that is recognised in Paragraph 2.15 of the "LDP Demographics" Paper.

The 'LDP Demographics' Paper prepared by Edge Analytics explains why it is the case that there has been a net inflow since 2015/2016 at Paragraph 2.14 which states that:

"Likely factors driving this increase include the rate at which new homes have been built, the removal of the Severn Bridge toll in 2018 and the introduction of ONS' Higher Education Leavers Methodology (HELM)."

The fact that this the greatest net inflow is from Bristol, North Somerset, and South Gloucestershire (Figures 14 and 15 of the LDP Demographics Paper) helps to confirm this conclusion. The position with regards to the Severn Bridge tolls is fixed - the tolls have been removed and there is no indication of them being re-introduced. There is therefore no structural reason as to why the net inflow of people would reverse in coming years.

Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers. To be passed to Edge for further consideration.

<p>Policy 33 (National Growth Area - Cardiff, Newport, and The Valleys) recognises the importance of a collaborative approach with neighbouring authorities, stating that:  'The Welsh Government will work with authorities within the region and in England to promote Newport's strategic role and ensure key investment decisions in Wales and England support Newport'</p> <p>Barratt David Wilson Homes do not suggest it would be the right approach for either of the PG scenarios to be chosen as a Growth Option as ultimately they look at previous trends rather than future projections to come over the RLDP plan period, but it is clear that the level of UK based migration is such that a significant uplift on the selected demographic scenario should be applied and that this should be based on a PG option that considers the level of net internal migration over the last four years since the tolls have been removed (excluding the year effected by the COVID19 pandemic) rather than a longer time window. This should be applied as a "multiplier" on top of Growth Option 2.</p>	
<p><u>Point 3 – Wider Political, Economic, Social, and Environmental Context</u></p> <p>The main document that sets out how Newport should be seen in the context of the wider South East Wales region is Future Wales: The National Plan 2040. The status of Future Wales is set out in Section 2.1 of the Growth and Spatial Options document – it is a development plan document and, by virtue of its status, the Replacement LDP must be in conformity with it.</p> <p>There's no need to repeat exactly what is said in either document but the wording of from Policy 33 (National Growth Areas – Cardiff, Newport, and The Valleys) is clear:  "The Welsh Government supports an increased strategic role for Newport as a focus for sustainable, long-term growth and investment."  This is built upon in the Policy's subtext which, in the first paragraph on Page 165, states that:  "The Welsh Government is determined to see development and growth in Newport, allowing the city to fulfil its potential as a second focal point for the region."  A reading of the remainder of the policy wording and its supporting subtext effectively states that this should be achieved by Newport:</p> <ul style="list-style-type: none"> <li>• Having an increased strategic role for sustainable long term growth,</li> <li>• Being a growth pole for new housing in the eastern part of South East Wales; and</li> <li>• Working alongside neighbouring authorities (both in South East Wales and England) to achieve this.</li> </ul> <p>The implications of this are that any Growth Option selected must be aspirational and this is recognised in Section 3.1 of the Growth and Spatial Options document which, on Page 12, explains that a number of the options suggested in Table 1 have been dismissed due to their low scale of growth not being in conformity with Future Wales.</p> <p>The status of Newport in Future Wales is such that there is further justification for the selection of Growth Option 2 as a starting point given that it is aspirational in nature whilst the encouragement to work with neighbouring local authorities suggests that net inflow into Newport from neighbouring authorities should be welcomed and planned for through the incorporation of a PG scenario.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>



<p><u>Assessment of Growth Options Against RLDP Objectives</u></p> <p>Appendix A of the Growth and Spatial Options Document provides an appraisal of the performance of the six Growth Options against the 10 RLDP Objectives, in essence allowing to create a matrix that allows for comparison between the various options. This is built upon further in Appendix A of the Document. Barratt David Wilson Homes' concern is that the assessment undertaken as part of Table 3 and in Appendix A assumes that a certain Growth Option will have an "Amber" or even "Red" impact when the selection of appropriate sites which are environmentally and technically acceptable (or incorporate appropriate mitigation, compensation, and enhancement to achieve this) can mean that they can be delivered without a negative impact (i.e. with a "Green" or, at worst, "Amber" impact). In this sense, it is essential to stress that the comprehensive submission that Barratt David Wilson Homes made as part of the Call for Sites demonstrated that CS0045 – Land at Bettws Hill could be delivered in a way which is technically and environmentally sound such that the performance against many of these objectives could instead be considered to be "Green" in this context.</p>	<p>Noted. This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.</p> <p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>																
<p><u>Extent of Flexibility Allowance</u></p> <p>Paragraph 5.58 of Edition 3 the Development Plans Manual (March 2020) is clear that there is a requirement for a flexibility allowance to be added on top of the housing requirement to derive the number of homes than RLDP should plan for. This is in the interest of ensuring that sufficient housing is delivered when some allocated sites either are not delivered or deliver less home than anticipated. Paragraph 5.59 of Edition 3 the Development Plans Manual is clear that the extent of the flexibility allowance should be informed by local issues with 10% as a starting point (i.e. as the minimum). Barratt David Wilson Homes recognise that the extent of the flexibility allowance will be determined considerably later in the RLDP preparation stage, likely at Deposit stage and that it is inappropriate to comment too much on this at this time.</p> <p>That said, Indicator OB4 MT3 of the Annual Monitoring Report (October 2022) for the period from April 2021 to April 2022 recognised a cumulative shortfall in housing delivery against the LDP's housing trajectory. Historic performance against this indicator is presented in the table below:</p> <table border="1"> <thead> <tr> <th>Year</th> <th>% Delivery Against Cumulative Required Rates</th> </tr> </thead> <tbody> <tr> <td>2015</td> <td>-5%</td> </tr> <tr> <td>2016</td> <td>3%</td> </tr> <tr> <td>2017</td> <td>-2%</td> </tr> <tr> <td>2018</td> <td>-6%</td> </tr> <tr> <td>2019</td> <td>-9%</td> </tr> <tr> <td>2020</td> <td>-12%</td> </tr> <tr> <td>2021</td> <td>-14%</td> </tr> </tbody> </table> <p>Importantly, this is against the housing requirement of 10,350 homes and not the 11,623 homes that the adopted LDP plans for. In essence, in 2021 where the rate is a -14% rate, this is 14% below the housing</p>	Year	% Delivery Against Cumulative Required Rates	2015	-5%	2016	3%	2017	-2%	2018	-6%	2019	-9%	2020	-12%	2021	-14%	<p>Noted, the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers provide greater detail on this.</p>
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<p>requirement but 26% below the number of homes that were planned for which incorporated the 12% buffer in the adopted LDP.</p> <p>Even at this stage it is clear from the above that the 12% buffer in the adopted LDP is entirely inadequate and a greater buffer should be incorporated for the RLDP.</p> <p><u>Conclusion</u></p> <p>Taking the above together Barratt David Wilson Homes suggest that Growth Option 2 should be used as the starting point but should be enhanced to reflect the higher levels of net inflow into Newport in recent years and Newport’s significance to the South East Wales region in Future Wales. Whilst for consideration in subsequent consultations, a greater flexibility should be applied on top of the housing requirement than that in the adopted LDP.</p>	
<p><b>Spatial Options</b></p> <p><b>8. Which of these options do you feel is the most appropriate, and why?</b></p> <p><b>9. Are there any other spatial distributions that should considered, and if so, why?</b></p> <p><b>10. Are there any other matters that should be given consideration when assessing these?</b></p>	
<p><u>Background and Policy Context</u></p> <p>Chapter 4 of the Growth and Spatial Options Document presents four Spatial Options as to how the requirements outlined in Chapters 2 and 3 should be distributed spatially. Four options are presented - one which would be to focus new housing on previously developed land, a second which would be to focus on a series of greenfield allocations on the edge of the urban boundary, a third of directing growth to nine identified villages, and a fourth which is a hybrid of the previous three options.</p> <p>Paragraph 3.44 of Planning Policy Wales Edition 11 (February 2021) provides guidance as to how the site search sequence should be undertaken when identifying residential allocations, stating that:</p> <p>"Where there is a need for sites, but it has been clearly demonstrated that there is no previously developed land or underutilised sites (within the authority or neighbouring authorities), consideration should then be given to suitable and sustainable greenfield sites within or on the edge of settlements. The identification of sites in the open countryside, including new settlements, must only be considered in exceptional circumstances and subject to the considerations above and paragraph 3.50 below."</p> <p><u>Commentary on Reliance on Previously Developed Land Approach</u></p> <p>Whilst there is no doubt that the delivery of previously developed land (PDL) is prioritised in national planning policy, the Growth and Spatial Options Document recognises that there is not going to be sufficient previously developed land available for the continuation of the PDL-led approach taken in the adopted LDP. The first paragraph of Section 5 of Document is clear on this, stating that:</p> <p>"While the merits of continuing this strategy are understood, there is some concern that previously developed land is a finite resource and the availability of sites may not be as buoyant as it was or the reuse of land for housing may require the de- allocation of some employment sites."</p>	<p>Noted</p>

<p>On this basis, the selection of the PDL-led Spatial Option is not going to be sufficient to meet the higher Growth Options (and importantly the Growth and Spatial Options paper discounts the lower Growth Options).</p> <p>There is also a wider point as to whether reliance on a PDL-led strategy is a sufficiently robust Spatial Strategy to ensure that the housing requirement is delivered in full. The adopted LDP relies on a PDL-led strategy and, as set out in connection to the flexibility allowance for the Growth Options questions, this has resulted in a significant shortfall of housing delivery compared to the housing trajectory. Analysis from the Annual Monitoring Report (October 2022) for the period from April 2021 to April 2022 shows that there are 1,189 (equating to 11.5% of the total housing requirement) units that the adopted LDP anticipated to be delivered on brownfield sites in the adopted LDP plan period but now are not expected to be delivered prior to its end date in 2026.</p> <p>From the above, it is clear that there is not enough PDL land for the implementation of a PDL-led Spatial Strategy and that, even if there was, the implementation of a PDL-led approach would likely result in a shortfall in delivery against requirement. Barratt David Wilson Homes therefore suggest that:</p> <p>Any 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;</p> <ul style="list-style-type: none"> <li>o 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;</li> <li>o 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 available and viable.</li> </ul>	
<p><u>Suggested Approach</u></p> <p>The higher Growth Options (including the modified Option 2 that Barratt David Wilson Homes are suggesting) that are set out in the Growth and Spatial Options Document are unlikely to be able to be met in their entirety through either the "Village Focus" Spatial Option or the "Urban Expansion" option and therefore it is suggested that the "Hybrid" Spatial Option is really the only suitable Spatial Option that can deliver the higher Growth Options that are suggested and continue to perform strongly against the RLDP's objectives. As part of this, it is essential that the "Hybrid" Spatial Option directs new housing to the most appropriate locations which, for the reasons set out below, should include Bettws.</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p>Policy 34 (Green Belts in the South East) of Future Wales: The National Plan 2040 is deliberately vague in describing what the Green Belt should cover, instead stating only that it should be located to the north of Newport. In all of the Illustrative Diagrams that accompany the four Spatial Options, an "Assumed Area Under Consideration for New Green Belt" is shown wrapping around Bettws but not across other areas which could be considered to be north of Newport. It is understood that a piece of technical work has been commissioned by the Cardiff Capital Region and it is suggested that the current approach to identifying the extent of the Green Belt, and potentially excluding settlements and sites because of it, would be prejudicial. Notwithstanding this, it is considered that any Green Belt should go to the north of</p>	<p>Noted, the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers provide greater detail on this.</p>

Bettws and not wrap around it to the south. The below table assesses the southern edge of against the five Green Belt purposes as set out in Paragraph 3.67 of Planning Policy Wales Edition 11 (February 2021).

Green Belt Test-Assessment

<b>Green Belt Test</b>	<b>Assessment</b>
Prevent the coalescence of large towns and cities with other settlements –	There is a separation distance of some 1.5km from the southern edge of Bettws to the northern edge of Newport and, notwithstanding this, the M4 would prevent coalescence.
Manage urban form through controlled expansion of urban areas	There are opportunities to deliver new housing on the southern side of Bettws that would be well related to existing development such that it does not appear as an unnatural extension into the countryside. The suitability of such developments can be demonstrated through appropriate landscape and visual technical work.
Assist in safeguarding the countryside from encroachment	
Protect the setting of an urban area	Bettws contains no listed buildings, conservation areas, or Scheduled Ancient Monuments, nor is land on its southern edges subject to any landscape designations that would mean that it's setting is of particular significance.
Assist in urban regeneration by encouraging the recycling of derelict and other urban land	It is considered that the allocation of proportionate amounts of greenfield land adjoining Bettws could happen without prejudicing brownfield land coming forward as windfalls sites.

The southern side of Bettws is an entirely appropriate location for new housing:

- Given the suggestions in the table above, the southern side of Bettws should not be considered to be within the "Assumed Area Under Consideration for New Green Belt";
- It is largely free from fundamental constraints in that it is largely free from flood risk, is not washed over by, and is generally distant from, significant landscape, ecological and heritage designations (unlike land to the north of Bettws),
- As demonstrated in the Transport Assessment (prepared by Vectos) submitted as part of the Call for Sites, Bettws is a sustainable location which is well-connected to local bus routes and contains a mix of local services;
- It would add to the range and choice of housing supply locally in a context where the adopted LDP:
  - Did not make new housing allocations within Bettws, instead only creating a positive planning context for a single existing housing commitments which has now been fully delivered;

<ul style="list-style-type: none"> <li>○ By virtue of its previously developed land approach, delivered housing at high densities in urban areas; and</li> <li>○ Focuses much of the new housing growth towards southern and eastern parts of NCC Rather than in northern and western locations such as Bettws.</li> <li>● As demonstrated by Barratt David Wilson Homes' experience in the delivery of the Former Bettws Comprehensive site, Bettws is an attractive location such that there can be confidence of successful delivery.</li> </ul>	
<p><b>Conclusion</b> Barratt David Wilson Homes recognise the "Hybrid" Spatial Option to be the only approach that can realistically be relied upon to deliver the housing requirement. That said, the approach needs to focus growth in those locations where it is appropriate and, for the reasons above, it is suggested that Bettws is one of those.</p>	<p>The Deposit Plan will include a review of the urban and village boundaries. The Settlement Assessment Background Paper provides a village appraisal.</p>

**GSO 025 - Caerleon Civic Society - 00034**

Question / Response	Officer Response
<p><b>Growth options</b> <b>Growth Scenarios -</b></p> <ol style="list-style-type: none"> <li>1. <b>Are there any scenarios that have been discounted which should be considered further, and why?</b></li> <li>2. <b>Which of the options do you feel is the most appropriate, and why?</b></li> </ol> <p><b>Assessment of Growth Options Against RLDP Objectives -</b></p> <ol style="list-style-type: none"> <li>3. <b>Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</b></li> </ol>	
<ol style="list-style-type: none"> <li>1. No. Lower growth scenarios would not be in line with Welsh Government direction. Higher growth scenarios would be unsustainable and would place unmanageable pressures on infrastructure.</li> <li>2. Option 2 is most likely to achieve sustainable growth over the whole plan period and appears, at this stage of analysis, to imply most positive outcomes and least negative outcomes.</li> <li>3. There is some evidence tracked in the Annual Monitoring Reports (but not the latest one because of lack of data on multiple deprivation) that the previous plan period of high , housing led growth has been paralleled by a growing deprivation in Newport and a widening social and economic gap between the most deprived areas and the least deprived. Is this an unintended consequence of high housing growth and its location, tenure and affordability or the product of wider forces in the economy and society? Is the issue of social segregation and cohesion a matter for a Local Development Plan - if not, how can this issue be addressed and influenced by the City Council?</li> </ol>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><b>Employment Land Options</b> <b>Recommendation One -</b></p> <ol style="list-style-type: none"> <li>4. <b>Is this requirement appropriate for Newport?</b></li> </ol>	

<p>5. <b>Should it be different and if so, why? Recommendation Two -</b></p> <p>6. <b>Should some sites be removed from the employment supply? Why?</b></p> <p>7. <b>Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.</b></p>	
no comments	Noted
<p><b>Spatial options</b></p> <p>8. <b>Which of these options do you feel is the most appropriate, and why?</b></p> <p>9. <b>Are there any other spatial distributions that should be considered, and if so, why?</b></p> <p>10. <b>Are there any other matters that should be given consideration when assessing these?</b></p>	
<p>8. Probably the hybrid option. The Annual Monitoring Report for 2022 indicates that 93% of new homes have been delivered on PDL land. We do not feel that this level of PDL development can be sustained over the future plan period. Also local experience shows that the abnormal costs of developing some PDL land cannot accommodate the required level of Section 106 investment. Whatever spatial option is preferred, our local experience is that due weight must be given to the capacity of the local infrastructure to meet the needs of an increasing population and there should be an explicit assessment of the likelihood that the infrastructure will improve alongside housing growth - if this likelihood is low then well-being objectives will not be met</p> <p>9. A scattered growth option - smaller housing developments in many locations - would not meet the Objectives. A single 'new settlement' is worthy of consideration, depending upon its location, in order to meet a full range of Objectives in one place.</p> <p>10. The report states that '....land availability will need further consideration when determining the preferred spatial option.' The lack of information about land availability, including the list of candidate sites, crucially limits the ability of the general public to assess the options identified. It is accepted that such information will inevitably focus attention on local issues rather than strategic considerations. However it is difficult to assess the differences between the identified spatial options without some general information on land availability and the willingness of landowners and developers to bring it forward. In South Torfaen, the availability of full information about candidate sites has enabled a wide and informed debate about the strategic viability of large scale development in this area adjacent to Newport, as well as raising local implementation issues which are probably not relevant at this stage of plan-making.</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.</p> <p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>
<p><b>Evidence Base</b></p> <p>11. <b>Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</b></p> <p>12. <b>Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</b></p>	
<p>11. Is there any empirical evidence about where the people, who have moved to live in the new homes built in the last 10 years, are employed and how they currently travel to work? It is difficult to</p>	<p>The Demographic Evidence, Employment Land Review (NB not executive summary) detail what key economic factor have been considered.</p>

<p>assess the stated importance of reducing commuting and developing a more self-contained city if we don't know enough about the current base-line and how future housing-led growth will impact on it.</p>	
<p>12. We would support the introduction of a green belt to the north and west of Caerleon, and in other appropriate parts of the city. This provides an essential balance to further housing-led growth. It is vital that the green belt concept is also applied to areas adjacent to the Newport boundary with Caerphilly, Torfaen and Monmouthshire.</p> <p>It is accepted that the spatial options maps are indicative. However, there is strong local feeling that the proposal for a railway station in Caerleon, included in the previous plan, appears to have been dropped. We consider that this issue should remain open for public discussion on the basis of providing a further important travel option for the local community although we do not consider that the Future Wales statement, that development around new and improved metro stations should be high density and mixed use, is appropriate in the case of every new station, including Caerleon.</p>	<p>Noted</p> <p>The Newport Local Development Plan currently includes policy T1, which supports all proposals for new stations, including a station at Caerleon. The role of the Local Development Plan is to facilitate new and improved stations, but it does not directly allocate these or determine the location of new stations.</p> <p>As part of this process the LDP team will continue to work with partners, including Welsh Government and Transport for Wales, during the preparation of the replacement LDP to ensure any amendments to policy T1 reflect the opportunities identified by the appropriate transport strategies and that our development strategy seeks to support the delivery of strategic and local transport improvements.</p>

**GSO 026 - RPS Consulting Services Ltd - 00853**

Question / Response	Officer Response
<p><b>GROWTH OPTIONS:</b>  <b>Growth Scenarios -</b>  <b>1. Are there any scenarios that have been discounted which should be considered further, and why?</b>  <b>2. Which of the options do you feel is the most appropriate, and why?</b>  <b>Assessment of Growth Options Against RLDP Objectives -</b>  <b>3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</b></p>	
<p>1. There are no scenarios that have been discounted that should be considered further.  2. The higher housing growth scenarios published in the growth and spatial options paper accurately reflect that the RLDP has to conform with the Future Wales' spatial strategy. The RLDP should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure.  Option 1 (Dwelling-led SYR) is the most appropriate of the growth scenarios to fulfil Future Wales. The Welsh Government is determined to see development and growth in Newport, allowing the city to fulfil</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

<p>its potential as a second focal point for the region. Highly skilled employment opportunities in the transport and digital communications sectors should be catalysts for further economic investment. Option 1 proposes the highest amount of dwellings across the local authority. This is essential to enhance Newport's economic role. The Dwelling-led 5YR scenario has a higher but realistic population change than Option 2 WG-2018-HIGHPOP. This is the step change necessary to achieve the National Plan. Option 1 is the only option with housing supply above the current LDP strategy, therefore, reflecting Newport's focus for growth role established by the Future Wales National Plan 2040.</p> <p>3. Option 1 will overall bring a neutral contribution to the RLDP objectives; population and communities, health and wellbeing, equality, diversion and inclusion and transport and movement. The risk of not achieving a step change for the City and delivery of growth as envisaged in Future Wales should be a matter for consideration when assessing the scenarios. To de-risk the plan the Preferred Strategy should be based upon a robust assessment of the capacity to deliver Option 1. Delivery and viability should be embedded in the next stages of the candidate site process. An adequate flexibility allowance should be applied to de-risk the plan.</p> <p>The preferred strategy should be based on an objective assessment of the role and function of places within Newport in line with the search sequence and National Sustainable Placemaking Outcomes, as set out in Planning Policy Wales. Delivery against the objectives of the Wellbeing of Future Generations Act and the UN Sustainable Development Goals can provide further surety that the strategy will create inclusive, connected, adaptable and accessible communities that are cohesive and ensure Newport's potential is realised.</p>	
<p><b>EMPLOYMENT LAND OPTIONS:</b></p> <p><b>Recommendation One -</b></p> <p><b>4. Is this requirement appropriate for Newport?</b></p> <p><b>5. Should it be different and if so, why?</b></p> <p><b>Recommendation Two -</b></p> <p><b>6. Should some sites be removed from the employment supply? Why?</b></p> <p><b>7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.</b></p>	
<p>4. Recommendation 1 is the minimum requirement to fulfil the expectations of Future Wales for Newport to be the focus for strategic economic growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure.</p> <p>5. Yes, it should probably be different. If the supply to match the requirement is to include the sites identified in the ELR, the requirement should be higher.</p> <p>Given the need to fulfil the local and sub regional (CCR) employment sites, other than those that have little to no prospect of being deliverable in the Plan Period, sites should not be removed from the employment land supply.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>



<p>6. TAN 23: Economic Development and PPW state that an existing employment site should only be released for other uses if other priorities, such as housing need overrides more narrowly focused economic considerations. The economic considerations are of national significance as per the growth strategy (Future Wales).</p> <p>7. No particular comment at this stage.</p>	
<p><b>SPATIAL OPTIONS:</b></p> <p><b>8. Which of these options do you feel is the most appropriate, and why?</b></p> <p><b>9. Are there any other spatial distributions that should be considered, and if so, why?</b></p> <p><b>10. Are there any other matters that should be given consideration when assessing these?</b></p>	
<p>8. With regard to spatial options, a hybrid approach is favoured with a mixture of previously developed land, sites on the edge of the urban boundary and sites at surrounding existing villages. Where there is a need for sites and there is no previously developed land or underutilised sites, consideration should be given to suitable and sustainable greenfield sites within or on the edge of settlements. A balance of previously developed land, sites on the edge of the urban boundary and sites at surrounding existing villages will ensure a range of locations and size of sites. A range of sites derisks the delivery of the RLDP. The hybrid approach scores highly against the RLDP objectives for Economy and Employment, health and wellbeing and biodiversity and geodiversity.</p> <p>PPW is clear due to their strategic nature Green Belts will have significance beyond a single local authority and they should only be proposed as part of either a Joint LDP, an SDP or Future Wales. The green belt needs to be balanced with placemaking potential and achieving the growth strategy as per Future Wales. The national plan envisages strategic growth should be focused in and immediately adjoining Newport itself.</p> <p>9. The four spatial distributions provided cover the full range of options from urban to rural land use for development, with the addition of a mixture of both. Under the urban expansion scenario, it is clear that unconstrained and deliverable sites in the identified locations in the East of Newport (such as at Langstone) can play a clear role in supporting the hybrid scenario.</p> <p>10. The hybrid option scores favourably as per the assessment of spatial options. To de-risk the delivery of the plan as per the LDP Manual 3 a further matter for consideration is the delivery risk associated with each of the spatial options. The hybrid option is low risk and can help to deliver a balanced supply along with a balanced distribution, with sites on the East (such as at Langstone) having excellent linkages to the city centre and beyond and employment.</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.</p>
<p><b>EVIDENCE BASE:</b></p> <p><b>11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</b></p> <p><b>12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</b></p>	

<p>11. The current evidence base used to inform the development of the preferred growth and spatial options strategies is sufficient and critically encapsulates Newport as a growth area in National planning policy.</p> <p>12. It is important that the RLDP takes a pragmatic approach and provides a good balance between housing and employment growth opportunity. There needs to be a strong focus on those identified areas for growth in the paper. A good range of different house types and tenures in a range of locations should be supported through the RLDP, taking advantage of available land on the edge of Newport (such as at Langstone) to help deliver an appropriate scale of growth for the City.</p>	Noted
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**GSO 027 - St. Modwen Developments Limited – 00648**

Question / Response	Officer Response
<p>COMMENTS ON BEHALF OF ST. MODWEN LOGISTICS</p> <p>Savills is instructed by St. Modwen Logistics (“SML”) to make representations to the Newport Replacement Local Development Plan (“RLDP”) Growth and Spatial Options consultation. Comments are made in respect of both the Growth and Spatial Options paper (January 2023) and the Employment Land Review (February 2022) which accompanies it. Enclosed is a Comments Form, however, given the constraints of the form the substance of the comments is presented in this letter.</p> <p>As you will be aware, SML is promoting St. Modwen Park Newport, the employment area on the eastern side of the residential led mixed used regeneration of Glan Llyn which sits on the former Llanwern Steelworks site. This is one of the Newport’s (and South Wales’) key regeneration schemes and lies on a major gateway into South Wales. The site is previously developed (or brownfield) land and occupies a strategic and sustainable position. It is some 243 hectares in size (of which approximately 37 hectares is St. Modwen Park Newport) and basically free from environmental designations and constraints. It has, however, been severely affected by its’ heavy industrial past.</p> <p>To date, SML and an experienced project team have fostered strong working relationships with key stakeholders and officers at Newport City Council (“NCC” or “the Council”). All parties recognise St. Modwen Park Newport (and Glan Llyn, the residential led component) as a clear local and regional priority for regeneration. The significant progress made to date demonstrates that a mixture of uses is possible, and it is important that the site continues to feature as part of an allocated site in the RLDP. To ensure that it does, the entire site (Glan Llyn and St. Modwen Park Newport) was promoted as a Candidate Site in August 2021. The submission reinforced the sites’ potential for further redevelopment and recommended that St. Modwen Park Newport’s allocation within the Eastern Expansion Area (“EEA”) is maintained in the RLDP as a specific regeneration allocation.</p> <p>This letter has been prepared to provide some further explanation of St. Modwen Park Newport’s credentials and commentary on the Growth and Spatial Options presented as well as the Employment</p>	Noted

<p>Land Review which forms part of the emerging evidence base for the RLDP. It starts with the headlines of the current position and background, considers the current policy position before commenting on the Growth and Spatial options, Employment Land Review and general comments.</p>	
<p><u>St. Modwen Park Newport – current position and background</u></p> <p>St. Modwen Park Newport is part of a very significant mixed use regeneration project. The site (and the EEA that it forms part of) is one of the cornerstones of Newport’s sustainable growth strategy. Outline planning permission was granted in April 2010 for the whole scheme (ref. 06/0471). The basic proposition is a new neighbourhood of approximately 4,000 new homes in a high quality (and transformed) environment, a local centre and a business park (now known as St. Modwen Park, formerly Celtic Business Park).</p> <p>The wider site is rectangular in shape with longer sides of approximately 2km and shorter sides of 1km. Its western boundary is formed by Newport Retail Park District Centre (Spytty), its northern boundary by the Tata and main railway lines and its eastern boundary by the retained Tata Llanwern Steelworks. Its long southern boundary is formed by the Queensway (A4810). St. Modwen Park Newport is approximately 37 hectares that sits on the eastern side of the wider site and is therefore strategically located to provide excellent connectivity to South Wales and South West England, with Junction 23A of the M4 motorway within two miles of the park via Queensway, and Cardiff and Bristol reachable within 12 miles and 30 miles respectively. The estate and surrounding area benefit from the de-tolling of the Severn Bridges, further enhancing its accessibility by road.</p> <p>St. Modwen Park Newport has its own sub area masterplan which was approved in 2015, known as the Employment Area Masterplan. The main road access has been approved and installed and the first four phases for business units have Reserved Matters approval, with some built and occupied and others expected to be constructed shortly. Phase 1 saw Unit 1 constructed and occupied by Amazon. Phase 2 saw two units (Units 2 and 3) built and occupied by Mitel and Genpower respectively. Phase 3 saw the development of CAF’s train manufacturing plant developed in the northern part of the site. More recently, Phase 4 secured Reserved Matters approval in July 2021 and has recently been built out, delivering a further four business units (Units 4-7). Phase 5 (Units 8-10) secured Reserved Matters approval in March 2022, delivering three additional units (Units 8-10).</p> <p>SML is committed to the ongoing redevelopment of St. Modwen Park Newport with further Reserved Matters applications expected to follow during 2023-25 for the balance of the site. The successful delivery at Glan Llyn and St. Modwen Park Newport to date has been achieved in very difficult market conditions – especially at the beginning of the development process for a very large scheme. Very few other sites have made anything like the progress that Glan Llyn has in these conditions. The site is allocated in the current Local Development Plan (January 2015) (“LDP”). Given the success of recent phases and number of remaining phases to be developed it is therefore entirely reasonable for NCC to continue to allocate St. Modwen Park Newport for redevelopment in the RLDP (2021-2036) and to</p>	<p>Noted</p>

<p>expect rates of development to increase as economic conditions improve and further key milestones are made with the next phases of business units at St. Modwen Park Newport.</p>	
<p><u>Existing planning policy</u>  <u>Future Wales – The National Plan 2040 (February 2021)</u>  Policy 33 (National Growth Area – Cardiff, Newport and the Valleys) recognises Newport as part of a wider National Growth Area across the south east. The policy notes:  “Cardiff, Newport and the Valleys will be the main focus for growth and investment in the South East region. Strategic and Local Development Plans should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure.”  The policy continues:  “The Welsh Government supports an increased strategic role for Newport as a focus for sustainable, long-term growth and investment. The Welsh Government will work with authorities within the region and in England to promote Newport’s strategic role and ensure key investment decisions in Wales and England support Newport.”  It is therefore clear that, at a national level, the strategic and sustainable development of regeneration schemes, of which St. Modwen Park Newport is a part, should have full support.  <u>Planning Policy Wales (Edition 11, February 2021)</u>  Planning Policy Wales (“PPW”) is specific in recognising a sequence of site allocations that “prioritises the use of previously developed land and existing buildings.”  Paragraph 3.43 notes:  “In developing their spatial strategy planning authorities must prioritise the use of suitable and sustainable previously developed land and/or underutilised sites for all types of development. When identifying sites in their development plans planning authorities should consider previously developed land and/or underutilised sites located within existing settlements in the first instance with sites on the edge of settlements considered at the next stage.”  Paragraph 3.55 adds:  “Previously developed (also referred to as brownfield) land (see definition overleaf) should, wherever possible, be used in preference to greenfield sites where it is suitable for development.”  <u>Local Development Plan (January 2015)</u>  Following the closure of the former Llanwern Steelworks site, NCC allocated the former ‘heavy end’ of the steelworks and other land in the vicinity in its Unitary Development Plan (“UDP”) as the Eastern Expansion Area (“EEA”). This allocation continues in the current LDP under Strategic Policy SP11. Policy EM1 provides an employment allocation for St. Modwen Park Newport (then known as Celtic Business Park). The strategy of the current LDP recognises that the EEA is integral to the city’s growth strategy and is underpinned by the allocation and delivery of the Glan Llyn regeneration site.</p>	<p>Noted</p>

<p>Strategic Policy SP11 relates solely to The Eastern Sub Area and states that:  ‘The Eastern Expansion Area consists of the former Llanwern Steelworks regeneration site known as Glan Llyn H1(47) and EM1(vii), and housing sites at Llanwern Village H1(3), Hartridge High School H1(19) and Jigsaw Site H1(55). This Eastern Expansion Area is identified as a residential led <u>mixed use</u>, sustainable urban expansion area which will provide a range and choice of housing, <u>employment land and community uses</u>.’[Emphasis added]</p> <p>As well as supporting wider growth and regeneration ambitions, St. Modwen Park Newport helps NCC deliver its employment land requirements in a sustainable way. St. Modwen Park Newport will likely contribute to employment land requirements within and beyond the current LDP plan period of 2011-2026.</p>	
<p><u>Comments on Growth and Spatial Options (January 2023)</u>  As a high-level document, the RLDP’s Growth and Spatial Options sets out six growth options and four spatial options. The options are informed by the current situation and key issues for the RLDP to address via its Preferred Strategy which is expected to itself be consulted upon in Autumn 2023. SML’s general observations are set out below.</p> <p><u>Growth Options</u>  Appendix A of the document identifies 11 Growth Options which, on page 5 of the document, are narrowed down to “six realistic alternative options, which more align with Newport’s national role as an area for growth.” SML has no comments to make at this stage other than, under all options, it is clear St. Modwen Park Newport is capable of making a significant contribution to the delivery of employment floorspace (which translates into jobs) over the RLDP plan period which should be fully considered under all Growth Options. SML reserves its position to make further comment in the future.</p> <p><u>Spatial Options</u>  Appendix B of the document identifies four Spatial Options. These are PDL-led, Urban Expansion, Village Focus and Hybrid Approach. SML has limited comments to make at this stage other than, under all options, provision and allowance must be made for the continued delivery of phases of St. Modwen Park Newport. SML reserves its position to make further comment in the future.</p>	Noted
<p><u>Employment Land Review (February 2022)</u>  There is significant value derived from the industrial and logistics sector nationally and locally to Newport. The ‘Levelling up – The Logic of Logistics’1report prepared by the British Property Federation and Savills in 2022 demonstrates the wider economic, social and environmental benefits of the industrial and logistics sector. The Covid-19 pandemic reiterated how industrial and logistics facilities are a key part of the nation’s critical national infrastructure. The report notes that industrial and logistics sector generates significant economic benefits, employing millions of people nationally and representing approximately £232 billion Gross Value Added.  [1 <a href="https://bpf.org.uk/media/4772/levelling-up-the-logic-of-logistics-bpf-report.pdf">https://bpf.org.uk/media/4772/levelling-up-the-logic-of-logistics-bpf-report.pdf</a>]</p>	Noted

<p>To this end, SML welcome the recognition and value St. Modwen Park Newport’s role in the Newport and South Wales economy is playing as evidenced in the Employment Land Review. For example, paragraph 4.16 (page 49) credits SML with stimulating the market with its commitment to advance speculatively build while paragraph 8.1 (page 103) recognises schemes are being “activity [sic] developed, including some speculative development, primarily for mid to larger units targeting the logistics sector.”</p> <p>SML support St. Modwen Park Newport’s grading of 14/15 in Table 11 (page 81), however note it is not clear how these gradings were derived and how individual sites scored against the Welsh Government criteria. The methodology and calculations should be provided as an appendix. Similarly, SML support St. Modwen Park Newport’s grading of 27/30 in Table 13 (page 85), however note it is not clear how these gradings were derived. The methodology and calculations should be provided as an appendix. SML reserves its position to make further comment in the future in respect of employment land matters.</p> <p><u>General comments</u></p> <p>SML strongly encourage NCC to ensure that emerging planning policy (and how it may be positively, pragmatically and timely applied during development management stages) continues to support the economic development and job opportunities for Newport, such as the delivery and build out of St. Modwen Park Newport.</p> <p>As noted in ‘Levelling up – The Logic of Logistics’ report, the UK planning system is restricting growth. Planning policies must therefore be used to encourage inward investment and developments that look to support direct and indirect economic development within Newport. Employment allocation and protection policies must also look to support facilities/uses complementary to employment areas should they be required – for example, roadside facilities, electric vehicle charging infrastructure, food/drink units and other uses where appropriate within employment areas. In this sense, the wording of Policy EM1 of the current LDP (which notes “the allocations will be protected for employment uses, and alternative uses for the sites will be resisted”) is considered too restrictive and fails to recognise the value complementary alternative uses may provide. It is therefore suggested as the RLDP progresses to draft policies, a criteria-based policy is provided that seeks to enable such complementary uses where appropriately justified. SML would welcome the opportunity to review and consider draft wording of such in due course.</p> <p>With specific regard to industrial and logistic sectors, the Welsh Government and NCC must do all they can to support logistics sector and improve travel movements along the M4, especially following the scrapping of the M4 Relief Road in 2021 and more recent announcements and consequences of the ‘Roads Review’ findings in February 2023. To this end, SML would welcome further engagement with Welsh Government and NCC in identifying ways to encourage logistics development across South Wales.</p>	
<p><u>Conclusion</u></p>	<p>Noted. The Growth and Spatial Options taken forward is discussed in detail in the Preferred Strategy Cabinet Paper,</p>

<p>As stated at the beginning of this letter, SML seeks to reiterate and endorse St. Modwen Park Newport’s importance as a key employment site delivering significant employment and regeneration benefits which must be reflected in the RLDP under all growth and spatial options presented. This reflects the planning position and delivery on site to date and the clear potential of the scheme to continue to provide employment floorspace to meet growing demand from businesses who are looking to expand their operations but have been restricted by a chronic undersupply of space across the region.</p> <p>The scheme is a major sustainable regeneration initiative and is a true commitment – outline planning permission has been granted, the site is in the hands of SML (an active and experienced industrial and logistics development company), significant and substantial infrastructure has been installed, several phases have been developed and future phase of development are in the pipeline. St. Modwen Park Newport continues to warrant clear planning support and should be identified as a priority and objective for the RLDP via a specific allocation(in much the same way Policy SP11 (Eastern Expansion Area) performs in the current LDP).</p>	<p>the Preferred Strategy Consultation Paper and associated Background Papers.</p>
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**GSO 028 - Mineral Products Association - 00060**

<b>Question / Response</b>	<b>Officer Response</b>
<p>The Mineral Products Association (MPA) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and silica sand industries. With the affiliation of British Precast, the British Association of Reinforcement (BAR), Eurobitume, MPA Northern Ireland, MPA Scotland and the British Calcium Carbonate Federation, it has a growing membership of over 530 companies and is the sectoral voice for mineral products. MPA membership is made up of the vast majority of independent SME quarrying companies throughout the UK, as well as the 9 major international and global companies. It covers 100% of UK cement production, 90% of GB aggregates production, 95% of asphalt and over 70% of ready-mixed concrete and precast concrete production. In 2016, the industry supplied £18 billion worth of materials and services to the Economy. It is the largest supplier to the construction industry, which had annual output valued at £169 billion in 2018. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors. For more information visit: <a href="http://www.mineralproducts.org">www.mineralproducts.org</a>.</p> <p>With reference to the above consultation and further to our previous representations, we have no specific preference on the growth and spatial options outlined, however we would welcome further detail on how the aspirations of the plan will be delivered. This should be assessed as part of the evidence base to deliver policy aspirations.</p> <p>From a mineral's perspective, it is imperative that mineral reserves and planning consents are delivered through the plan policies. Delivering a steady and adequate supply of raw materials will be essential to ensure growth and deliver high quality homes whilst maintaining local vernacular. The supply of minerals</p>	<p>Noted As part of this process the LDP team will continue to work with partners, during the preparation of the replacement LDP to ensure any amendments to policy reflect the opportunities identified.</p>

can not be assumed by the Council. Maintaining a steady and adequate supply of minerals will be reliant on delivering appropriate production capacity and it is important that to deliver the development aspirations of the plan, sustainable supply patterns are considered.

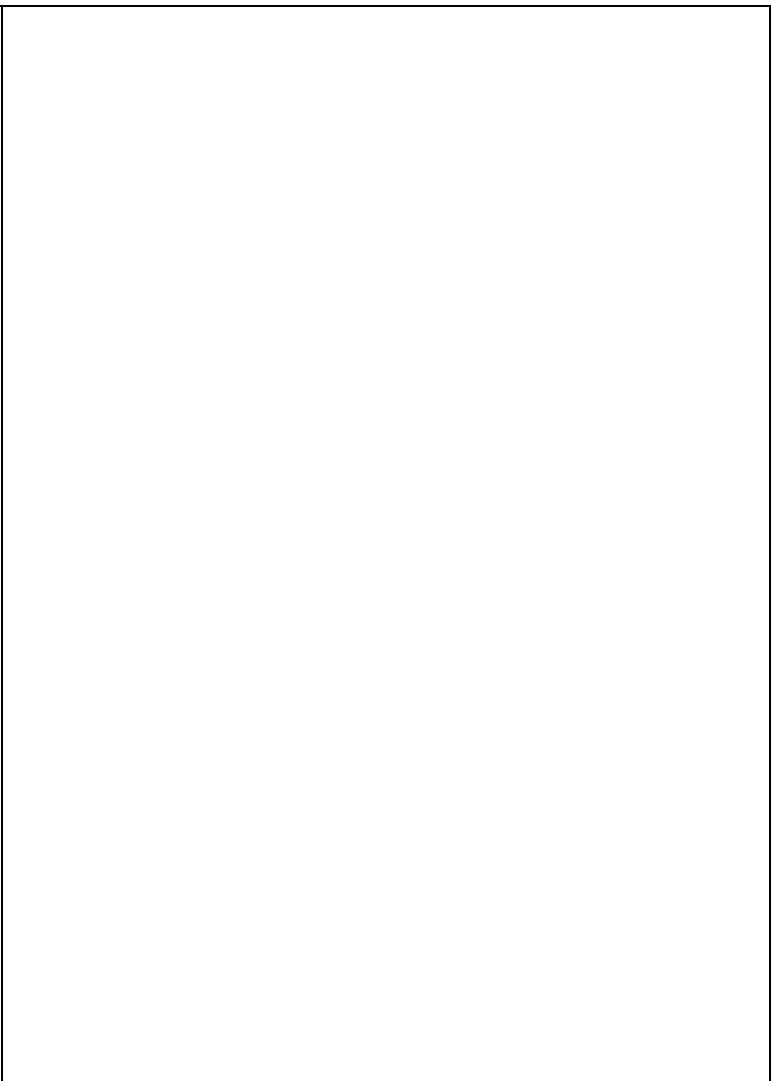
The Regional Technical Statement (RTS) and MTANs are important foundation documents for inclusion in the RLDP review. The RTS 2nd Review published in September 2020 and endorsed by the Council identifies the minimum allocation needed to meet the required provision of crushed rock tonnage for Newport over the plan period. The minimum allocation should be delivered in the plan through appropriate site allocations and criteria-based policies.

The RTS requires the production of a Statement of Sub-Regional Collaboration (SSRC) to be agreed with all other constituent LPAS within the local sub-region, prior to Examination as part of the evidence base. This is essential to ensure Newport can meet its consumption of minerals and mineral products. Development of the SSRC should demonstrate that the SSRC has been produced in consultation with relevant stakeholders, including the South Wales Regional Aggregate Working Party (SWRAWP).

Newport is largely reliant for its sand and gravel on marine-dredged aggregates from the Bristol Channel, imported marine wharves. The RLDP should identify all existing and potential new wharves and railheads for safeguarding, in order to provide a full range of sustainable transport options (whether or not they are currently utilised).

Although potential land-based aggregate resources are indicated within its area on BGS resource maps, many of these may be sterilised by existing built development. However, PPW requires the safeguarding of primary aggregate resources and resources of both crushed rock aggregates and land-based sand & gravel should be safeguarded within the RLDP in accordance with the British Geological Survey's safeguarding maps, or such other geological information as may be available and suitable for this purpose. This will be more apparent as there is greater pressure to release greenfield sites for other competing developments and the council must therefore consider prior extraction where known mineral resources may be sterilised. It is also important to ensure the mineral safeguarding policies are robust and properly understood as the current AMR suggests there is a need for more training when dealing with applications affecting MSAs.

Finally, the evidence base should give due consideration to the preparation of a resource assessment and consider supply chain options to ensure the plan is deliverable and the management of natural resources is sustainable.



**GSO 029 - Persimmon Homes And Welsh Government - 00641**

Question / Response	Officer Response
<p><b>GROWTH OPTIONS:</b>  <b>Growth Scenarios -</b></p>	



**1. Are there any scenarios that have been discounted which should be considered further, and why?**

**2. Which of the options do you feel is the most appropriate, and why?**

**Assessment of Growth Options Against RLDP Objectives -**

**3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?**

The starting point for any consideration of growth options must be an appreciation of the role of Newport as part of the National Growth Area, as defined by Future Wales. Policy 33 states that this area “will be the main focus for growth and investment in the South East region” and that “The Welsh Government supports an increased strategic role for Newport as a focus for sustainable, long-term growth and investment.” These policy objectives set the scene for the identification of an appropriate level of housing growth in Newport over the RLDP period.

Table 2 of the Growth and Spatial Options document identifies five housing growth options. These range from 507dpa to 838dpa. These options were selected from a longer list of 12 options that were identified and assessed by Edge Analytics (as illustrated in Table 1 of the Growth and Spatial Options document). We note that the four lowest scenarios identified by Edge (with an annual housing requirement of between 319 and 439dpa) were discounted on the basis that they “are much lower than the adopted growth strategy” and “do not reflect Newport’s focus for growth role established by the Future Wales National Plan 2040.” We agree that these low growth scenarios were appropriately discounted but consider that the same conclusions can also be drawn in respect to the proposed Options 2 to 6 inclusive (i.e. housing growth of 507-632dpa):

1. Two of these growth options (Options 5 and 6) would fail to accommodate the level of population growth that has been anticipated by the Welsh Government 2018-based population projections over the LDP period to 2036. This would raise very significant concerns in relation to the vitality of the local community, the strength/scale of the local workforce, and the well-being of future generations. In considering the Welsh Government projections it is noted that they are based on dampened assumptions in relation to fertility and mortality. These assumptions suppress future birth trajectories and increase the rate at which deaths occur due to a reduction in life expectancies. The implication of this is to potentially under-state the level of population growth that is likely to occur in the future.

2. Options 2-6 would all represent a reduction from the current LDP requirement for 690dpa. Over the 15-year LDP period, these would result in the delivery of between 780 and 2,745 fewer homes than would otherwise be associated with a continuation of the existing LDP housing requirement. It is not considered that this would be in keeping with the ambition for a growth strategy for Newport.

3. These options also represent a reduction from past trends; since the start of the LDP period in 2011, an average of 624dpa have been completed (higher than Options 4-6 inclusive and closely aligned with Options 2 and 3) whilst an average of 725 new homes have been delivered each year since the LDP was adopted in 2015 (higher than Options 2-6 inclusive). The Development Plans Manual acknowledges the role of past trends in setting future housing requirements, but it is difficult to see how this would align

Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.

<p>with a “policy-on” growth strategy as required by Future Wales. Whilst it is acknowledged that past levels have been above longer term trends, a reduction from this level of housing delivery is not reflective of a growth strategy.</p> <p>4. The Welsh Government has been very critical of the level of housing growth that was proposed in the Monmouthshire LDP. It stated that:  “The WG principal housing projection for the plan area, 2,610 units, provides a starting point for the level of housing required. In recognition of build rates achieved over the last 10 years, a higher level of housing may be justified. The proposed level of housing growth should however be no greater than 4,275 units (15 x the 10 year build rate) plus an appropriate flexibility allowance. This will ensure that Monmouthshire continues grow in a sustainable manner based on a locally appropriate level of development which is compatible with policies 1 and 33 of Future Wales.”</p> <p>In considering the applicability of this approach to Newport, it is important to recognise that the Welsh Government’s concerns to the Monmouthshire Preferred Strategy was rooted in the fact that it does not form part of the National Growth Area. The purpose of the National Growth Areas is to act as a focus for growth in employment and housing. A trend-based approach would therefore directly conflict with these aspirations for enhanced growth. Nevertheless, application of a similar approach to Newport would result in a requirement for 646dpa plus a flexibility margin. That figure (even without the margin) is higher than Options 2-6 inclusive.</p>	
<p>5. A review of ONS Jobs Density data shows that employment in Newport increased from 79,000 to 84,000 between 2011 and 2021 (an average of 500 per annum) and from 77,000 to 84,000 between 2015 and 2021 (an average of 1,167 per annum). Against this context, Options 5 and 6 identify an average of 448 and 389 additional jobs per annum (respectively) – lower than past trends since the start of the current LDP period whilst Options 2-4 identify an average of between 576 and 713 jobs per annum – lower than employment growth since the LDP was adopted in 2015. Even Option 1 indicates a lower level of future employment growth (863 jobs per annum). This highlights a risk that Newport Council might be planning for a reduced rate of future employment growth compared to historic rates. This again sits at odds with the role of Newport within the National Growth Area and the aspirations for economic growth within the CCR.</p> <p>Against this context, it is a matter of concern that the growth scenarios that have been identified point towards a reduction in the rate of housing delivery and that only one high growth option has been considered. It is noted that Edge Analytics did test a PG-Short Term scenario which gave rise to a need for 807dpa but that was disregarded on the grounds that “the two scenarios at the high end of the scale are similar, resulting in overall scales of growth that are only marginally different.” It is accepted that there was only a 3.7% difference in the housing need associated with these scenarios but such a conclusion is difficult to justify in the context of the similarity between Options 2 and 3 (0.9%), Options 5 and 4 (1.85%)</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p> <p>The Demographic Evidence, Employment Land Review (NB not executive summary) detail what key economic factor have been considered.</p>

and Options 4 and 6 (4.3%). In the context of a growth area and with Newport's central role, it is a matter of concern that insufficient consideration has been given to the higher levels of growth.

Of the scenarios that have been shortlisted in the Growth and Spatial Options document, we therefore consider Option 1 to be the only one that is appropriate and that would reflect the status of Newport as part of the National Growth Area. As set out above, however, we consider that the PG-Short Term scenario (807dpa) should also have been given further consideration. These are the only two options that would provide the basis for growth when compared to the business-as-usual approach associated with the existing LDP and past trends.

In preparing the LDP, it is important to note that the evidence prepared by Edge Analytics and the Growth and Spatial Options document refer to the level of need for housing over the LDP period. In translating this figure to a LDP requirement, it is appropriate to apply a flexibility margin, as required by paragraph 5.59 of the Local Development Plans Manual:

"It will be extremely rare that all sites identified in a plan will come forward in the timescale anticipated. Whilst there is a need to improve certainty through frontloading, as described earlier in the Manual, there may be instances where site specific circumstances, unknown at the plan making stage, delay the delivery of sites. A development plan will not be effective if it cannot accommodate changing circumstances. This means that a flexibility allowance must be embedded into the plan. The plan will need to evidence there is sufficient flexibility above the requirement to account for non-delivery and unforeseen issues ... The level of flexibility will be for each LPA to determine based on local issues; the starting point for such considerations could be 10% flexibility with any variation robustly evidenced. The policy framework in the plan should be clear regarding the housing requirement, provision, and flexibility allowance. The level of flexibility chosen by the LPA when the plan goes on deposit is broadly maintained upon adoption of the plan." (emphasis as per Development Plans Manual).

The current Newport LDP has a flexibility margin of 12.3%. This is closely aligned with the figures of adjoining authorities, as summarised below:

1. Cardiff: 9.6%
2. Caerphilly: 19.0%
3. Torfaen: 22.1%
4. Monmouthshire: 10.0%

Going forwards, we would advocate a flexibility margin of 10% as the absolute minimum that should be applied. In the light of this, and in order to ensure consistency with the role of Newport as part of the National Growth Area, we would advocate the requirement for between 807-838dpa. Application of the 10% flexibility margin to these figures would result in a requirement for 890-900dpa –equivalent to 13,350-13,500 over the LDP period. This level of growth would reflect the status of Newport as part of the National Growth Area. In particular, this level of growth would support economic and employment growth, ensure an appropriate level of expansion in the local labour force, facilitate the regeneration of

<p>deprived communities, and support the enhancement of community and social facilities. As set out in this submission, there is clear evidence that this level of growth could be accommodated without any adverse environmental impacts.</p>	
<p>Table 3 of the Growth and Spatial Options document provides a summary of the assessment of the six growth options (as identified on Table 2). These appear to be weighted against population and economic metrics, in favour or environmental considerations. There are a number of inconsistencies in the scores that have been applied and the impact of each option will be largely dependent on the spatial distribution of growth. Of particular concern:</p> <ol style="list-style-type: none"> <li>1. Options 1-4 all score equally in respect of the economy and employment, even though the number of jobs supported by scenario 1 is 50% higher than that associated with scenario 3. This difference would be significant in terms of realising Newport's potential as part of the National Growth Area and contributing towards the ambitions for the CCR.</li> <li>2. Options 1-3 have all been awarded the same score in relation to population and communities even though scenario 3 would result in a level of population growth that is lower than that experienced between 2011 and 2021 (1,247 per annum cf. an average increase of 1,386 per annum between the 2011 and 2021 censuses). Such an outcome cannot reasonably be concluded as reflective of Newport's regional and national role. Higher levels of population growth can help to counteract the impacts of an aging population as growth will primarily arise from in-migration amongst younger age groups. Imbalances in the demographic structure as the population ages could otherwise lead to a shrinking labour force having to fund and deliver an increasingly stretched social care programme.</li> <li>3. It is unclear why all six scenarios have been awarded the same score in relation to health and wellbeing, with the same comments being made for all – that the new housing and employment “could enhance the labour force, introduce new skills or economic opportunities”. This is despite some of the lower growth scenarios resulting in a much lower level of population growth compared to past trends and the Welsh Government projections and a reduction in the size of the labour force.</li> <li>4. In relation to transport and movement, scenario 3 (638dpa) is awarded a green score (positive contribution) but scenarios 2 (632dpa), 4 (530dpa) and 5 (540dpa) have all been awarded an amber score (positive and negative outcomes). This is in spite of the comment for scenario 4 stating that it would result in “much less development pressure for housing than in Options 1, 2 and 3.” It is not clear how this conclusion was reached.</li> <li>5. Similarly, scenario 3 is the only option to have been awarded a red score for historic environment, with scenario 4 the only option to have been awarded a green score in relation to this metric.</li> <li>6. Critically, we note that no specific regard appears to have been given to access to housing and the delivery of affordable housing in particular. Whilst these issues are contained within the population and</li> </ol>	<p>This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.</p>

<p>communities category, they are addressed alongside a number of other matters (the provision of “the necessary social, environmental, cultural and physical infrastructure to provide safe and healthy places for people that maintain and enhance community and settlement identities”). Given the importance of housing supply, we consider that it should be identified as a specific objective and considered separately to the broader theme of population and communities.</p>	
<p>No information is provided as to how the conclusions of this simplistic “traffic light” analysis will inform the next stages of the LDP process, other than to state that all of the options will be subject to the Sustainability Appraisal and further analysis. In advance of these next stages, it will be important that the Council provides further clarity to the way in which the various metrics are scored and that it ensures that a consistent approach to site assessment is provided. In particular, more equal weighting should be provided to the economic and social factors in order to reflect the status of Newport as part of the National Growth Area</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.</p>
<p><b>SPATIAL OPTIONS:</b>  <b>8. Which of these options do you feel is the most appropriate, and why?</b>  <b>9. Are there any other spatial distributions that should be considered, and if so, why?</b>  <b>10. Are there any other matters that should be given consideration when assessing these?</b></p>	
<p>These representations have been prepared as part of our on-going promotion of the land north of Llanwern for allocation in the RLDP as a residential-led strategic mixed-use development. We consider this to represent one of the best opportunities for development in Newport over the RLDP period. It has the capacity to make a significant contribution to Newport’s future housing need through the delivery of 2,500 new homes in a sustainable location that is well related to the city and accessible by a range of active and public transport modes. Whilst we appreciated that the diagrams in Appendix B of the Growth and Spatial Options consultation document are illustrative only, we welcome the fact that all other than the PDL-led scenario identify land south of the M4, east of the A48 and between the settlements of Llanwern/Milton and Underwood as a broad location for new housing growth. This location clearly aligns with that of the proposed development north of Llanwern.</p> <p>The identification of this area as a location for housing growth reflects the reality of the constrained nature of Newport. Very large parts of the city are within the floodplain and there are significant areas of statutory land designation including National Nature Reserves and Sites of Special Scientific Interest. In addition, the land north of the M4 motorway has been identified in Future Wales 2040 as an area for consideration for a new Green Belt. These constraints, which are illustrated below and explored in more detail in this section, severely limit the opportunities for development in Newport and for it to provide the strategic focus for growth, as anticipated by Future Wales 2040. Against the context of these significant constraints, there is a major opportunity for growth to the east of the city on land between Llanwern village and the M4 motorway. We welcome the fact that this has been recognised in the Spatial Options.</p> <p>-</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.</p>



Given the extent to which the existing urban area of Newport is subject to flood risk designations, it is likely that a high proportion of brownfield land will also be at risk of flooding and therefore not suitable for residential development. Even where the redevelopment of sites may be acceptable in principle in terms of appropriateness in relation to flood zones, developers may face further financial barriers in ensuring that proposals are resilient to flooding by investing in flood mitigation/management measures. Such costs would be in addition to those associated with clearing the site from existing development and addressing any potential contamination issues. The increased costs associated with flood mitigation and management measures for new developments may have an increasingly detrimental impact on the viability and deliverability of a significant proportion of PDL. Given that the cost of brownfield development is typically higher than greenfield development, the implication of this is that an overreliance on PDL could militate against meeting the identified level of housing in the LDP.

Whilst the intention to drive employment and housing growth to Newport City Centre in order to further stimulate and regenerate the city centre is recognised and supported, there needs to be a range and choice of sites available to meet identified housing needs. Newport's role as part of the National Growth Area provides an opportunity for growth in the Plan area and the focus should be on the identification of sites that are deliverable and free from constraints.

The principle of brownfield-development is recognised and supported it is important that the RLDP strategy is capable of achieving its aims, including in relation to the delivery of new housing. However, we would be concerned that any over-reliance on PDL would threaten the Council's ability to accommodate the level of growth that is needed and thereby undermine its contribution to the National Growth Area. The RLDP should support the redevelopment of brownfield sites but should not be rooted in a strategy that is wholly or largely reliant on this source of land.

#### Forthcoming TAN15

The forthcoming update to TAN15 (Technical Advice Note on Development, Flooding and Coastal Erosion) (that is currently being consulted on) places a significant proportion of the city centre in Flood Zones 2 or 3 at risk from tidal and fluvial flooding (as shown on the proposed Flood Map for Planning). Whilst the amended proposed TAN15 is more flexible than the existing in that it makes allowances for PDL to be redeveloped for housing in Flood Zones 2 and 3, it specifies that this may strictly only apply to development categorised as 'redevelopment': "replacing an existing in-use building(s) (fully or partly) with a new building(s)." Development on vacant or disused brownfield sites is categorised as 'new development' alongside greenfield sites, indicating that the test is whether the site is currently in use. The Consultation Document states that "proposals for new development on undefended land should only be consented in exceptional circumstances and meet the criteria in paragraph 10.10" (page 35 of TAN15 Consultation Document, Jan 2023). As such, a vacant building or an area that has already been cleared for development face challenges in obtaining planning permission. This area of concern may be clarified following consultation on the proposed TAN15; however, this highlights potential limitations on the

quantum of PDL sites allocated in the existing LDP that have already been cleared for development being carried over to the emerging LDP. It also creates a further risk for a Plan strategy that is overly reliant on sites in areas of flood risk.

Other broad locations for new housing growth

The maps provided in Appendix B provide a broad idea of where the development of employment and housing land could be focused were the option to be pursued. The flood related implications of the majority of PDL being located in Newport City Centre have been explained above and this constraint will, to some extent, impact on the ability to accommodate growth in some of the other broad locations for housing that have been identified. However, there are other constraints that will restrict the delivery of other proposed housing sites identified on the urban expansion, village focus and hybrid approach maps. The majority of the potential growth locations identified under options 2-4 do not propose allocating housing on existing Green Belt land, although we note that under the Village Focus scenario, one site (adjacent to Marshfield) would appear to encroach into the Green Belt. Furthermore, a number of the locations identified by the Village Focus and Urban Expansion scenarios fall within the area identified in Future Wales for consideration as a future Green Belt. To this end, we note that the area shown in the plans in Appendix B as “assumed area under consideration for new Green Belt” is very much reduced in size from that set out in Future Wales. Newport Council should provide clarity as to the reasons for this reduction and confirm whether Welsh Government has accepted the area of search that is now proposed. This is an important consideration as it could jeopardise the delivery of a number of proposed growth areas.

It is further noted that under the Village focus scenario, a number of broad locations for growth are located within areas of existing land constraints (e.g. SLA and Green Wedges). Whilst it is accepted that non-statutory/local designations could be amended as part of the RLDP process, Newport Council would need to provide evidence to show that these are the most suitable locations for development, that new housing could come forward without harm to the wider landscape, and that there are no alternative and preferable locations for growth.

Against the context of these constraints, the proposed development site at Llanwern

1. Represents the right location for growth:

- a. Benefitting from a strategic location that is well related to Newport;
- b. Being largely free from the risk of flooding, not designated or proposed for designation as a Green Belt, not sensitive from a landscape and ecological perspective, and not designated as best and most versatile agricultural land; and,
- c. Having limited heritage assets, and the ability to integrate these into the development. This freedom from constraints sets it apart from the majority of sites in Newport.

2. Has the capacity to accommodate housing and employment growth together with a range of community facilities, all set within a very high quality environment.



<p>3. Is able to integrate with sustainable transport options and benefit from an extensive active travel network;</p> <p>4. Offers considerable opportunities for biodiversity net gain;</p> <p>5. Will provide zero carbon ready buildings;</p> <p>6. Will respond to economic imbalances and deprivation issues, both locally and at a local authority level.</p> <p>This site would therefore perform very well if considered against the scoring matrix that is contained within the Growth and Spatial Options document.</p> <p>Of the options that have been identified in the Growth and Spatial Options document, we would favour the Hybrid Option, albeit that this should be viewed in the context of the concerns set out above regarding:</p> <ol style="list-style-type: none"> <li>1. The quantum of remaining PDL in Newport; and,</li> <li>2. The viability and deliverability of housing in the city centre that is now constrained by flood risk designations.</li> </ol> <p>The implication of this is that a meaningful quantification of brownfield capacity should be undertaken in order to ensure that the RLDP does not over-state the potential contribution of PDL and thereby threaten its ability to meet the identified housing requirement. The release of greenfield land will be essential to meet the future development needs of Newport. These should benefit from sustainable locations, be well related to the existing urban area and free from constraints.</p>	
<p><u>Scoring</u></p> <p>As is the case with the assessment of Growth Options, we are concerned that the assessment of Spatial Options is weighted against population and economic metrics, in favour of environmental considerations and there are a number of inconsistencies in the scores that have applied:</p> <ol style="list-style-type: none"> <li>1. It is unclear why the PDL-led approach is shaded green in relation to the economy and employment given that it recognises that the quantum of PDL is finite, that a lack of suitable sites may affect Newport's role as a Growth Area, and that this spatial option may affect employment options;</li> <li>2. The relevance of the national policy to prioritise development of brownfield land to 'economy and employment' for the urban expansion and village focus options is not explained. The focus in this regard should be on the ability to accommodate sufficient growth. As presently drafted, the assessment would appear to conflate economic and environmental considerations. This is a matter of concern given that the assessment already appears to favour environmental considerations over socio-economic criteria.</li> <li>3. The framing of potential effects is not the same for PDL and urban expansion / village focus. Whereas PDL-led development is viewed in a positive light because of its potential to improve access to facilities in local areas, the potential for urban expansion / village focus to improve active travel infrastructure in and around villages is not noted as a positive.</li> <li>4. There appears to be an over-focus on improving access to facilities within the city rather than throughout the entire LPA area e.g. in suburban communities. For example, 'equality, diversity and</li> </ol>	<p>This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.</p>

<p>inclusion' is given a green score for PDL-led development because of its potential to meet specific needs throughout the city. However, this objective is scored orange for the urban expansion development option because "investment in these new facilities, infrastructure and services may mean existing facilities, infrastructure and services are not enhanced within existing urban areas", with little consideration to the fact it may be beneficial to residents living outside of the city centre, for example by enhancing access to facilities and/or improving the sustainability of existing services. New urban extension developments will form part of the city and will interact positively with neighbouring existing communities. They will provide new facilities that will be available to existing as well as new residents and will provide enhanced active travel and public transport infrastructure.</p> <p>5. There is repetition and an overlap in some of the comments between different objectives, e.g. comments relating to air quality management areas being placed under 'health and wellbeing' and under 'transport and movement'. Whilst it is recognised that there is naturally an overlap between objectives, more thought should be given to their placement to avoid an effective double-counting resulting in certain options receiving a worse rating.</p> <p>6. No specific regard appears to have been given to access to housing and the delivery of affordable housing in particular. Whilst these issues are contained within the population and communities category, they are lost alongside a number of other matters (the provision of "the necessary social, environmental, cultural and physical infrastructure to provide safe and healthy places for people that maintain and enhance community and settlement identities"). Given the critical need for increased housing delivery, we consider that it should be identified as a specific objective and considered separately to the broader theme of population and communities.</p> <p>7. We also note that no specific consideration has been given to freedom from flood risk in the assessment of spatial options. This a fundamental omission given that this represents such a significant barrier to residential development and a major constraint in Newport.</p>	
<p>As with the assessment of Growth Options, no information is provided as to how the conclusions of this simplistic "traffic light" analysis will inform the next stages of the LDP process, other than to state that all of the options will be subject to the Sustainability Appraisal and further analysis. In advance of these next stages, it will be important that the Council provides further clarity to the way in which the various metrics are scored and that it ensures that a consistent approach to site assessment is provided. In particular, more equal weighting should be provided to the economic and social factors in order to reflect the status of Newport as part of the National Growth Area.</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.</p>
<p><b>EVIDENCE BASE:</b></p> <p><b>11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</b></p> <p><b>12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</b></p>	

In progressing work on the RLDP, we consider that Newport Council should undertake a review of existing LDP allocations that have not been delivered and that could be rolled forward into the RLDP in order to demonstrate that they are likely to be delivered. This reflects the guidance in Table 18 of the Development Plans Manual:

“Allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan, aligning with PPW. There will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered. The sites should be subject to the same candidate site process requirements as new sites i.e. they must be demonstrated to be sustainable and deliverable. If an LPA wishes to retain such sites but cannot evidence they will be delivered, i.e. for aspirational or regeneration purposes, they can still be allocated in the plan but not relied upon as contributing to the provision. It will not be appropriate to include such sites in the windfall allowance. They should be treated as ‘bonus sites’”

As set out above, given the importance of ensuring an adequate supply of housing and affordable housing in particular, we consider that this should be framed into a separate objective rather than being included as part of the broader population and communities objective. Although a relatively minor alteration, this would reflect the critical importance of ensuring an adequate housing delivery in Newport over the RLDP period and will ensure that the growth and spatial options are assessed in the context of this key priority. In respect of the proposed development at north of Llanwern, we provide the additional information in the form of the following documents to further demonstrate its sustainability, deliverability and freedom from constraints. These factors set it apart from the other identified areas of search:

1. Landscape assessment;
2. Ecology update note;
3. Heritage assessment;
4. Archaeological assessment; and,
5. Agricultural land classification assessment.

We also provide an updated version of the red line site location plan. The previous site location plan excluded a broadly triangular area of land (which extended to c.6ha) to the north of the site. This has now been confirmed as forming part of Welsh Government’s ownership and can therefore form part of any future development on the site. Although the inclusion of this area of land will not have any significant impact on the overall development capacity of the site, it will allow for a more integrated masterplanning solution to be achieved.

In respect of the accessibility of the proposed development, we note that the South East Wales Transport Commission recommended that:

1. Plans for a new station at Llanwern should be endorsed (recommendation 6); and,
2. Llanwern village, Ringland and Lliswerry should be provided with good walking and cycling access to Llanwern station (recommendation 24).

Noted, the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers provide greater detail on this.

<p>The estimated delivery timescale for these recommendations is 2021-29, i.e. by the time that housing would be expected to come forward on the site. This supports the mobility strategy for the site and underlines the sustainability of the proposed development.</p> <p>[Documents also included:</p> <ul style="list-style-type: none"> <li>• 1662-Ecology Update Note 030323</li> <li>• 63760-02 Final Llanwern Archaeology Appraisal DBA 24-02-23o</li> <li>• 63760-02 Final Llanwern LDP Promotion Built Heritage Appraisal 24-02-23</li> <li>• 220807.Langstone Lane Llanwern ALC Report.23.v2</li> <li>• Incola 1048 R01a Llanwern Landscape Tech Report 03.03.2023</li> <li>• LF63760 - Llanwern - Site Location - 03.03.2023]</li> </ul>	
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**GSO 030 - The John Family - 00169**

Question / Response	Officer Response
<p>We set out herein our client's response to the Newport Local Development Plan (rLDP) Growth and Spatial Options consultation paper. Our client, the John Family, owns land at Cwrt Camlas, High Cross, that has been promoted for development through the LDP. Our clients are pleased to be able to have the opportunity to feed into the early stages of the Plan preparation process and hopes that their input is helpful in forming the key components of the Plan.</p> <p>Our clients are pleased to be able to have the opportunity to feed into the early stages of the plan preparation process and hopes that our input is helpful in forming the key components of the Plan.</p> <p>Summarily, our client's site is 2.91 ha in size and is situated to the northwest of Junction 27 of the M4 and comprises grazing land. A master planning exercise has been undertaken with input from a prospective developer and housing association that demonstrates it can potentially accommodate c. 70 dwellings. Development of the site will also provide potential improvements to facilities associated with the adjoining Children's Centre given its increasing importance as a resource for the local area.</p> <p>To the south the site immediately adjoins the recently constructed Serennu Children's Centre and housing estate of Cwrt Camlas and is bound to the west by existing housing on Cwm Lane. The northern boundary of the site is defined by Pensarn Farm Lane, whilst the eastern boundary is defined by hedgerows separating the site from further grazing land which is also in the ownership of our clients.</p> <p>Prospective housebuilders and housing associations have fed into the submitted proposals and our clients would welcome discussions with the Council on the contribution that the site can make towards</p>	<p>Noted. Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>

<p>the Plan. Indeed, our client is keen to demonstrate that the site would be deliverable, viable and sustainable such that they can provide a timetable for delivery to feed into the Council's trajectory both on terms of private and affordable homes.</p> <p>Our client's response to the Growth and Spatial Options consultation is set out below and is to be considered against their overarching role which is to assist the Authority in achieving the objectives of the LDP and the Future Wales aspiration for Newport to increase its Strategic Role in the region.</p>	
<p><b>GROWTH OPTIONS:</b> <b>Growth Scenarios -</b></p>	
<p><b>1. Are there any scenarios that have been discounted which should be considered further, and why?</b></p>	
<p>We are strongly of the view that it is appropriate to discount the low growth options. In this regard, Policy 33 of Future Wales states that the Welsh Government support an "increased strategic role" however this cannot be a continuation of its existing role or approach towards growth and the benefits that it can bring, rather it requires enhanced levels of growth and investment.</p> <p>Table 1 provides a useful point of reference for establishing how an increased strategic role may be facilitated. Clearly in order to comply with Future Wales the Plan requires a level of growth that is at the very least equal to or greater than the current LDP level of growth, as such it can not be justified removing the PG Short Term level of growth. Whilst they are very similar, this along with the Dwelling Led 5yr level are the only two approaches that would seek a higher level of growth than is presently the case and therefore comply with Future Wales, all of the others would imply a reduced strategic role.</p> <p>Notwithstanding this, we accept the Council's reasons for discounting at this stage in order to avoid duplication of consideration. We set out the reasons for a higher level of growth in more detail in our answer to question 2 below.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><b>2. Which of the options do you feel is the most appropriate, and why?</b></p>	
<p>It is clear that the only two options that are appropriate, in line with Future Wales and an increased Strategic Role for Newport are those that are higher than the existing LDP level and in this regard we strongly believe that the Dwelling Led 5yr level is the most appropriate. It is clear that Future Wales anticipates Newport growing "in and immediately adjoining" the settlement and an increased strategic role for the city. As such it is key that an aspirational level of growth is sought that seeks to drive the increase to reflect the strategic role that Newport plays and to drive the regional economy.</p> <p>We would note that Wales as a whole is facing its most significant challenges for some considerable time and it is without question the case that the Replacement LDP is being prepared under some of the most challenging societal and economic conditions since World War Two.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

<p>There are numerous factors providing the context for the level of growth sought which we believe point towards the higher levels. We set these out summarily below but note their importance in a higher growth requirement.</p>	
<p><u>Post Covid 19 recovery, energy crisis and Brexit</u>  It is clear that Newport faces significant challenges in order to achieve an increased strategic role in the context of the post Covid economy, Brexit Recovery and the ongoing energy crisis. Indeed, over recent years we have experienced exceptional circumstances that have the potential to severely and drastically impact upon the economy and society as a whole. We are strongly of the view that the planning process must play its part in helping to facilitate the economic recovery that is needed. Plainly economic recovery must form an over-riding requirement of the plan and without question must underlie the approach to be taken. An appropriate response to achieve an increased strategic role would be to plan for higher levels of growth than over recent plan periods.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><u>Constraints in adjoining Authorities</u>  In addition to meeting its own needs the Council will need to consider the lack of housing supply in neighbouring Authorities. Indeed, Future Wales is also clear that "Growth at Newport will help manage the development pressures in the region by providing a strategic growth focus for the eastern part of the area". Newport has not just been dealing with its own needs in recent years and accordingly needs to consider the offsets from new homes not being provided in its neighbouring authorities. Whilst housing land supply requirements were formally abandoned by the Welsh Government, it does not change the record of poor delivery elsewhere and it follows logically that where needs aren't met within an Authority, they will need to be accommodated somewhere. Whilst this is an unsatisfactory and unsustainable position there is unlikely to be any change in this in the short term. Indeed:</p> <ul style="list-style-type: none"> <li>- Torfaen &amp; Caerphilly - as of April 2021 there was a cumulative shortfall across the two Authorities of over 4,000 dwellings from the levels envisaged within their respective Local Development Plans. This represents the number of households that could not be provided for in those respective Authorities. This is a shortfall of national significance that has a profound effect on house prices across the region; and</li> <li>- Monmouthshire - representations made by the Welsh Government on the Monmouthshire rLDP mean that further new housing allocations would not be needed in Monmouthshire. Given the additional constraints in Monmouthshire, including Phosphates and anticipated marine nitrates, it is likely that demand will be displaced from Monmouthshire to adjoining Authorities.</li> </ul> <p>Plainly, policy and supply constraints in adjoining Authorities will have a significant impact upon Newport City Council in respect of the housing market and affordability issues. This is a challenge that the LDP needs to respond to with higher growth rates than previous years in order to achieve an increased strategic role.</p>	<p>Noted. NCC is supportive of cross council working and joint working and effectively tackling cross boundary issues.</p> <p>The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

<p><u>Meeting needs</u></p> <p>It will be of utmost importance to ensure Newport establishes a level of growth that meets needs and does not exacerbate the existing supply constraints in South Wales, taking into consideration the shortfalls in adjoining Authorities alongside Newport's own needs. We believe that the 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. In this regard it is noted that:</p> <p>-given the potential impacts of Covid 19 on the economy and society, there will be a need to adopt a highly ambitious strategy which provides far greater flexibility to respond to the crisis through added stimulation of the construction sector;</p> <p>-account should be taken in the baseline figures of the levels of sustainability and selfcontainment that can be achieved through embracing working from home trends for those sectors where it is feasible. These are often the high added value jobs that are no longer tied to cities such as Bristol or Cardiff but can retain expenditure in the local area and encourage vibrant local areas; and</p> <p>-any requirement should ensure an appropriate level of flexibility for delivery indeed, it may be that a 20% flexibility allowance or greater provides an appropriate starting point. We will comment on this further when detailed information becomes available.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><u>Addressing affordability</u></p> <p>The Council's result in nearly achieving its affordable housing target for 2015-2020 is to be welcomed. However, the Council recognise that this is only a small proportion of the actual level of need. The latest Local Housing Market Assessment (LHMA) indicates that "as of the 31st March 2017 there were 6,838 households with active applications on the housing waiting list. In order to clear this backlog during the 5 year life of this LHMA we would need to allocate 1,368 units of accommodation each year". The final stated annual shortfall is 559 per annum which equates to 2,795 over the five year period. This is plainly a significant issue within the Authority which has no doubt been exacerbated by price increases that have been caused due to shortages of housing supply outside of the County.</p> <p>Our client is of the view that the replacement LDP provides an opportunity to seek to address affordability in a meaningful and substantive way.</p>	<p>Noted</p>
<p><b>3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</b></p>	
<p>We have considered the assessment of each of the options and have commented where we believe that the assessment could be reviewed. Importantly, with regards to the lower growth options that are considered (options 2 to 6) in the first instance, we do not believe that these will contribute towards the Future Wales aim for Newport to have an increased Strategic Role in South Wales. This should form part of the assessment.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

<p><u>Option 1: 12,570 new homes and 12,945 jobs</u></p> <p>With regards to the higher growth option we have suggested that a number of the "colours" should be improved based on the potential for positive outcomes. Indeed, greater levels of investment in line with an Increased Strategic Role for Newport would have the potential to bring many significant benefits across the assessment areas. We are strongly of the view that this is the only option that would allow Newport to strive towards an increased Strategic Role in line with Future Wales. Our analysis is below.</p>		<p>This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.</p>
Economy & Employment	We support the overall conclusions of this assessment	
Population & Communities	We support the overall conclusions of this assessment	
Health & Well Being	We support the overall conclusions of this assessment	
Equality, Diversity and Inclusion	We support the overall conclusions of this assessment	
Transport & Movement	<p>Newport has been identified as a location for growth within Future Wales specifically because it is a sustainable location for growth. Its communities are well connected to public transport and well served by facilities. Indeed, our client's site at Cwrt Camlas is a clear example of this.</p> <p>We note that it is indicated that more opportunities for investment could be apparent under high scenarios, we believe that the Council's assessment should be more positive on this - indeed, higher levels of growth would enable a step change in investment and enhancement that could be a significant benefit. This should be re-assessed as green. Indeed, this is far more likely to be the case than for small scale, incremental and piecemeal infill development and ad-hoc brownfield sites.</p>	
Natural Resources	<p>We are surprised by the comments set out herein, it is noted that water consumption would increase for all options however, there are sustainable means of managing this.</p> <p>Much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts. New greenfield sites can provide a means of softening urban edges through more appropriate landscape buffers, open space and interface with rural areas.</p> <p>We also support the notion that greater investment brings the potential for more sustainable lifestyles, as greater facilities would exist and as construction techniques evolve and progress.</p>	



	We are strongly of the view that with appropriate planning interventions, this could be at least an orange category if not green.	
Biodiversity and Geodiversity	Again the categorisation red seems inappropriate (Option 5 and 6 are green) yet brownfield sites have equal (if not greater) chance of disturbing habitats and actually being unable to adequately mitigate. There is significant opportunity to provide ecological enhancement and net gain from greenfield sites, this includes to Sites of Importance for Nature Conservations (SINCs).	
Historic Environment	We would note that each case would need to be dealt with based on its own merits, albeit there are more heritage assets (including Listed Buildings and Conservation Areas) within the urban area than there are in surrounding green fields.	
Landscape	As noted earlier much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts. New greenfield sites can provide a means of softening urban edges through more appropriate landscape buffers, open space and interface with rural areas.	
Climate change	With regards to Flooding, there are considerable issues for existing properties in Newport, growth means higher investment and the potential to contribute towards solving existing problems. Increased investment in local facilities would mean potentially increasing sustainability. A higher growth strategy will actively prevent growth being dispersed. Indeed, low growth means that people would "jump" the green belt - leading to greater in commuting or travel to Bristol and Cardiff.	
<p>With regards to the remaining options, we note:  <u>Option 2: 9,450 new homes and 10,695 Jobs &amp; Option 3: 9,570 new homes and 8,640 jobs</u>  Given the similar scale of growth we consider both options in the following table in order to minimise duplication. It is noted in the first instance that these would be contrary to the Future Wales aspiration for Newport to achieve an increased strategic role.</p>		This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.
Economy & Employment	We support the overall conclusions of this assessment	
Population & Communities	We support the overall conclusions of this assessment	
Health & Well Being	We support the overall conclusions of this assessment	

Equality, Diversity and Inclusion	We support the overall conclusions of this assessment	
Transport & Movement	We support the overall conclusions of this assessment	
Natural Resources	As with option 1, we are surprised by the comments set out herein, it is noted that water consumption would increase for all options however, there are sustainable means of managing this. In addition, much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts. New greenfield sites can provide a means of softening urban edges through more appropriate landscape buffers, open space and interface with rural areas. We also support the notion that greater investment brings the potential for more sustainable lifestyles, as greater facilities would exist and as construction techniques evolve and progress. We are strongly of the view that with appropriate planning interventions, this could be at least an orange category if not green.	
Biodiversity and Geodiversity	Again the categorisation seems inappropriate (Option 5 and 6 are green) yet brownfield sites have equal (if not greater) chance of disturbing habitats and actually being unable to adequately mitigate. There is significant opportunity to provide ecological enhancement and net gain from greenfield sites, this includes to SINCs and Special Areas of Conservation (SACs).	
Historic Environment	It is unclear why options 2 and 3 are scored differently. We would note that each case would need to be dealt with based on its own merits, albeit there are more heritage assets (including Listed Buildings and Conservation Areas) within the urban area than there are in surrounding greenfield.	
Landscape	We support the overall conclusions of this assessment	
Climate change	With regards to flooding, there are considerable issues for existing properties in Newport, growth means higher investment and the potential to contribute towards solving existing problems Increased investment in local facilities would mean potentially increasing sustainability. A higher growth strategy will actively prevent growth being dispersed. Indeed, low growth means that people would "jump" the green belt - leading to greater in commuting or travel to Bristol and Cardiff.	

<p><u>Option 4: 7,950 new homes and 9,405 Jobs, Option 5: 8,100 new homes and 6,720 jobs &amp; Option 6:7,605 new homes and 5,835 jobs</u></p> <p>Given that Options 4, 5 and 6 are low growth options with broadly similar levels of new homes, we set out our combined comments on these options below in order to avoid duplication. It is noted in the first instance that these would be contrary to the Future Wales aspiration for Newport to achieve an increased strategic role.</p>		<p>This assessment was produce for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.</p>
Economy & Employment	We are of the view that these low growth options should all be categorised as red as they would not provide the combination of jobs and homes required to provide an increased strategic role for Newport	
Population & Communities	We are of the view that these low growth options should all be categorised as red as they would not provide the combination of jobs and homes required to provide an increased strategic role for Newport	
Health & Well Being	At the lower scales of growth these options are unlikely to provide the investment required in such facilities rather it would be a continuation of existing levels.	
Equality, Diversity and Inclusion	We support the overall conclusions of this assessment however,question whether this should be red given the importance of meeting needs.	
Transport & Movement	With each option there would be fewer opportunities for significant levels of investment in improved infrastructure or sustainable means of travel.	
Natural Resources	It is clear that lower growth levels would require less greenfield land which would clearly result in a continuation of the existing urban / rural interface. However, there are areas that could benefit from new landscaping / planting to soften the interface and provide visual benefits in this regard.	
Biodiversity and Geodiversity	The categorisation seems inappropriate and it is unclear why options 5 and 6 are green yet brownfield sites have equal (if not greater) chance of disturbing habitats and actually being unable to adequately mitigate due to more limited land availability on site. They do not have the same level of opportunity to provide ecological enhancement and net gain as greenfield sites, this includes to SINCs and SACs.	
Historic Environment	We would note that each case would need to be dealt with based on its own merits, albeit there are more heritage assets (including Listed Buildings and Conservation Areas) within the urban area than there are in surrounding greenfield.	

Landscape	It is clear that lower growth levels would require less greenfield land which would clearly result in a continuation of the existing urban / rural interface. However, there are areas that could benefit from new landscaping / planting to soften the interface and provide visual benefits in this regard.	
Climate change	With regards to Flooding, there are considerable issues for existing properties in Newport, growth means higher investment and the potential to contribute towards solving existing problems There would potentially be less investment in sustainability. Lower growth is likely to contribute towards increased commuting whereby people would be priced out of the local market and "jump" the greenbelt to alternative locations where homes are available.	
<b>EMPLOYMENT LAND OPTIONS:</b>		
<b>Recommendation One -</b>		
<b>4. Is this requirement appropriate for Newport?</b>		
We are supportive of the recommendations of the Employment Land Review which seek to protect 157.8 ha of supply in order to achieve the 77ha requirement. We believe that this approach provides flexibility to achieve the Future Wales approach towards increasing the Strategic Role of Newport.	Noted	
<b>5. Should it be different and if so, why?</b>		
As noted above, we support the recommendations of the Employment Land Review.	Noted	
<b>Recommendation Two –</b>		
<b>6. Should some sites be removed from the employment supply? Why?</b>		
The Employment Land Review recommends that all the sites listed in Table E1 of the Executive Summary are retained within the RLDP, this includes both the Solutia Site and Queensway Meadows, therefore it is unclear why their removal is being considered, further clarity over this would be required in order for us to consider further but based on the evidence available to date we oppose the removal of employment land. It is noted that if Newport is to achieve its increased Strategic Role, it is imperative that it is providing a balance of jobs and homes and a significant supply of deliverable land for both purposes is available.	Noted. The Employment Land Review (NB not executive summary) discusses this in more detail, including the recommendations regarding East of Queensway Meadows at section 8.8.	
<b>7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.</b>		
Given our response to question 6, we have no further comments on this question.	Noted	
<b>Spatial Options</b>		
<b>SPATIAL OPTIONS:</b>		
<b>8. Which of these options do you feel is the most appropriate, and why?</b>		

<p>We consider that the urban expansion option provides the most appropriate solution, this is framed on our approach towards growth which is based on the higher growth option (1) being the only approach that would be in compliance with Future Wales (i.e. an increased strategic role for Newport). For this reason we believe that the previously developed land (PDL) approach and Village Focus approaches should both be ruled out at this stage.</p>		<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><u>Urban Expansion &amp; Hybrid Options</u></p> <p>We note that there are various overlaps between the Urban Expansion and Hybrid Options, and we consider them jointly in the below table given the similarities. Indeed, we believe that given the lack of large suitable previously developed sites that may be available as new allocations, the PDL element is likely to be comprised of those existing allocations that are proven to be deliverable and capable of being rolled over alongside a small scale windfall assumption. As such with both options the amount of greenfield expansion land is likely to be similar given the scale of growth required in order to meet the strategic role of the City. However, we note that in respect of villages, it is likely to only be appropriate to consider small scale development parcels to meet local needs, rather than any significant scale of expansion.</p>		
<p>Our comments in respect of the assessment of both is set out below.</p>		<p>This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.</p>
Economy & Employment	<p>Future Wales is clear that growth should be in and around Newport. As such, this approach would clearly be in line with the policy hierarchy.</p> <p>It is noted that over recent years there has been a concentration of development in the east of the City, there would be an opportunity with urban expansion to re-focus on the west, north west and north of the City.</p> <p>We are strongly of the view that this should be green for both the Urban Expansion option and the Hybrid Option. Population &amp; Communities</p> <p>We support the overall conclusions of this assessment with respect to Urban Expansion and believe that the same conclusions could be drawn from the Hybrid Option due to the fact that a similar quantum of greenfield development will be required in both scenario.</p>	
Health & Well Being	<p>We support the overall conclusions of this assessment with respect to the Hybrid Option but believe that the same conclusions could be drawn from the Hybrid Option due to the fact that a similar quantum of greenfield development will be required in both scenario.</p>	
Equality, Diversity and Inclusion	<p>We believe that for both Urban Expansion and Hybrid Options, the assessment should be green. Indeed, both will facilitate significant opportunities for improvements and this should not be down played.</p>	
Transport & Movement	<p>Newport has been identified as a location for growth within Future Wales specifically because it is a sustainable location for growth. Its communities are</p>	

	well connected to public transport and well served by facilities. We note that it is indicated that more opportunities for investment could be apparent under high scenarios, we believe that the Council's assessment should be more positive on this – indeed, higher levels of growth would enable a step change in investment and enhancement that could be a significant benefit. This should be re-assessed as green. Indeed, this is far more likely to be the case than for small scale, incremental and piecemeal infill development and ad-hoc brownfield sites.	
Natural Resources	We are surprised by the comments set out herein, it is noted that water consumption would increase for all options however, there are sustainable means of managing this. Much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts. New greenfield sites can provide a means of softening urban edges through more appropriate landscape buffers, open space and interface with rural areas. This has been actively demonstrated on our clients site. We also support the notion that greater investment brings the potential for more sustainable lifestyles, as greater facilities would exist and as construction techniques evolve and progress. We are strongly of the view that with appropriate planning interventions, this could be at least an orange category if not green.	
Biodiversity and Geodiversity	Again the categorisation seems inappropriate yet brownfield sites have equal (if not greater) chance of disturbing habitats and actually being unable to adequately mitigate. There is significant opportunity to provide ecological enhancement and net gain from greenfield sites, this includes to SINC's. This is demonstrated by work undertaken on our client's site, where there are significant opportunities for betterment.	
Historic Environment	We would note that each case would need to be dealt with based on its own merits, albeit there are more heritage assets (including Listed Buildings and Conservation Areas) within the urban area than there are in surrounding green fields. Sites within our client's control would have no impacts on heritage assets.	
Landscape	As noted earlier much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts. New greenfield sites can provide a means of softening urban edges through more appropriate landscape buffers, open space and interface with rural areas.	

Climate change	With regards to Flooding, there are considerable issues for existing properties in Newport, growth means higher investment and the potential to contribute towards solving existing problems. As such, sites such as our clients where flooding is not a constraint but are in sustainable locations form a solution to this and cannot be considered negative. Increased investment in local facilities would mean potentially increasing sustainability. Appropriate levels of growth being identified would prevent growth being dispersed across numerous local authorities which has happened over recent years due to supply constraints. Low growth means that people would “jump” the green belt – leading to greater in commuting or travel to Bristol and Cardiff.	
<b>10. Are there any other matters that should be given consideration when assessing these?</b>		
In supporting our assessment of both the highest growth option and spatial approach which requires greenfield land, we set out below a number of key considerations in the benefits that they can bring. In particular in helping Newport to achieve an increased strategic role but also in terms of the other key assessment areas.	Noted	
<p><u>Sustainable growth locations</u></p> <p>It is inevitably the case that the supply of brownfield sites in Newport for redevelopment for residential purposes is limited. As such, the Council will need to consider sustainable and appropriate greenfield locations based around existing communities. In reality this is likely to focus on the western and north western parts of the County extents associated with existing built form and communities. Indeed, we are of the view that the LDP must not neglect the requirements of these existing communities in favour of more remote areas on the Eastern side of the City that would be more aligned to commuting patterns along the M4.</p> <p>It is anticipated that such focal points for proportionate growth include a number of existing communities where there are a number of local facilities that can provide an opportunity to maximise levels of self-containment and sustainability. Indeed, proportionate growth can help to reinforce existing levels of sustainability but also seek to provide additional facilities and uses that can move to a greater level of neighbourhood and community well-being. In this regard, our clients consider that High Cross is a suitable location for proportionate sustainable growth.</p>	The Deposit Plan will include reviewed urban and village boundaries.	
<p><u>High Cross</u></p> <p>It is considered that High Cross is a sustainable location for proportionate growth but there are very limited opportunities for such development with the exception of our client’s site. Indeed, their site is immediately adjacent to the recently constructed Serennu Children’s Centre and housing estate of Cwrt Camlas which laid access points into their land when it was constructed in anticipation that it forms a logical follow on.</p>	The Deposit Plan will include reviewed urban and village boundaries.	

The site occupies a sustainable location which is considered appropriate for residential development. The following services are available within the settlement, within walking distance of the site:

- Mini Market providing groceries, newsagent, a post-box and an off-licence – 160m;
- High Cross Primary School – 400m;
- Co-Operative Food Store – 500m;
- Texaco Garage – 500m;
- Athletics club – 500m;
- The Rising Sun Hotel and Restaurant- 550m;
- Hair salon – 600m; and
- Veterinary clinic – 600m.

A greater number of services are available at nearby Local Centres. Greenfield Road is 1.1km from the site and offers a convenience store, takeaway food outlets and beauty services. Thornbury Park is 1.5km from the site and offers a post office and takeaway food outlets.

In terms of education, High Cross Primary School is located within 400m walking distance of the site and Bassaleg Comprehensive School is situated 2.4km south of the subject site. In terms of Welsh-medium education, Ysgol Gymraeg Ifor Hael and Ysgol Gyfun Gwent Is Coed offer primary education 5.1km away and secondary education 5.7km away, respectively.

The Serennau Children’s Centre is located less than 100m from the site and provides activities and leisure uses for its users. Associated infrastructure includes a Multi-Use Games Area and two play parks.

The site is provided by the National Health Service, a public body, thus it is assumed that this area is available for public use.

Saint Anne’s Church Hall is 850m from the site and provides a communal space frequently used for leisure, health and fitness purposes (pre Covid-19). The Hall acts somewhat like a hub for community purposes, hosting a variety of fitness classes, group meetings and events.

An Athletic Club is 550m from the site and provides a sports and social club with cricket and rugby pitches. West of this, lies a large parcel of managed grassland with formal access points located at High Cross Road (270m from the site), Tudor Crescent, Ty-Du View and High Cross Drive. With informal paths passing through the site in many directions, this open space appears to be used both socially and leisurely for active uses by local residents. West of this lies a number of allotments (600m from the site) which are available to let from between £2.55 and £10.20 per annum.

The Fourteen Locks Canal Centre is located just 220m north-west of the site, and a Public Right of Way runs parallel to the Canal. This includes a shared cycle/foot path and bridleway, demonstrating that this space may be used both leisurely and socially by local residents.

Four bus stops are located within 550m of the site along High Cross Road, offering access to routes 56 and R1. Bus route 56 operates between Newport and Tredegar, providing 14 weekday services in each direction. Bus route R1 operates between Newport and Risca, providing 11 weekday services in each



direction. It takes approximately 15 minutes to reach Newport Bus Station via either of these routes, whereby a greater number of bus services offer access to a wider vicinity, including Cardiff, Chepstow and Monmouth.

The nearest rail station is located at Pye Corner, 1.3km walking distance south of the subject site. The station is located along the South Wales Valleys Line, which serves a number of routes surrounding Cardiff and the Valleys. More specifically, Pye Corner is situated on the Ebbw Vale Town – Treherbert line which travels via Cardiff Central. Westbound, this service operates between 07:13 and 23:17 providing 17 weekday services and eastbound this service operates between 06:16 and 21:33 providing 16 weekday services. The South Wales Valleys Line serves a greater number of local destinations, albeit these routes may require some changes.

In close proximity to the site, an established shared foot/cycle path runs parallel to the canal north of the site, serving National Cycle Route 47. This is a national route which extends from Fishguard to Newport. Considering the more local context, the Route passes between Risca and Brynglas, and offers opportunities to connect with a number of other Existing Route which serve the wider active travel network.

The wide array of local facilities afford an opportunity for future residents to maximise the proportion of their everyday lives within their local neighbourhood without relying upon the need for private car trips. It is considered an appropriate location for the provision of proportionate growth that would complement existing facilities and will provide more opportunities for local people to remain in the area. Importantly it would contribute to addressing a number of the issues set out within each of the draft Objectives in particular by virtue of the fact that it would be providing homes in a sustainable location that it is well linked to existing facilities and both active and public transport networks. It will:

1. Provide a modest scale of development for local people along with much needed affordable housing;
2. Support and enhance existing facilities and services through providing homes in an appropriate location;
3. Provide an opportunity to focus development in a sustainable location that is well served by public transport and within easy reach of a wide range of facilities, helping to create a move away from reliance upon the private car;
4. Capitalise on its location in close proximity to the canal to the north and the recreational benefits associated. The site's location, in proximity to a number of walkable local services, alongside proximity to Fourteen Locks, presents an opportunity to develop a residential scheme with an array of leisure and recreational offerings available within walking distance.
6. Provide enhanced facilities for the Children's centre in particular providing additional storage area and overspill car parking. It is noted that many of the users (parents and children along with

<p>specialist Doctors and Care Givers) cannot use public transport for various reasons and are reliant upon travelling to the Centre by car;</p> <p>7. Adopt an approach to design that reflects the traditional local character, density and appearance; and</p> <p>8. Make an appropriate use of a site that can be accommodated without harm to landscape or biodiversity but rather can formulate a strategy to help improve both. The illustrative masterplan includes landscape enhancements through a countryside green edge to the east and a vegetated buffer to the north. This will prevent impact on the existing uses and landscape features identified to the north of the site. Further, the parcel of land to the east of the site is demonstrated as benefitting from strategic woodland planting of native woodland and flowering fruit trees. Collectively, these enhancements seek to enhance the existing features of the natural landscape.</p>	
<p><b>Evidence Base</b> <b>EVIDENCE BASE:</b></p>	
<p><b>11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</b></p>	
<p>It is noted that only limited evidence is currently available and it is clear that there will be a need to publish significantly more evidence in respect of matters such as supply of housing land.</p>	<p>Noted</p>
<p><b>12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</b></p>	
<p>We have commented previously on the Objectives of the RLDP and reserve the right to comment further once the updated Objectives are consulted upon.</p> <p>For ease of reference, it is noted that in general terms we are supportive of the overall approach towards the objectives, however, we believe that particular attention is needed with regards to economic and population / community objectives. As we have stated earlier, there are significant challenges ahead and it must be the role of the planning process to help address these issues rather than constrain recovery and realignment.</p> <p>We are strongly of the view that well planned greenfield sites can contribute towards a range of the key objectives not just in respect of population and communities, inclusive of:</p> <ul style="list-style-type: none"> <li>-including a variety of housing types, tenures and densities;</li> <li>-providing a landscape structure that builds on existing assets, including green infrastructure within the development, linking urban areas to the countryside beyond and creating a distinctive edge to the urban area;</li> <li>-providing opportunities for people to work locally and for small businesses to set up, grow and thrive as well as providing homes for local workers;</li> <li>-addressing the challenges that exist in the aftermath of Brexit and Covid and ensure that Newport can embrace and facilitate new markets and technologies;</li> <li>-presenting an opportunity to design energy efficient communities; and</li> </ul>	<p>Noted. The Deposit Plan will include reviewed urban and village boundaries and green wedge designations.</p>

<p>-allowing pedestrian, cycle and public transport networks to be fully integrated, often improving services available to the adjacent communities, increasing health and well-being by reducing the reliance on cars.</p>	
<p><b>Other comments</b></p>	
<p>It is noted that our client is currently in the process of liaising with house builders and housing associations in respect of refining development proposals for the site. However, they would welcome engagement with the Council on whether they consider either site could play a role in the delivery of sustainable communities through the replacement LDP.</p>	<p>Noted.</p>

**GSO 031 – Bronafon Housing Association – 00706**

Question / Response	Officer Response
<p>We set out herein our client’s response to the Newport Local Development Plan (LDP) Growth and Spatial Options consultation paper. Our clients have an interest (or are in the process of establishing an interest) in a number of sites of various scales across Newport that they believe have the ability to provide sustainable and viable opportunities for meeting needs within the Authority</p> <p>It is noted that Bron Afon are a Registered Social Landlord (RSL) that have historically operated within Torfaen but in line with recent changes to the scope of RSL’s in Wales are looking to help meet local housing needs in adjoining Authorities. They control over 8,000 properties within Torfaen County Borough and have aspirations to deliver over 100 to 150 new dwellings per annum over the next five years and beyond across a range of Authorities of both social and private sales. In this regard, they are well placed to help Newport to deliver a sustainable and affordable supply of homes over the course of the period of the Replacement Plan.</p> <p>Our clients are pleased to have the opportunity to feed into the early stages of the plan preparation process and hope that their input is helpful in forming the key components of the Plan. Currently, our clients have an interest in a site at Castleton (Bakery Lane) that was submitted as a candidate site but are also at the early stages of liaising with other landowners that have submitted sites previously at Bettws, Rogerston, Basseleg and another site at Castleton with a view that they would contribute towards the delivery of the social housing element along with potential provision of private sales housing through their private sales arm which is in the process of being finalised. I with regards to Basseleg they have been in discussions with a number of landowners and option holders in the area with regards to a sustainable urban extension, a red line plan of this is included at appendix 1 for ease. Should the Council consider that this as a direction for growth Bron Afon and the other landowners would be happy to meet with the Council to discuss this area and how it can contribute towards the Plan.</p>	<p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site’s Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>

<p>The sites above are at varying stages in preparation of evidence but our clients would welcome discussions with the Council on each of the sites and the work that has been undertaken and would be required. Indeed, our clients would be keen to demonstrate the sites that they are working on would be deliverable, viable and sustainable such that they can provide a timetable for delivery to feed into the Council's trajectory both on terms of private and affordable homes. Our client's response to the Growth and Spatial Options consultation is set out below and is to be considered against their overarching role which is to assist the Authority in achieving the objectives of the LDP and the Future Wales aspiration for Newport to increase its Strategic Role in the region.</p>	
<p><b>Growth Options</b>  <b>GROWTH OPTIONS: Growth Scenarios –</b>  <b>1. Are there any scenarios that have been discounted which should be considered further, and why?</b></p>	
<p>We are strongly of the view that it is appropriate to discount the low growth options. In this regard, Policy 33 of Future Wales states that the Welsh Government support an "increased strategic role" however this cannot be a continuation of its existing role or approach towards growth and the benefits that it can bring, rather it requires enhanced levels of growth and investment. Table 1 provides a useful point of reference for establishing how an increased strategic role may be facilitated. Clearly in order to comply with Future Wales the Plan requires a level of growth that is at the very least equal to or greater than the current LDP level of growth, as such it can not be justified removing the PG Short Term level of growth. Whilst they are very similar, this along with the Dwelling Led 5yr level are the only two approaches that would seek a higher level of growth than is presently the case and therefore comply with Future Wales, all of the others would imply a reduced strategic role. Notwithstanding this, we accept the Council's reasons for discounting at this stage in order to avoid duplication of consideration. We set out the reasons for a higher level of growth in more detail in our answer to question 2 below.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><b>2. Which of the options do you feel is the most appropriate, and why?</b></p>	
<p>It is clear that the only two options that are appropriate, in line with Future Wales and an increased Strategic Role for Newport are those that are higher than the existing LDP level and in this regard we strongly believe that the Dwelling Led 5yr level is the most appropriate. It is clear that Future Wales anticipates Newport growing "in and immediately adjoining" the settlement and an increased strategic role for the city. As such it is key that an aspirational level of growth is sought that seeks to drive the increase the strategic role that Newport plays and drive the regional economy. We would note that Wales as a whole is facing its most significant challenges for some considerable time and it is without question the case that the Replacement LDP is being prepared under some of the most challenging societal and economic conditions since World War Two. There are numerous factors providing the context for the level of growth sought which we believe point towards the higher levels. We set these out summarily below but note their importance in a higher growth requirement.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

<p><u>Post Covid 19 recovery, energy crisis and Brexit</u></p> <p>It is clear that Newport faces significant challenges in order to achieve an increased strategic role in the context of the post Covid economy, Brexit Recovery and the ongoing energy crisis. Indeed, over recent years we have experienced exceptional circumstances that have the potential to severely and drastically impact upon the economy and society as a whole. We are strongly of the view that the planning process must play its part in helping to facilitate the economic recovery that is needed. Plainly economic recovery must form an over-riding requirement of the plan and without question must underlie the approach to be taken. An appropriate response to achieve an increased strategic role would be to plan for higher levels of growth than over recent plan periods.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><u>Constraints in adjoining Authorities</u></p> <p>In addition to meeting its own needs the Council will need to consider the lack of housing supply in neighbouring Authorities. Indeed, Future Wales is also clear that “Growth at Newport will help manage the development pressures in the region by providing a strategic growth focus for the eastern part of the area”. Newport has not just been dealing with its own needs in recent years and accordingly needs to consider the offsets from new homes not being provided in its neighbouring authorities. Whilst housing land supply requirements were formally abandoned by the Welsh Government, it does not change the record of poor delivery elsewhere and it follows logically that where needs aren’t met within an Authority, they will need to be accommodated somewhere. Whilst this is an unsatisfactory and unsustainable position there is unlikely to be any change in this in the short term. Indeed:</p> <ul style="list-style-type: none"> <li>- Torfaen &amp; Caerphilly – as of April 2021 there was a cumulative shortfall across the two Authorities of over 4,000 dwellings from the levels envisaged within their respective Local Development Plans. This represents the number of households that could not be provided in those respective Authorities. This is a shortfall of national significance that has a profound effect on house prices across the region; and</li> <li>- Monmouthshire – representations made by the Welsh Government on the Monmouthshire LDP would mean that further new housing allocations would not be needed in Monmouthshire. Given the additional constraints in Monmouthshire, including Phosphates, it is likely that demand will be displaced from Monmouthshire to adjoining Authorities.</li> </ul> <p>Plainly, policy and supply constraints in adjoining Authorities will have a significant impact upon Newport Council in respect of the housing market and affordability issues. This is a challenge that the LDP respond to with higher growth rates than previous years in order to achieve an increased strategic role.</p>	<p>Noted. NCC is supportive of cross council working and joint working and effectively tackling cross boundary issues.</p> <p>The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><u>Meeting needs</u></p> <p>It will be of utmost importance to ensure Newport establishes a level of growth that meets needs and does not exacerbate the existing supply constraints in South Wales, taking into consideration the shortfalls in adjoining Authorities alongside Newport’s own needs. Rather we are of the view that the</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

<p>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. In this regard it is noted that:</p> <ul style="list-style-type: none"> <li>- given the potential impacts of Covid 19 on the economy and society, there will be a need to adopt a highly ambitious strategy which provides far greater flexibility to respond to the crisis through added stimulation of the construction sector;</li> <li>- account should be taken in the baseline figures of the levels of sustainability and self containment that can be achieved through embracing working from home trends for those sectors where it is feasible. These are often the high added value jobs that are no longer tied to cities such as Bristol or Cardiff but can retain expenditure in the local area and encourage vibrant local areas; and</li> <li>- any requirement should ensure an appropriate level of flexibility for delivery indeed, it may be that a 20% flexibility allowance or greater provides an appropriate starting point. We will comment on this further when detailed information becomes available.</li> </ul>	
<p><u>Addressing affordability</u></p> <p>The Council's result in nearly achieving its affordable housing target for 2015-2020 is to be welcomed. However, the Council recognise that this is only a small proportion of the actual level of need. The latest Local Housing Market Assessment (LHMA) indicates that "as of the 31<sup>st</sup> March 2017 there were 6,838 households with active applications on the housing waiting list. In order to clear this backlog during the 5 year life of this LHMA we would need to allocate 1,368 units of accommodation each year". The final stated annual shortfall is 559 per annum which equates to 2,795 over the five year period. This is plainly a significant issue within the Authority which has no doubt been exacerbated by price increases that have been caused due to shortages of housing supply outside of the County. Our clients are of the view that the replacement LDP provides an opportunity to seek to address affordability in a meaningful and substantive way.</p>	Noted
<p><b>3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</b></p>	
<p>We have considered the assessment of each of the options and have commented where we believe that the assessment could be reviewed. Importantly, with regards to the lower growth options that are considered (options 2 to 6) in the first instance, we do not believe that these will contribute towards the Future Wales aim for Newport to have an increased Strategic Role in South Wales, this should form part of the assessment.</p>	Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.
<p><u>Option 1: 12,570 new homes and 12,945 jobs</u></p> <p>With regards to the higher growth option we have suggested that a number of the "colours" should be improved based on the potential for positive outcomes. Indeed, greater levels of investment in line with an Increased Strategic Role for Newport would have the potential to bring many significant benefits across the assessment areas.</p> <p>We are strongly of the view that this is the only option that would allow Newport to strive towards an increased Strategic Role in line with Future Wales.</p>	This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.

Our analysis is below.		
Economy & Employment	We support the overall conclusions of this assessment	
Population & Communities	We support the overall conclusions of this assessment	
Health & Well Being	We support the overall conclusions of this assessment	
Equality, Diversity and Inclusion	We support the overall conclusions of this assessment	
Transport & Movement	Newport has been identified as a location for growth within Future Wales specifically because it is a sustainable location for growth. Its communities are well connected to public transport and well served by facilities. The sites that Bron Afon have an interest in are all in sustainable locations in respect of both local facilities and public transport. We note that it is indicated that more opportunities for investment could be apparent under high scenarios, we believe that the Council's assessment should be more positive on this – indeed, higher levels of growth would enable a step change in investment and enhancement that could be a significant benefit. This should be re-assessed as green. Indeed, this is far more likely to be the case than for small scale, incremental and piecemeal infill development and ad-hoc brownfield sites.	
Natural Resources	We are surprised by the comments set out herein, it is noted that water consumption would increase for all options however, there are sustainable means of managing this. Much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts. New urban extensions can provide a means of softening urban edges through more appropriate landscape buffers, open space and interface with rural areas. We also support the notion that greater investment brings the potential for more sustainable lifestyles, as greater facilities would exist and as construction techniques evolve and progress. We are strongly of the view that with appropriate planning interventions, this could be at least an orange category if not green	
Biodiversity and Geodiversity	Again the categorisation red seems inappropriate (Option 5 and 6 are green) yet brownfield sites have equal (if not greater) chance of disturbing habitats and actually being unable to adequately mitigate. There is significant	

	opportunity to provide ecological enhancement and net gain from greenfield sites, this includes to Sites of Importance for Nature Conservations (SINCs).		
Historic Environment	We would note that each case would need to be dealt with based on its own merits, albeit there are more heritage assets (including Listed Buildings and Conservation Areas) within the urban area than there are in surrounding green fields.		
Landscape	As noted earlier much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts. New urban extensions can provide a means of softening urban edges through more appropriate landscape buffers, open space and interface with rural areas		
Climate change	With regards to Flooding, there are considerable issues for existing properties in Newport, growth means higher investment and the potential to contribute towards solving existing problems Increased investment in local facilities would mean potentially increasing sustainability. A higher growth strategy will actively prevent growth being dispersed. Indeed, low growth means that people would “jump” the green belt – leading to greater in commuting or travel to Bristol and Cardiff.		
<p>With regards to the remaining options, we note:  <u>Option 2: 9,450 new homes and 10,695 Jobs &amp; Option 3: 9,570 new homes and 8,640 jobs</u>  Given the similar scale of growth we consider both options in the following table in order to minimise duplication. It is noted in the first instance that these would be contrary to the Future Wales aspiration for Newport to achieve an increased strategic role</p>		<p>This assessment was produce for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.</p>	
Economy & Employment	We support the overall conclusions of this assessment		
Population & Communities	We support the overall conclusions of this assessment		
Health & Well Being	We support the overall conclusions of this assessment		
Equality, Diversity and Inclusion	We support the overall conclusions of this assessment		
Transport & Movement	We support the overall conclusions of this assessment		
Natural Resources	As with option 1, we are surprised by the comments set out herein, it is noted that water consumption would increase for all options however, there are sustainable means of managing this. In addition, much of the landscape		



	surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts. New urban extensions can provide a means of softening urban edges through more appropriate landscape buffers, open space and interface with rural areas. We also support the notion that greater investment brings the potential for more sustainable lifestyles, as greater facilities would exist and as construction techniques evolve and progress. We are strongly of the view that with appropriate planning interventions, this could be at least an orange category if not green.		
Biodiversity and Geodiversity	Again the categorisation seems inappropriate (Option 5 and 6 are green) yet brownfield sites have equal (if not greater) chance of disturbing habitats and actually being unable to adequately mitigate. There is significant opportunity to provide ecological enhancement and net gain from greenfield sites, this includes to SINCs and Special Areas of Conservation (SACs)		
Historic Environment	It is unclear why options 2 and 3 are scored differently. We would note that each case would need to be dealt with based on its own merits, albeit there are more heritage assets (including Listed Buildings and Conservation Areas) within the urban area than there are in surrounding greenfield.		
Landscape	We support the overall conclusions of this assessment		
Climate change	With regards to flooding, there are considerable issues for existing properties in Newport, growth means higher investment and the potential to contribute towards solving existing problems. Increased investment in local facilities would mean potentially increasing sustainability. A higher growth strategy will actively prevent growth being dispersed. Indeed, low growth means that people would “jump” the green belt – leading to greater in commuting or travel to Bristol and Cardiff.		
<p>Option 4: 7,950 new homes and 9,405 Jobs, Option 5: 8,100 new homes and 6,720 jobs &amp; Option 6: 7,605 new homes and 5,835 jobs</p> <p>Given that Options 4, 5 and 6 and low growth options with broadly similar levels of new homes, we set out our combined comments on these options below in order to avoid duplication. It is noted in the first instance that these would be contrary to the Future Wales aspiration for Newport to achieve an increased strategic role.</p>			This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.
Economy & Employment	We are of the view that these low growth options should all be categorised as red as they would not provide the combination of jobs and homes required to provide an increased strategic role for Newport		

Population & Communities	We are of the view that these low growth options should all be categorised as red as they would not provide the combination of jobs and homes required to provide an increased strategic role for Newport		
Health & Well Being	At the lower scales of growth these options are unlikely to provide the investment required in such facilities rather it would be a continuation of existing levels.		
Equality, Diversity and Inclusion	We support the overall conclusions of this assessment however, question whether this should be red given the importance of meeting needs.		
Transport & Movement	With each option there would be fewer opportunities for significant levels of investment in improved infrastructure or sustainable means of travel		
Natural Resources	It is clear that lower growth levels would require less greenfield land which would clearly result in a continuation of the existing urban / rural interface. However, there are areas that could benefit from new landscaping / planting to soften the interface and provide visual benefits in this regard.		
Biodiversity and Geodiversity	The categorisation seems in appropriate and it is unclear why options 5 and 6 are green yet brownfield sites have equal (if not greater) chance of disturbing habitats and actually being unable to adequately mitigate due to more limited land availability on site. They do not have the same level of opportunity to provide ecological enhancement and net gain as greenfield sites, this includes to SINC's and SAC's.		
Historic Environment	We would note that each case would need to be dealt with based on its own merits, albeit there are more heritage assets (including Listed Buildings and Conservation Areas) within the urban area than there are in surrounding greenfield.		
Landscape	It is clear that lower growth levels would require less greenfield land which would clearly result in a continuation of the existing urban / rural interface. However, there are areas that could benefit from new landscaping / planting to soften the interface and provide visual benefits in this regard.		
Climate change	With regards to Flooding, there are considerable issues for existing properties in Newport, growth means higher investment and the potential to contribute towards solving existing problems There would potentially be less investment in sustainability. Lower growth is likely to contribute towards increased commuting whereby people would be priced out of the local market and "jump" the greenbelt to alternative locations where homes are available.		

**Employment Land Options**

<b>EMPLOYMENT LAND OPTIONS:</b>	
<b>Recommendation One -</b>	
<b>4. Is this requirement appropriate for Newport?</b>	
We are supportive of the recommendations of the Employment Land Review which seek to protect 157.8 ha of supply in order to achieve the 77ha requirement. We believe that this approach provides flexibility to achieve the Future Wales approach towards increasing the Strategic Role of Newport.	Noted
<b>5. Should it be different and if so, why?</b>	
As noted above, we support the recommendations of the Employment Land Review. Recommendation Two -	Noted
<b>6. Should some sites be removed from the employment supply? Why?</b>	
The Employment Land Review recommends that all the sites listed in Table E1 of the Executive Summary are retained within the RLDP, this includes both the Solutia Site and Queensway Meadows, therefore it is unclear why their removal is being considered, further clarity over this would be required in order for us to consider further. It is noted that if Newport is to achieve its increased Strategic Role, it is imperative that it is providing a balance of jobs and homes and a significant supply of deliverable land for both purposes is available.	Noted. The Employment Land Review (NB not executive summary) discusses this in more detail, including the recommendations regarding East of Queensway Meadows at section 8.8.
<b>7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.</b>	
Given our response to question 6, we have no further comments on this question	Noted
<b>Spatial Options</b>	
<b>SPATIAL OPTIONS:</b>	
<b>8. Which of these options do you feel is the most appropriate, and why?</b>	
We consider that the urban expansion option provides the most appropriate solution, this is framed on our approach towards growth which is based on the higher growth option (1) being the only approach that would be in compliance with Future Wales (i.e. an increased strategic role for Newport). For this reason we believe that the previously developed land (PDL) approach and Village Focus approaches should both be ruled out at this stage.	Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.
<u>Urban Expansion &amp; Hybrid Options</u> We note that there are various overlaps between the Urban Expansion and Hybrid Options, and we consider them jointly in the below table given the similarities. Indeed, we believe that given the lack of large suitable previously developed sites that may be available as new allocations, the PDL element is likely to be comprised of those existing allocations that are proven to be deliverable and capable of being rolled over alongside a small scale windfall assumption. As such with both options the amount of greenfield expansion land is likely to be similar given the scale of growth required in order to meet the strategic role of the City. However, we note that in respect of villages, it is likely to only be appropriate to consider small scale development parcels to meet local needs, rather than any significant scale of expansion.	This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.

Our comments in respect of the assessment of both is set out below.		
Economy & Employment	<p>Future Wales is clear that growth should be in and around Newport. As such, this approach would clearly be in line with the policy hierarchy. It is noted that over recent years there has been a concentration of development in the east of the City, there would be an opportunity with urban expansion to re focus on the west, north west and north of the City.</p> <p>We are strongly of the view that this should be green for both the Urban Expansion option and the Hybrid Option.</p>	
Population & Communities	We support the overall conclusions of this assessment with respect to Urban Expansion and believe that the same conclusions could be drawn from the Hybrid Option due to the fact that a similar quantum of greenfield development will be required in both scenario	
Health & Well Being	We support the overall conclusions of this assessment with respect to the Hybrid Option but believe that the same conclusions could be drawn from the Hybrid Option due to the fact that a similar quantum of greenfield development will be required in both scenario.	
Equality, Diversity and Inclusion	We support believe that for both Urban Expansion and Hybrid Options, the assessment should be green. Indeed, both will facilitate significant opportunities for improvements and this should not be down played	
Transport & Movement	Newport has been identified as a location for growth within Future Wales specifically because it is a sustainable location for growth. Its communities are well connected to public transport and well served by facilities. We note that it is indicated that more opportunities for investment could be apparent under high scenarios, we believe that the Council's assessment should be more positive on this indeed, higher levels of growth would enable a step change in investment and enhancement that could be a significant benefit. This should be re assessed as green. Indeed, this is far more likely to be the case than for small scale, incremental and piecemeal infill development and ad hoc brownfield sites.	
Natural Resources	We are surprised by the comments set out herein, it is noted that water consumption would increase for all options however, there are sustainable means of managing this. Much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts. New urban extensions can provide a means of	

	softening urban edges through more appropriate landscape buffers, open space and interface with rural areas. We also support the notion that greater investment brings the potential for more sustainable lifestyles, as greater facilities would exist and as construction techniques evolve and progress. We are strongly of the view that with appropriate planning interventions, this could be at least an orange category if not green.		
Biodiversity and Geodiversity	Again the categorisation seems inappropriate yet brownfield sites have equal (if not greater) chance of disturbing habitats and actually being unable to adequately mitigate. There is significant opportunity to provide ecological enhancement and net gain from greenfield sites, this includes to SINCS.		
Historic Environment	We would note that each case would need to be dealt with based on its own merits, albeit there are more heritage assets (including Listed Buildings and Conservation Areas) within the urban area than there are in surrounding green fields. Sites within our client's control would have no impacts on heritage assets.		
Landscape	As noted earlier much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts. New urban extensions can provide a means of softening urban edges through more appropriate landscape buffers, open space and interface with rural areas.		
Climate change	With regards to Flooding, there are considerable issues for existing properties in Newport, growth means higher investment and the potential to contribute towards solving existing problems. As such, sites such as our clients where flooding is not a constraint but are in sustainable locations form a solution to this and cannot be considered negative. Increased investment in local facilities would mean potentially increasing sustainability. Appropriate levels of growth being identified would prevent growth being dispersed across numerous local authorities which has happened over recent years due to supply constraints. Low growth means that people would "jump" the green belt leading to greater in commuting or travel to Bristol and Cardiff.		
<b>10. Are there any other matters that should be given consideration when assessing these?</b>			
In supporting our assessment of both the highest growth option and spatial approach which requires greenfield land, we set out below a number of key considerations in the benefits that they can bring. In			Noted

<p>particular in helping Newport to achieve and increased strategic role but also in terms of the other key assessment areas.</p>	
<p><u>Sustainable urban extensions</u>  Our clients are of the view that it will be important to consider all scales of potential development from minor rounding off of settlements and infill to sustainable urban extensions in line with Future Wales. Indeed, the Welsh Government's guidance, "Building Better Places" actively seeks to achieve rounded communities based on the underlying principles of place making.  The Town and Country Planning Association (TCPA) indicates that the full range of planning solutions should be available to communities in order to achieve "the most sustainable pattern of development locally". Guidance set out by the TCPA indicates that holistically planned urban extensions can enhance the natural environment and offer high-quality affordable housing and locally accessible work in beautiful, healthy and sociable communities. Such interventions could be exemplars in sustainability and energy efficiency.  The TCPA also note that "Major planned developments such as ....urban extensions provide an opportunity to design-in the greenest of technologies and infrastructure from scratch, in ways that are not possible in smaller infill schemes". Such schemes can set a benchmark in quality and approach that can lead the way for smaller schemes elsewhere in the country.  Appropriately sized and scaled urban extensions provide the opportunity for new development to positively address existing issues by creating a planned environment to suit and cater for a critical mass of population, services and facilities. These can:  -include a variety of housing types, tenures and densities along with neighbourhood centres with mixed uses and a range of facilities;  -provide a landscape structure that builds on existing assets, including green infrastructure within the development, linking urban areas to the countryside beyond and creating a distinctive edge to the urban area;  -provide opportunities for people to work locally and for small businesses to set up, grow and thrive;  -present an opportunity to design energy efficient communities;  -allow pedestrian, cycle and public transport networks to be fully integrated, often improving services available to the adjacent communities, increasing health and well-being by reducing the reliance on cars;  and  -support the surrounding communities by offering facilities not available locally and by providing affordable housing for people in the care and support sectors they can ensure that the elderly can continue to live independently amongst friends and family reducing the costs of providing social and nursing care.</p>	<p>Noted. The Deposit Plan will include reviewed urban and village boundaries.</p>

<p>These concepts are best delivered through consideration of longer term time horizons and wider geographical areas so that the benefits of strategic solutions are explored. The alternative of short term, small scale, incremental and dispersed change will not yield the same overall benefits. Importantly, by applying a coherent and distinctive urban design concept and master planned approach that combines innovative solutions and reflection of local characteristics, such extensions can provide the opportunity to create a new development that has a strong local identity. This will facilitate effective integration with the existing community for whom there should be major benefits particularly in relation to supporting the existing economy and creating jobs but also in the provision of a range of housing sizes, styles and tenures to accommodate those currently priced out of the local housing market. This accords with a wide range of national planning policy requirements.</p>	
<p><u>Sustainable growth locations</u> It is inevitably the case that the supply of brownfield sites in Newport for redevelopment for residential purposes is limited. As such, the Council will need to consider sustainable and appropriate greenfield locations based around existing communities. In reality, this is likely to focus on the western and north western parts of the County extents associated with existing built form and communities. Indeed, we are of the view that the LDP must not neglect the requirements of these existing communities in favour of more remote areas on the Eastern side of the City that would be more aligned to commuting patterns along the M4. It is anticipated that such focal points for proportionate growth include a number of existing communities where there are a number of local facilities that can provide an opportunity to maximise levels of self-containment and sustainability. Indeed, proportionate growth can help to reinforce existing levels of sustainability but also seek to provide additional facilities and uses that can move to a greater level of neighbourhood and community well-being. In this regard, our clients consider that Bettws and Rogerstone are suitable locations to accommodate further sustainable growth.</p>	<p>Noted. The Deposit Plan will include reviewed urban and village boundaries.</p>
<p><u>Bettws</u> Bron Afon consider that the community will benefit from the significant investment and opportunities that an extension located at Bettws would bring. Indeed, Bettws is itself a sustainability community with a range of shops, schools and facilities and is very well served by public transport. However, it is in need of investment and opportunities in order to help reduce localised inequalities, there is a significant opportunity to increase the level of self-containment of Bettws through providing new homes and other land uses that could add to the level of local facilities. Bettws is very well served by regular bus routes, typically 20 minute frequency, to and from Newport running along Monnow Way. In addition, the canal towpath offers an easy and pleasant foot/cycle path route into the City centre approx. 4km distant. In the centre of Bettws there are a number of local shops, including Spar shop, post office, newsagent and hairdresser as well as several denominations of church, a library, a health centre, chemist, dental</p>	<p>The Deposit Plan will include reviewed urban and village boundaries.</p>

<p>surgery alongside Monnow Primary School and Newport High School. Bettws also has a number of sports grounds, playing fields and a leisure centre (active living centre associated with the High School). Bettws is visually very well contained both physically and visually. It is not widely visible and in the limited local views in which it features it is seen in the context of the built up area of Bettws. It is therefore considered that it should form an area of search for a suitable urban extension.</p>	
<p><u>Castleton</u>  Castleton is a very sustainable local settlement located partway between the Cities of Newport and Cardiff. It provides a range of existing facilities and is considered to be highly appropriate for proportionate small scale extensions and infill development in order to help provide affordable homes. Indeed, there is considered to be a significant need for more affordable properties to help ensure a more balanced community.  It is notable there is a wide range of local services and facilities that would ensure it is a suitable location for additional provision of homes:  -Castleton and District Village Hall  -Marshfield Primary School  -Castleton Baptist Church Fellowship  -Petrol Station  -Convenience Store  -Motor Vehicle Garage  -Premier Inn Hotel  -Coach and Horses Restaurant and Pub  Furthermore, it is located along sustainable public transport routes with bus stops run along Marshfield Road. These stops serve bus route 30, which operates between Cardiff and Newport via Old St Mellons, Castleton and Tredegar Park. This provides 28 services per day between Monday and Friday, 26 services on Saturdays and 10 services on Sundays.  Summarily, it is clear that at the local scale a general level of self containment and walking can be achieved and more strategically it is well placed in respect of public transport routes. Small scale expansion with proportionate affordable homes that do not impact upon landscape constraints (in particular coalescence with Cardiff) should be explored and encouraged.</p>	<p>The Deposit Plan will include reviewed urban and village boundaries.</p>
<p><u>Bassaleg</u>  Bassaleg is a very well established and popular area of Newport with a wide range of local facilities and services. It is considered an appropriate focal point in order to consider strategic growth to reinforce and strengthen levels of sustainability.  Indeed in terms of existing facilities, alongside the education provision there is a convenience store, post office, allotments, public open space, children's play area and the village hall.</p>	<p>The Deposit Plan will include reviewed urban and village boundaries.</p>



<p>There are numerous bus services that operate along the A468 Caerphilly Road providing links to both local areas as well as an inter urban bus service providing access to Newport, Caerphilly, Ystrad Mynach, Cardiff and Bargoed.</p> <p>The train service from Pye Corner to Cardiff Ebbw Vale is 1.8km away. The station is located on the proposed integrated route network that runs along Park View and can connect to the existing active travel route. There is car parking at the station. It is considered an appropriate location for the provision of strategic growth that would compliment existing facilities provide more opportunities for local people to remain in the area.</p>	
<p><u>Rhiwderin</u></p> <p>Rhiwderin is a sustainable local community has a range of facilities including a community centre, a newsagent, post office, place of worship and a public house. In addition, it is within a reasonable walking and cycling distance to Pentrepoeth Primary School and Bassaleg Secondary School.</p> <p>In addition there are regular bus services close providing links to Newport City Centre as well as other inter urban bus services to surrounding towns including Caerphilly, Ystrad Mynach, Bargoed and Cardiff.</p>	<p>The Deposit Plan will include reviewed urban and village boundaries.</p>
<p><u>Rogerstone</u></p> <p>Bron Afon consider that sites within easy walking distance of Rogerstone Railway Station which is one of the few South Wales Metro -rail connections within Newport's administrative area - should act as a focal point around which new development should be encouraged. Indeed, this links to Cardiff, Ebbw Vale, and beyond (to Swansea, Bristol, London and the Midlands). Furthermore, regular bus services run along Risca Road providing links between Newport and Risca/Pontymister as well as between Newport and Blackwood.</p> <p>There exists a wide range of facilities locally including supermarkets at Afon Village and Pontymister/Risca, a post office, various shops, restaurants, places of worship and employment areas such as the Wern, Tregwilym and Pontymister industrial / trading estates as well as Cleppa Business Park. Rogerstone Primary School, Jubilee Park and Mount Pleasant Primary Schools and Bassaleg Secondary School;</p> <p>It is considered an appropriate location for the provision of proportionate growth that would compliment existing facilities provide more opportunities for local people to remain in the area.</p>	<p>The Deposit Plan will include reviewed urban and village boundaries.</p>
<p><b>Evidence Base</b></p> <p><b>EVIDENCE BASE:</b></p> <p><b>11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</b></p>	
<p>It is noted that only limited evidence is currently available and it is clear that there will be a need to publish significantly more evidence in respect of matters such as supply of housing land. It is noted that</p>	<p>Noted</p>
<p><b>12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</b></p>	

<p>We have commented previously on the Objectives of the RLDP and reserve the right to comment further once the updated Objectives are consulted upon.</p> <p>For ease of reference, it is noted that in general terms we are supportive of the overall approach towards the objectives, however, we believe that particular attention is needed with regards to economic and population / community objectives. As we have stated earlier, there are significant challenges ahead and it must be the role of the planning process to help address these issues rather than constrain recovery and realignment.</p> <p>We are strongly of the view that well planned urban extensions can contribute towards a range of the key objectives not just in respect of population and communities, inclusive of:</p> <ul style="list-style-type: none"> <li>-including a variety of housing types, tenures and densities along with neighbourhood centres with mixed uses and a range of facilities;</li> <li>-providing a landscape structure that builds on existing assets, including green infrastructure within the development, linking urban areas to the countryside beyond and creating a distinctive edge to the urban area;</li> <li>-providing opportunities for people to work locally and for small businesses to set up, grow and thrive;</li> <li>-presenting an opportunity to design energy efficient communities;</li> <li>-allowing pedestrian, cycle and public transport networks to be fully integrated, often improving services available to the adjacent communities, increasing health and well-being by reducing the reliance on cars; and</li> <li>-supporting the surrounding communities by offering facilities not available locally and by providing affordable housing for people in the care and support sectors they can ensure that the elderly can continue to live independently amongst friends and family reducing the costs of providing social and nursing care</li> </ul>	<p>Noted. The Deposit Plan will include reviewed urban and village boundaries.</p>
<p><b>Other comments</b></p>	
<p>It is noted that our client is currently in the process of liaising with house builders and housing associations in respect of refining development proposals for their sites. However, they would welcome engagement with the Council on whether they consider either site could play a role in the delivery of sustainable communities through the replacement LDP.</p>	<p>Noted</p>

**GSO 032 - RPS Consulting Services Ltd - 00853**

Question / Response	Officer Response
<p><b>GROWTH OPTIONS:</b>  <b>Growth Scenarios -</b>  <b>1. Are there any scenarios that have been discounted which should be considered further, and why?</b>  <b>2. Which of the options do you feel is the most appropriate, and why?</b></p>	

<b>Assessment of Growth Options Against RLDP Objectives -</b>	
<b>3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</b>	
<p>1. There are no scenarios that have been discounted that should be considered further.</p> <p>2. The higher housing growth scenarios published in the growth and spatial options paper accurately reflect that the RLDP has to conform with the Future Wales' spatial strategy. The RLDP should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure. Option 1 (Dwelling-led SYR) is the most appropriate of the growth scenarios to fulfil Future Wales. The Welsh Government is determined to see development and growth in Newport, allowing the city to fulfil its potential as a second focal point for the region. Highly skilled employment opportunities in the transport and digital communications sectors should be catalysts for further economic investments. Option 1 proposes the highest amount of dwellings across the local authority. This is essential to enhance Newport's economic role. The Dwelling-led 5YR scenario has a higher but realistic population change than Option 2 WG-2018-HIGHPOP. This is the step change necessary to achieve the National Plan. Option 1 is the only option with housing supply above the current LDP strategy, therefore, reflecting Newport's focus for growth role established by the Future Wales National Plan 2040.</p> <p>3. Option 1 will overall bring a neutral contribution to the RLDP objectives; population and communities, health and wellbeing, equality, diversion and inclusion and transport and movement. The risk of not achieving a step change for the City and delivery of growth as envisaged in Future Wales should be a matter for consideration when assessing the scenarios. To de- risk the plan the Preferred Strategy should be based upon a robust assessment of the capacity to deliver Option 1. Delivery and viability should be embedded in the next stages of the candidate site process. An adequate flexibility allowance should be applied to de- risk the plan. The preferred strategy should be based on an objective assessment of the role and function of places within Newport in line with the search sequence and National Sustainable Placemaking Outcomes, as set out in PPW. This will create inclusive, connected, adaptable and accessible communities that are cohesive and ensure Newport's potential is realised.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><b>EMPLOYMENT LAND OPTIONS:</b></p> <p><b>Recommendation One -</b></p> <p><b>4. Is this requirement appropriate for Newport?</b></p> <p><b>5. Should it be different and if so, why?</b></p> <p><b>Recommendation Two -</b></p> <p><b>6. Should some sites be removed from the employment supply? Why?</b></p> <p><b>7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this</b></p>	

<p>4. Recommendation 1 is the minimum requirement to fulfil the expectations of Future Wales for Newport to be the focus for strategic economic growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure.</p> <p>5. Yes, it should probably be different. If the supply to match the requirement is to include the sites identified in the ELR the requirement should be higher. Excluding land East of the Queensway the supply amounts to just over 90 hectares. However, just over 40 hectares is ring fenced for the expansion of Eastman (Solutia). It cannot be considered as readily available to meet the broader employment land requirement to fulfil the growth strategy. Furthermore, the ELR assesses the Accessibility, Environmental Factors and Market Attractiveness of nine sites (includes East of Queensway). Three sites are considered to score highly, amounting to just under 48 hectares. The requirement should be for 77 hectares of readily available, accessible, and attractive employment land. Given a site is ring fenced for Eastman (Solutia) the requirement should be for 117 hectares.</p> <p>6. Given the need to fulfil the local and sub regional (CCR) employment sites, other than land East of Queensway, should not be removed from the employment land supply.</p> <p>7. TAN 23: Economic Development and PPW state that an existing employment site should only be released for other uses if other priorities, such as housing need overrides more narrowly focused economic considerations. The economic considerations are of national significance as per the growth strategy (Future Wales).</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><b>Spatial Options</b></p> <p><b>8. Which of these options do you feel is the most appropriate, and why?</b></p> <p><b>9. Are there any other spatial distributions that should be considered, and if so, why?</b></p> <p><b>10. Are there any other matters that should be given consideration when assessing these?</b></p>	
<p>8. With regard to spatial options, a hybrid approach is favoured with a mixture of previously developed land, sites on the edge of the urban boundary and sites at surrounding existing villages. Where there is a need for sites and there is no previously developed land or underutilised sites, consideration can be given to suitable and sustainable greenfield sites within or on the edge of settlements. A balance of previously developed land, sites on the edge of the urban boundary and sites at surrounding existing villages will ensure a range of locations and size of sites. A range of sites de risks the delivery of the RLDP. The hybrid approach scores highly against the RLDP objectives for Economy and Employment, health and wellbeing and biodiversity and geodiversity. Under the hybrid approach or urban expansion option, land at Glochwen, Rhiwderin is immediately adjacent to the existing urban area. Taking into account designations and the characteristics of the site some 160 dwellings could be accommodated. The currently freight only railway line runs through Rhiwderin.</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.</p> <p>The Deposit Plan will include a review of the urban and village boundaries. The Settlement Assessment Background Paper provides a village appraisal.</p>

<p>Rhiwderin is well established location within the existing urban area. There is access to existing services and facilities within the area including schools, convenience retail, community buildings, active travel routes, bus and train services both providing direct links to the city centre. Development at West Newport is well placed to support the ongoing regeneration of the city centre.</p> <p>PPW is clear due to their strategic nature Green Belts will have significance beyond a single local authority and they should only be proposed as part of either a Joint LDP, an SDP or Future Wales. The green belt needs to be balanced with placemaking potential and achieving the growth strategy as per Future Wales. The national plan envisages strategic growth should be focused in and immediately adjoining Newport itself.</p> <p>9. The four spatial distributions provided cover the full range of options from urban to rural land use for development, with the addition of a mixture of both.</p> <p>10. The hybrid option scores favourably as per the assessment of spatial options. To de risk the delivery of the plan as per the LDP Manual 3 a further matter for consideration is the delivery risk associated with each of the spatial options. The hybrid option is low risk. Furthermore, development at West Newport has excellent linkages to the city centre and employment at Celtic Springs, Cleppa Park and Imperial Park. The site at Glochwen, Rhiwderin could possibly include a direct active travel route to Jubilee Park residential estate and school as well as further to Pye Corner</p>	
<p><b>Evidence Base</b></p> <p><b>11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</b></p> <p><b>12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</b></p>	
<p>11. The current evidence base used to inform the development of the preferred growth and spatial options strategies is sufficient and critically encapsulates Newport as a growth in National planning policy.</p> <p>12. It is important that the RLDP takes a pragmatic approach and provides a good balance between housing and employment growth opportunity. There needs to be a strong focus on those identified areas for growth in the paper. A good range of different house types and tenures in a range of locations should be supported through the RLDP, taking advantage of available land on the edge of Newport to help to deliver an appropriate scale of growth for the City.</p>	<p>Noted</p>
<p><b>Other Comments</b></p>	
<p>Whilst historically Rhiwderin is classed as a village, it has evidently accommodated urban extension growth. The location benefits from the services and facilities provided in the Bassaleg/Rhiwderin area</p>	<p>The Deposit Plan will include a review of the urban and village boundaries.</p>

GSO 033 - Beechurst Homes Ltd - 00646

<p><b>Growth Options</b> <b>Growth Scenarios –</b></p>
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**1. Are there any scenarios that have been discounted which should be considered further, and why?**

**2. Which of the options do you feel is the most appropriate, and why?**

**Assessment of Growth Options Against RLDP Objectives –**

**3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?**

Background

Chapter 3 of the Growth and Spatial Options paper presents and seeks feedback on a series of growth scenarios which would, in turn, inform the housing requirement and the number of jobs to be planned for (which would inform the employment land requirement) in the Replacement Local Development Plan ("RLDP") with a plan period of 2021-2036. Initially, 12 scenarios are presented in Table 1 (page 12) with Table 2 (page 13) refining this down to six Growth Options as the employment-led scenarios. The scenarios that would result in low levels of growth have been removed as they do not align to Future Wales - The National Plan 2040 (February 2021) vision for Newport as a National Growth Area. For context, and as you will be aware, Beechurst Homes Limited submitted representations in support of the Land to the North of Christchurch Hill, Christchurch in August 2021. Given Beechurst Homes Limited's land interests within Newport, the Growth and Spatial Options paper is only relevant in so much as it informs the housing requirement. As a result, matters relating to the number of jobs to be planned (and the associated employment land requirement) are not relevant.

Context

Planning Policy Wales (Edition 11, February 2021) is clear as to how a housing requirement should be formulated. Paragraph 4.2.6 states: "The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans. These should be considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also be given to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities."

From the above it is clear that:

1. Household projections should be used as the starting point for establishing the housing requirement;
2. But that other elements of the evidence base should also underpin the housing requirement; and
3. The wider political, economic, social and environmental context, combined with what the Local Planning Authority (LPA) want the Replacement Local Development Plan (RLDP) to achieve, should be considered.

These matters are discussed in turn below.

Noted. Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.

<p><u>1. Household projections</u></p> <p>Beechurst Homes Limited suggest that the correct projection to use is the WG-2019-HIGHPOP (Growth Option 2 from Table 2 (page 13)). The reason for this suggestion is that, unlike the WG-2018-Principal or the WG-2018-LOWPOP projections, it is re-based to the 2021 census. This is the right starting point because it utilises the most recent set of household projections (2018 based) whilst responding to the actual findings of the 2021 census which provide a more recent, and therefore reliable, snapshot in time than the 2018-based projections. In other words, these projections reflect the actual 'position on the ground', and the projections associated with it, at a fixed point in time rather than a wholly projected scenario.</p> <p>This is particularly important in the case of Newport City Council (NCC) where there is a significant under estimation of the position compared to the actual findings of the 2021 census. This is articulated in the 'LDP Demographics' Paper prepared by Edge Analytics on behalf of NCC. Paragraph 2.25 states: "Newport has seen the largest population increase between the 2020 MYE and 2021 census population compared to other Welsh authorities (2.0%) (Figure 20). Only two out of the 22 Welsh authorities have seen an increase between the two population figures (Powys and Newport), with the rest of the authorities showing population declines".</p> <p>Taking the above together, it is particularly important for an LPA such as NCC where there is a significant diversion between the 2018-based projections and the 2021 census to use the WG-2018-HIGHPOP.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><u>2. Evidence base</u></p> <p>Two of the options presented in Table 1 of the Growth and Spatial Options paper are the PG-Short Term and PG-Long Term scenarios (the PG-Long Term is also presented as Option 5 in Table 2). These scenarios use the ONS 2020 Mid-Year Estimate and then calibrate either to assume migration rates over the last five years (in the case of the PG-Short Term) or 19 years (PG- Long Term). The below table has been put together using the ONS 'Local Area Migration Indicators' dataset from September 2021 and shows the net balance of inflow and outflow over the last ten years to and from Newport from other parts of the UK. In this case, it is calculated by subtracting the number of people that leave NCC to move to another local authority from the number of people that move to NCC from another local authority:</p> <p>Year Net Internal Inflow</p> <p>2010-2011 90</p> <p>2011-2012 -197</p> <p>2012-2013 -357</p> <p>2013-2014 -485</p> <p>2014-2015 -11</p> <p>2015-2016 271</p> <p>2016-2017 1,098</p> <p>2017-2018 1,211</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers. To be passed to Edge for further consideration.</p>

<p>2018-2019 445 2019-2020 1,118</p> <p>The table shows a changing balance over the last 10 years, from a period where there was a net outflow of people from Newport to a situation since 2015-2016 where there has been a sustained and significant net inflow of people from Newport. Assuming a household size of 2.3 people, the net inflow would represent an additional 486 homes per annum for 2019/2020. The 2018/2019 figure is an anomaly as a result of COVID-19 - something that is recognised in Paragraph 2.15 of the 'LDP Demographics Paper'. The 'LDP Demographics' Paper prepared by Edge Analytics explains why it is the case that there has been a net inflow since 2015/2016 at paragraph 2.14 which states: "Likely factors driving this increase include the rate at which new homes have been built, the removal of the Severn Bridge toll in 2018 and the introduction of ONS' Higher Education Leavers Methodology (HELM)."</p> <p>The fact that the greatest inflow is from Bristol, North Somerset and South Gloucestershire (Figures 14 and 15 of the LDP Demographics Paper) helps to confirm this conclusion. The position with regards to the Severn Bridge tolls is fixed - the tolls have been removed and there is no indication of them being re-introduced. There is, therefore, no structural reason as to why the net inflow of people would reverse in coming years.</p> <p>Beechurst Homes Limited do not suggest it would be the right approach for either of the PG to be chosen as growth option as ultimately they look at previous trends rather than future projections to come over the RLDP plan period, but it is clear that the level of UK based migration is such that a significant uplift on the selected demographic scenario should be applied and that this should be based on a PG option that considers the level of net internal migration over the last four years since the tolls have been removed (excluding the year affected by the COVID-19 pandemic) rather than a longer time window such is the material difference caused by the Severn Bridge tolls being removed. This should be applied as a "multiplier" on top of Growth Option 2.</p>	
<p>3. <u>Wider political, economic, social and environmental context</u></p> <p>The Growth and Spatial Options paper sets out how Newport should be seen in the context of the wider South East Wales region in Future Wales - The National Plan 2040 (February 2021). The development plan status of Future Wales and what it means for Newport is discussed in Section 2.1 of the Growth and Spatial Options paper. While repeating information contained in the document is unnecessary, it is evident from Policy 33 (National Growth Areas - Cardiff, Newport and the Valleys) that Newport should:</p> <ul style="list-style-type: none"> <li>• Have an increased strategic role for sustainable long-term growth;</li> <li>• Be a growth pole for new housing in the eastern part of South Wales; and ;</li> <li>• Work alongside neighbouring authorities (both in South Wales and England) to achieve this.</li> </ul> <p>The implications of this are that any Growth Option selected must be aspirational. This is recognised in Section 3.1 of the Growth and Spatial Options document which, on page 12, explains that a number of</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>



<p>the options suggested in Table 1 have been dismissed due to their low scale of growth not being in conformity with Future Wales.</p> <p>The status of Newport in Future Wales provides further justification for WG-2018-HIGHPOP (Growth Option 2) as a starting point given that it is aspirational in nature whilst the encouragement to work with neighbouring local authorities suggests that net inflow into Newport from neighbouring authorities should be welcomed and planned for through the incorporation of a PG scenario.</p>	
<p><u>Assessment of Growth Options against RLDP objectives</u></p> <p>Appendix A of the Growth and Spatial Options paper provides an appraisal of the performance of the six Growth Options against the 10 RLDP Objectives, in essence creating a matrix that allows for comparison between the various options. This is built upon further in Appendix A of the document.</p> <p>Beechurst Homes Limited's concern is that the assessment undertaken as part of Table 3 and in Appendix A assumes that a certain Growth Option will have an 'Amber' or even 'Red' impact when the selection of appropriate sites which are environmentally and technically acceptable (or incorporate appropriate mitigation, compensation and enhancement to achieve this) can mean that they can be delivered without a negative impact (i.e. with a 'Green' or, at worst, 'Amber' impact).</p> <p>In this sense, it is essential to stress that the submission made by Beechurst Homes Limited (relating to land to the North of Christchurch Hill, Christchurch) as part of the Call for Candidate sites represents an opportunity which could be delivered in a way which is technically and environmentally sound. For context, please note that Beechurst Homes Limited is in process of strengthening the initial submission (through the instruction of ecological surveys, transport surveys, updated masterplanning outputs and viability reporting) to further confirm this and seeks to submit this additional information at Preferred Strategy stage. At present, the preliminary results of the surveys in process of being undertaken suggest that the site's performance against the aforementioned objectives will likely be considered as 'Green'.</p>	<p>Noted. This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.</p> <p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>
<p><u>Extent of flexibility allowance</u></p> <p>Paragraph 5.58 of the Development Plans Manual (Edition 3, March 2020) is clear that there is a requirement for a flexibility allowance to be added on top of the housing requirement to derive the number of homes that the RLDP should plan for over a plan period. This is in the interest of ensuring that sufficient housing is delivered when some allocated sites either are not delivered or deliver less homes than anticipated. Paragraph 5.59 adds that the extent of the flexibility allowance should be informed by local issues with 10% being a starting point (i.e. as the minimum).</p>	<p>Noted, the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers provide greater detail on this.</p>
<p>Beechurst Homes Limited recognise that the extent of the flexibility allowance will be determined considerably later in the RLDP preparation stage, likely at Deposit stage and that it is, therefore, premature to comment too much on it at this time. Notwithstanding this, Indicator OB4 MT3 of the Annual Monitoring Report (October 2022) for the period from April 2021 to April 2022 recognised a cumulative shortfall in housing delivery against the LDP's housing trajectory. Historic performance against this indicator is presented in the table below.</p>	

<p>Year % Delivery against cumulative required rates</p> <p>2015 -5%</p> <p>2016 3%</p> <p>2017 -2%</p> <p>2018 -6%</p> <p>2019 -9%</p> <p>2020 -12%</p> <p>2021 -14%</p>	
<p>Importantly, this is against the housing requirement of 10,350 homes and not the 11,623 homes that the adopted Local Development Plan (January 2015) plans for. In essence, in 2021 where the rate is a -14% rate, this is 14% below the housing requirement but 26% below the number of homes that were planned for which incorporated the 12% buffer in the adopted LDP. Even at this stage, it is clear from the above that the 12% buffer in the adopted LDP is entirely inadequate and a greater buffer should be incorporated for the RLDP.</p>	
<p><b>Employment Land options</b></p> <p><b>Recommendation One –</b></p> <p><b>4. Is this requirement appropriate for Newport?</b></p> <p><b>5. Should it be different and if so, why?</b></p> <p><b>Recommendation Two –</b></p> <p><b>6. Should some sites be removed from the employment supply? Why?</b></p> <p><b>7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.</b></p>	
<p>Beechurst Homes Limited has no comments to make on this matter at this point in time but reserves its position to do so in future stages.</p>	<p>Noted</p>
<p><b>Spatial Options</b></p> <p><b>8. Which of these options do you feel is the most appropriate, and why?</b></p> <p><b>9. Are there any other spatial distributions that should be considered, and if so, why?</b></p> <p><b>10. Are there any other matters that should be given consideration when assessing these?</b></p>	
<p><u>Background</u></p> <p>Chapter 4 of the Growth and Spatial Options paper presents four Spatial Options as to how the requirements outlined in Chapters 2 and 3 should be distributed spatially. Four options are presented:</p> <ul style="list-style-type: none"> <li>-PDL-led - focus new development on previously developed (brownfield) land;</li> <li>-Urban Expansion - focus on a series of greenfield allocations on the edge of the urban boundary;</li> <li>-Village Focus - directing growth to nine identified villages; and</li> <li>-Hybrid - a hybrid of the previous three options.</li> </ul> <p>Paragraph 3.44 of Planning Policy Wales (Edition 11, February 2021) provides guidance as to how the site search sequence should be undertaken when identifying residential allocations, stating that:</p>	<p>Noted</p>

"Where there is a need for sites, but it has been clearly demonstrated that there is no previously developed land or underutilised sites (within the authority or neighbouring authorities), consideration should then be given to suitable and sustainable greenfield sites within or on the edge of settlements. The identification of sites in the open countryside, including new settlements, must only be considered in exceptional circumstances and subject to the considerations above and paragraph 3.50 below." This rhetoric places PDL as the priority but allows development on sustainable greenfield sites.

Commentary on reliance on PDL-led approach

Whilst national planning policy states the delivery of PDL is a priority, the Growth and Spatial Options paper recognises that there is insufficient PDL available for the continuation of the PDL-led approach taken in the adopted LDP (and the Unitary development Plan prior). The first paragraph of Section 5 is clear on this, stating: "While the merits of continuing this strategy are understood, there is some concern that previously developed land is a finite resource and the availability of sites may not be as buoyant as it was or the reuse of land for housing may require the de-allocation of some employment sites."

On this basis, it is evident that the PDL-led Spatial Option is not going to be sufficient to meet the higher Growth Options discussed in earlier comments of this form and supported by Newport's role in a National Growth Area of Future Wales. There is also a wider point to consider - this relates to whether reliance on a PDL-led strategy is sufficiently robust to ensure that the housing requirement is delivered in full. The adopted LDP relies on a PDL-led strategy and, as discussed in earlier comments of this form, this has resulted in a significant shortfall of housing delivery compared to the housing trajectory.

Analysis from the Annual Monitoring Report (October 2022) for the period from April 2021 to April 2022 shows that there are 1,189 (equating to 11.5% of the total housing requirement) units that the adopted LDP anticipated to be delivered on brownfield sites in the adopted LDP plan period but now are not expected to be delivered prior to its end date in 2026.

From the above, it is clear that there is not enough PDL land for the implementation of a PDL-led Spatial Strategy and that, even if there was, the implementation of a PDL-led approach would likely result in a shortfall in delivery against requirement.

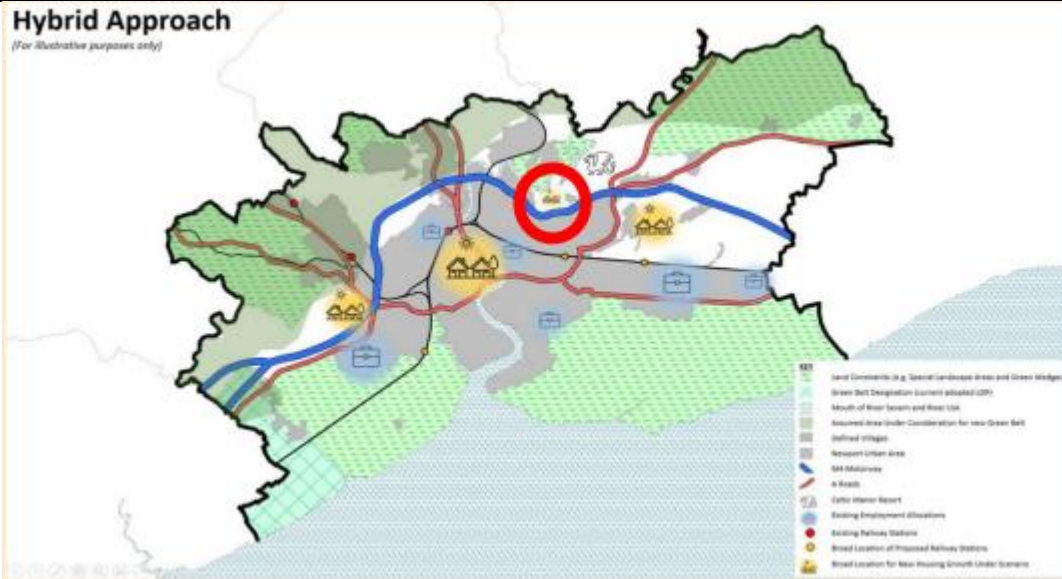
Beechurst Homes Limited therefore suggest that:

- Any 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;
- No PDL allocations should be made on sites with capacity for less than 50 homes (as many of the smaller allocations in the current LDP have not delivered). Sites of less than 50 should be allowed to come forward as windfall sites; and
- 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 (as now required by Development Plan Manual (Edition 3, March 2020) in any event).

<p><u>Suggested approach</u></p> <p>As outlined in the Growth and Spatial Options paper, Beechurst Homes Limited recognises that the Village Focus option would "direct housing development towards the nine defined villages of Castleton and Marshfield; St Brides; Bishton; Llanwern; Underwood; Llanvaches; Parc Seymour; Christchurch and Caerleon".</p> <p>As part of this, the document recognises that "some villages are more constrained than others and as a result less constrained villages would support a high proportion of growth under this scenario".</p> <p>Beechurst Homes Limited wishes to emphasise the suitability of the village of Christchurch (and specifically land to the North of Christchurch Hill, Christchurch) for residential development - this is highlighted in further detail below. However, Beechurst Homes Limited are also cognisant of the fact that directing all growth to villages only is not necessarily sustainable - this is confirmed in the Growth and Spatial Options paper which notes that "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".</p> <p>In light of the above, it is evident that the Higher Growth Options set out in the Growth and Spatial Options paper (including the modified Option 2 that Beechurst Homes Limited support) are unlikely to be able to be met in their entirety through either the 'Village Focus' Spatial Option or the 'Urban Extension' option and, therefore, it is suggested that the 'Hybrid Approach' Spatial Option represents the only suitable Spatial Option that can deliver the Higher Growth Options that are suggested and continue to perform strongly against the RLDP objectives. As part of this, it is essential that the 'Hybrid Approach' Spatial Option directs new housing to the most appropriate locations, which, as set out below, should include the village of Christchurch.</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p> <p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>
<p><u>Christchurch</u></p> <p>As part of the 'Hybrid Approach' Spatial Option, which is supported by Beechurst Homes Limited, it is understood that a proportion of housing would be directed to sites surrounding existing villages. In this way, it is positive to see that both diagrams for the 'Village Focus' approach and the 'Hybrid Approach' specifically identifies Christchurch (as circled in red below) as a 'Broad Location for New Housing Growth Under Scenario'.</p>	<p>Noted. The Deposit Plan will include reviewed urban and village boundaries and green wedge designations.</p>

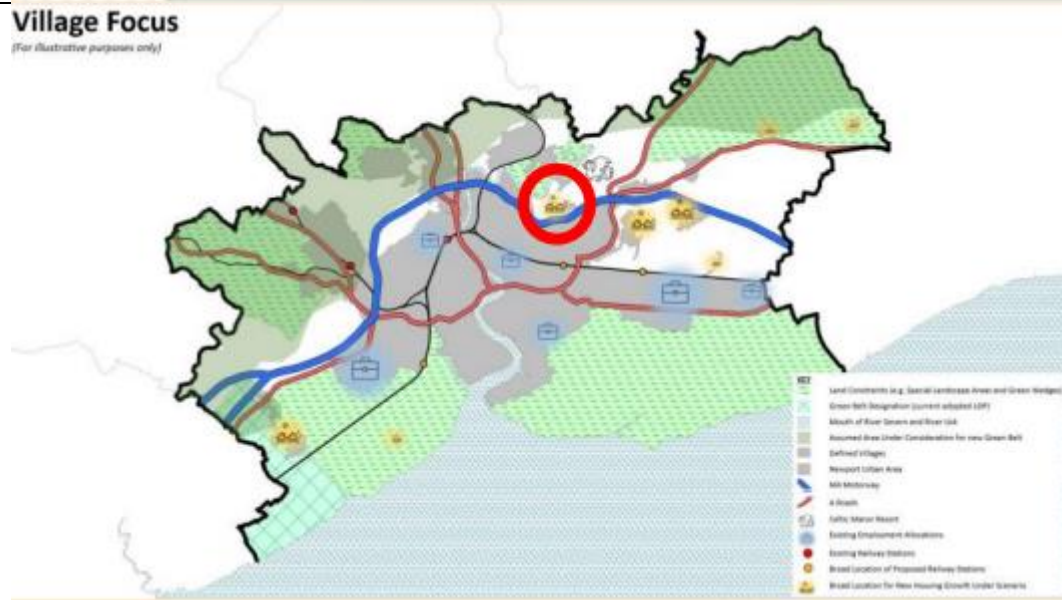
### Hybrid Approach

(For illustrative purposes only)



### Village Focus

(For illustrative purposes only)



<p>It is recognised that the above diagrams are illustrative in nature and do not seek to identify specific sites. Notwithstanding this, Beechurst Homes Limited support the identification of Christchurch as an appropriate location for new residential development. The fact that the village of Christchurch has been identified as suitable under not only under the 'Village Focus' spatial option but also the 'Hybrid Approach' spatial option (where other villages are not shown) further demonstrates the inherent suitability of Christchurch as a sustainable location for housing growth. In this way, the village of Christchurch represents a wholly appropriate opportunity to meet housing demand as a component of the 'Hybrid Approach'.</p> <p>Christchurch is considered to be one of the top performing of the nine defined villages in terms of suitability and sustainability. Christchurch, and specifically land to the North of Christchurch Hill, Christchurch, is considered a highly suitable location for new housing as part of a 'Hybrid Approach' Spatial Option for the following reasons:</p> <ul style="list-style-type: none"> <li>• It is largely free from fundamental constraints in that its elevated position means it is not at flood risk, is outside of the 'Assumed Area Under Consideration for New Green Belt' and, is not washed over by (and is outside of) significant landscape, ecological and heritage designations;</li> <li>• Christchurch is a sustainable location well-connected to existing local bus and active travel routes and contains a range of local services (public house, village hall, church etc.); and</li> <li>• It would add to the range and choice of housing supply locally in a context where the adopted LDP did not make new housing allocations within Christchurch (instead only creating a positive planning context for a series of existing housing commitments which have now been fully delivered).</li> </ul> <p>Whilst it is recognised that this consultation is not focussed on assessing individual sites such that they can be allocated, Beechurst Homes Limited would emphasise the fundamental suitability of Land to the North of Christchurch Hill, Christchurch to accommodate new housing.</p>	
<p><u>Next Steps &amp; Update</u></p> <p>As previously outlined, Beechurst Homes Limited has instructed additional information - which is currently being prepared - to support the Candidate Site exercise at Preferred Strategy stage that will further demonstrate the technical acceptability, suitability and deliverability of Land to the North of Christchurch Hill, Christchurch. This information includes:</p> <ul style="list-style-type: none"> <li>• Tree Survey;</li> <li>• Transport Technical Note;</li> <li>• Masterplan;</li> <li>• Preliminary Ecological Appraisal;</li> <li>• Landscape and Visual Statement; and</li> <li>• Viability Note.</li> </ul>	<p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>

<p>At this point, Beechurst Homes Limited wishes to confirm that the additional information has been instructed - the preliminary findings of which conclude the site is suitable for residential development - will be formally submitted to NCC at Preferred Strategy stage which is anticipated in autumn 2023. Communication with NCC indicates that at Preferred Strategy stage the Council will be re-opening the Call for Candidate Sites as they are obliged to consider new sites and as such will accept supplementary provisions on formally submitted Candidate Sites (as is the case here).</p>	
<p><b>EVIDENCE BASE:</b>  <b>11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</b>  <b>12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</b></p>	
<p>Beechurst Homes Limited has no comments to make on this matter at this point in time but reserves its position to do so in future stages.</p>	<p>Noted</p>
<p><b>Other Comments</b></p>	
<p>Beechurst Homes Limited has no comments to make on this matter at this point in time but reserves its position to do so in future stages.</p>	<p>Noted</p>

**GSO 034 - Wentlooge Community Council - 00028**

Question / Response	Officer Response
<p>Peterstone and St.Brides are villages in the Gwent Levels. The Levels are an ancient landscape with a special cultural significance. This area is also important for biodiversity, recreation, flood alleviation, carbon storage and food production.</p> <p>We take the protection of our environment and historical structure of the Levels very seriously. The Minister has also laid a great deal of emphasis on the character and historical appearance of the Wentlooge Levels specifically in a statement released by the Welsh Government and in decisions on PNS planning applications in this area.</p> <p>The area of the Wentlooge Levels is open countryside, a designated Site of Special Scientific Interest (SSSI), a CADW/ICOMOS UK Registered Landscape of Outstanding Historic Interest, an Archaeologically Sensitive Area, adjacent to the new Wales Coastal Path and to the internationally important RAMSAR site of the Severn Estuary.</p> <p>The Levels are a Special Landscape Area (SLA) recognised nationally and internationally (NCC,LDP Policies SP5 and 8).</p> <p>Planning Policy Wales (PPW) 10 sets out that "planning authorities must seek to maintain and enhance biodiversity in the exercise of their functions. This means that development should not cause any significant loss of habitats or populations of species, locally or nationally and must provide a net benefit</p>	<p>The Deposit Plan will include a review of the urban and village boundaries. The Settlement Assessment Background Paper provides a village appraisal.</p>

<p>for biodiversity" (para 6.4.5 refers). This policy and subsequent policies in Chapter 6 of PPW 10 respond to the Section 6 Duty of the Environment (Wales) Act 2016*.</p> <p>The area of the Wentlooge Levels has seen a revival in species of recent years which has been helped by the Living Levels project. An example of which has been an increase in the sightings of one of the UK's rarest bees, the Shrilla Carder Bee, a significant rise in the swan population together with many other nesting and migrating birds, water vole and dive beetle, just to list a few.</p> <p>It is important that biodiversity and ecosystem resilience considerations are considered at an early stage in development plan preparation and when proposing or considering development proposals. The Replacement Plan should be proactive in embedding appropriate policies to protect against biodiversity loss and secure enhancement in the area of the Wentlooge Levels.</p> <p>St Brides is referenced specifically as a possible site of development. Like its neighbouring village of Peterstone it currently has no amenities other than a community hall and there is no regular public transport. For this reason, we feel that St Brides should be designated as a no expansion village in the same way as Peterstone already has been.</p> <p>Should significant investment be made in local amenities and public transport, development could be more sustainable. This would need to include investment in the local road network, as the road quality is currently poor and in places dangerous. However, any development would need to be within the constraints of the various designations listed above in order to protect the significant environmental, cultural and historical value of this area, which we feel would be hard to achieve.</p>	
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**GSO 035 - Mr R Herbert - 00174**

<b>Question / Response</b>	<b>Officer Response</b>
<p>We set out herein our client's response to the Newport Local Development Plan (rLDP) Growth and Spatial Options consultation paper. Our client, Mr Herbert, owns two sites that are being promoted for development through the rLDP and have been submitted as candidate sites to help deliver the Council's future plan. Mr Herbert is pleased to be able to have the opportunity to feed into the early stages of the Plan preparation process and hopes that our input is helpful in forming the key components of the Plan.</p> <p>We have previously submitted candidate sites for consideration on Mr Herbert's behalf at South and West of Bettws and Risca Road, Rogerstone.</p> <p>Summarily, the site (c.12.5ha) at Bettws is capable of delivering c.450 high quality homes, including specialist housing for the elderly, self-build and affordable housing. In addition it can provide</p>	<p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>



<p>c.1.5Ha(6,000 to 8,000 sq.m) of employment and community uses (mixed uses) in order to help enhance self-containment and boost the local economy whilst providing onsite space for community groups, classes and clubs etc. The site provides a significant opportunity for long term sustainable development, investment and enhancement of Bettws which would be both deliverable and viable. A site location plan of the candidate site submitted is included at appendix 1 for ease of reference.</p> <p>The second site submitted at Risca Road, Rogerstone, is capable of accommodating between 10 and 20 self-build units although consideration could also be given to other types of dwellings such as for the elderly or a small scale developer, the area submitted as a candidate site is included at appendix 2 for ease. It is noted that Mr Herbert is also making his land available to be considered as part of a larger area of land with adjoining landowners and separate representations will be made in support of this. It is noted, that the circumstances of the larger site which was submitted at the initial call for sites, but where it was not possible to provide additional information (due to COVID not allowing elderly shareholders to meet and the ill health and subsequent demise of the chairman of Woodland Amenities Limited). We can confirm that the whole of that site is now available for consideration in the RDLP, comprising land belonging to R Herbert, D &amp; M Vaughan and Gwyllt Limited along with land owned by Woodland Amenity Trust who our client is working with. Please see attached location and masterplans for the latest proposal in appendix 3.</p> <p>Our client is in discussions with prospective house builders and housing associations in respect of both sites and would welcome discussions with the Council on each of the sites on how they can contribute towards the Plan. Indeed, our client is keen to demonstrate that both sites would be deliverable, viable and sustainable such that they can provide a timetable for delivery to feed into the Council's trajectory both in terms of private and affordable homes. Whilst initial work on master planning, viability, ecology, landscape, transport and capacity has been undertaken (much of it previously submitted to the Council), an early meeting with the Council would assist with planning further work that is required on each of the proposals.</p> <p>Our client's response to the Growth and Spatial Options consultation is set out below and is to be considered against their overarching role which is to assist the Authority in achieving the objectives of the LDP and the Future Wales aspiration for Newport to increase its Strategic Role in the region.</p>	
<p><b>GROWTH OPTIONS:</b>  <b>Growth Scenarios -</b>  <b>1. Are there any scenarios that have been discounted which should be considered further, and why?</b></p>	
<p>We are strongly of the view that it is appropriate to discount the low growth options. In this regard, Policy 33 of Future Wales states that the Welsh Government support an "increased strategic role"</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred</p>

<p>however this cannot be a continuation of its existing role or approach towards growth and the benefits that it can bring, rather it requires enhanced levels of growth and investment.</p> <p>Table 1 provides a useful point of reference for establishing how an increased strategic role may be facilitated. Clearly in order to comply with Future Wales the Plan requires a level of growth that is at the very least equal to or greater than the current LDP level of growth. As such it removing the PG Short Term level of growth cannot be justified. Whilst they are very similar, this along with the Dwelling Led 5yr level are the only two approaches that would seek a higher level of growth than is presently the case and therefore comply with Future Wales, all of the others would imply a reduced strategic role.</p> <p>Notwithstanding this, we accept the Council's reasons for discounting at this stage in order to avoid duplication of consideration. We set out the reasons for a higher level of growth in more detail in our answer to question 2 below.</p>	<p>Strategy Consultation Paper and associated Background Papers.</p>
<p><b>2. Which of the options do you feel is the most appropriate, and why?</b></p>	
<p>It is clear that the only two options that are appropriate, in line with Future Wales and an increased Strategic Role for Newport are those that are higher than the existing LDP level and in this regard we strongly believe that the Dwelling Led 5yr level is the most appropriate. It is clear that Future Wales anticipates Newport growing "in and immediately adjoining" the settlement and an increased strategic role for the city. As such it is key that an aspirational level of growth is sought that seeks to drive the increase to reflect the strategic role that Newport plays and to drive the regional economy.</p> <p>We would note that Wales as a whole is facing its most significant challenges for some considerable time and it is without question the case that the Replacement LDP is being prepared under some of the most challenging societal and economic conditions since World War Two.</p> <p>There are numerous factors providing the context for the level of growth sought which we believe point towards the higher levels. We set these out summarily below but note their importance in a higher growth requirement.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><u>Post Covid 19 recovery, energy crisis and Brexit</u></p> <p>It is clear that Newport faces significant challenges in order to achieve an increased strategic role in the context of the post Covid economy, Brexit Recovery and the ongoing energy crisis. Indeed, over recent years we have experienced exceptional circumstances that have the potential to severely and drastically impact upon the economy and society as a whole. We believe that the planning process must play its part in helping to facilitate the economic recovery that is needed. Plainly economic recovery must form an over-riding requirement of the plan and without question must underlie the approach to be taken. An</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

<p>appropriate response to achieve an increased strategic role would be to plan for higher levels of growth than over recent plan periods.</p>	
<p><u>Constraints in adjoining Authorities</u>  In addition to meeting its own needs the Council will need to consider the lack of housing supply in neighbouring Authorities. Indeed, Future Wales is also clear that "Growth at Newport will help manage the development pressures in the region by providing a strategic growth focus for the eastern part of the area". Newport has not just been dealing with its own needs in recent years and accordingly needs to consider the offsets from new homes not being provided in its neighbouring authorities. Whilst housing land supply requirements were formally abandoned by the Welsh Government, it does not change the record of poor delivery elsewhere and it follows logically that where needs aren't met within an Authority, they will need to be accommodated somewhere. Whilst this is an unsatisfactory and unsustainable position there is unlikely to be any change in this in the short term. Indeed:</p> <ul style="list-style-type: none"> <li>- Torfaen &amp; Caerphilly - as of April 2021 there was a cumulative shortfall across the two Authorities of over 4,000 dwellings from the levels envisaged within their respective Local Development Plans. This represents the number of households that could not be provided for in those respective Authorities. This is a shortfall of national significance that has a profound effect on house prices across the region; and</li> <li>- Monmouthshire - representations made by the Welsh Government on the Monmouthshire rLDP mean that further new housing allocations would not be needed in Monmouthshire.</li> </ul> <p>Given the additional constraints in Monmouthshire, including Phosphates and anticipated marine nitrates, it is likely that demand will be displaced from Monmouthshire to adjoining Authorities. Plainly, policy and supply constraints in adjoining Authorities will have a significant impact upon Newport City Council in respect of the housing market and affordability issues. This is a challenge that the LDP needs to respond to with higher growth rates than previous years in order to achieve an increased strategic role.</p>	<p>Noted. NCC is supportive of cross council working and joint working and effectively tackling cross boundary issues.</p> <p>The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><u>Meeting needs</u>  It will be of utmost importance to ensure Newport establishes a level of growth that meets needs and does not exacerbate the existing supply constraints in South Wales, taking into consideration the shortfalls in adjoining Authorities alongside Newport's own needs. We believe that the 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. In this regard it is noted that:</p> <ul style="list-style-type: none"> <li>-given the potential impacts of Covid 19 on the economy and society, there will be a need to adopt a highly ambitious strategy which provides far greater flexibility to respond to the crisis through added stimulation of the construction sector;</li> <li>-account should be taken in the baseline figures of the levels of sustainability and selfcontainment that can be achieved through embracing working from home trends for those sectors where it is feasible.</li> </ul>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

<p>These are often the high added value jobs that are no longer tied to cities such as Bristol or Cardiff but can retain expenditure in the local area and enhance their vibrancy; and          -any requirement should ensure an appropriate level of flexibility for delivery. Indeed, it may be that a 20% flexibility allowance or greater provides an appropriate starting point. We will comment on this further when detailed information becomes available.</p>				
<p><u>Addressing affordability</u>          The Council's result in approaching its affordable housing target for 2015-2020 is to be welcomed. However, the Council recognise that this is only a small proportion of the actual level of need. The latest Local Housing Market Assessment (LHMA) indicates that "as of the 31st March 2017 there were 6,838 households with active applications on the housing waiting list. In order to clear this backlog during the 5 year life of this LHMA we would need to allocate 1,368 units of accommodation each year". The final stated annual shortfall is 559 per annum which equates to 2,795 over the five year period. This is plainly a significant issue within the Authority which has no doubt been exacerbated by price increases that have been caused due to shortages of housing supply outside of the County.          Our client is of the view that the replacement LDP provides an opportunity to seek to address affordability in a meaningful and substantive way.</p>	<p>Noted.</p>			
<p><b>3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</b></p>				
<p>We have considered the assessment of each of the options and have commented where we believe that the assessment could be reviewed. Importantly, with regards to the lower growth options that are considered (options 2 to 6) in the first instance, we do not believe that these will contribute towards the Future Wales aim for Newport to have an increased Strategic Role in South Wales. This should form part of the assessment.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>			
<p><u>Option 1: 12,570 new homes and 12,945 jobs</u>          With regards to the higher growth option we have suggested that a number of the "colours" should be improved based on the potential for positive outcomes. Indeed, greater levels of investment in line with an Increased Strategic Role for Newport would have the potential to bring many significant benefits across the assessment areas. We are strongly of the view that this is the only option that would allow Newport to strive towards an increased Strategic Role in line with Future Wales.          Our analysis is below.</p>	<p>This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.</p>			
<table border="1"> <tr> <td data-bbox="91 1141 353 1220">Economy &amp; Employment</td> <td data-bbox="353 1141 1377 1220">We support the overall conclusions of this assessment</td> </tr> </table>		Economy & Employment	We support the overall conclusions of this assessment	
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<table border="1"> <tr> <td data-bbox="91 1220 353 1300">Population &amp; Communities</td> <td data-bbox="353 1220 1377 1300">We support the overall conclusions of this assessment</td> </tr> </table>		Population & Communities	We support the overall conclusions of this assessment	
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<table border="1"> <tr> <td data-bbox="91 1300 353 1366">Health &amp; Well Being</td> <td data-bbox="353 1300 1377 1366">We support the overall conclusions of this assessment</td> </tr> </table>	Health & Well Being	We support the overall conclusions of this assessment		
Health & Well Being	We support the overall conclusions of this assessment			

Equality, Diversity and Inclusion	We support the overall conclusions of this assessment		
Transport & Movement	Newport has been identified as a location for growth within Future Wales specifically because it is a sustainable location for growth. Its communities are well connected to public transport and well served by facilities. Indeed, our clients' sites at Risca Road are clear examples of this, being within two minutes walking distance of a train station. We note that it is indicated that more opportunities for investment could be apparent under high scenarios, we believe that the Council's assessment should be more positive on this - indeed, higher levels of growth would enable a step change in investment and enhancement that could be a significant benefit. This should be re-assessed as green. Indeed, this is far more likely to be the case than for small scale, incremental and piecemeal infill development and ad-hoc brownfield sites.		
Natural Resources	We are surprised by the comments set out herein, it is noted that water consumption would increase for all options however, there are sustainable means of managing this. Much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts. New greenfield sites can provide a means of softening urban edges through more appropriate landscape buffers, open space and interface with rural areas. We also support the notion that greater investment brings the potential for more sustainable lifestyles, as greater facilities would exist and as construction techniques evolve and progress. We are strongly of the view that with appropriate planning interventions, this could be at least an orange category if not green.		
Biodiversity and Geodiversity	Again the categorisation red seems inappropriate (Option 5 and 6 are green) yet brownfield sites have equal (if not greater) chance of disturbing habitats and actually being unable to adequately mitigate. There is significant opportunity to provide ecological enhancement and net gain from greenfield sites, this includes to Sites of Importance for Nature Conservations (SINCs).		
Historic Environment	We would note that each case would need to be dealt with based on its own merits, albeit there are more heritage assets (including Listed Buildings and Conservation Areas) within the urban area than there are in surrounding green fields.		
Landscape	As noted earlier much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts. New		

	greenfield sites can provide a means of softening urban edges through more appropriate landscape buffers, open space and interface with rural areas.		
Climate change	With regards to Flooding, there are considerable issues for existing properties in Newport, growth means higher investment and the potential to contribute towards solving existing problems Increased investment in local facilities would mean potentially increasing sustainability. A higher growth strategy will actively prevent growth being dispersed. Indeed, low growth means that people would "jump" the green belt - leading to greater in commuting or travel to Bristol and Cardiff.		
With regards to the remaining options, we note: <u>Option 2: 9,450 new homes and 10,695 Jobs &amp; Option 3: 9,570 new homes and 8,640 jobs</u> Given the similar scale of growth we consider both options in the following table in order to minimise duplication. It is noted in the first instance that these would be contrary to the Future Wales aspiration for Newport to achieve an increased strategic role. We support the overall conclusions of this assessment			This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.
Economy & Employment	We support the overall conclusions of this assessment		
Population & Communities	We support the overall conclusions of this assessment		
Health & Well Being	We support the overall conclusions of this assessment		
Equality, Diversity and Inclusion	We support the overall conclusions of this assessment		
Transport & Movement	We support the overall conclusions of this assessment for both options.		
Natural Resources	As with option 1, we are surprised by the comments set out herein, it is noted that water consumption would increase for all options however, there are sustainable means of managing this. In addition, much of the landscape surrounding Newport (here it is not at risk of flooding) is heavily influenced by negative urban impacts. New urban extensions can provide a means of softening urban edges through more appropriate landscape buffers, open space and interface with rural areas. We also support the notion that greater investment brings the potential for more sustainable lifestyles, as greater facilities would exist and as construction techniques evolve and progress. We are strongly of the view that with appropriate planning interventions, this could be at least an orange category if not green.		

Biodiversity and Geodiversity	Again the categorisation seems inappropriate (Option 5 and 6 are green) yet brownfield sites have equal (if not greater) chance of disturbing habitats and actually being unable to adequately mitigate. There is significant opportunity to provide ecological enhancement and net gain from greenfield sites, this includes to SINCs and Special Areas of Conservation (SACs).		
Historic Environment	It is unclear why options 2 and 3 are scored differently. We would note that each case would need to be dealt with based on its own merits, albeit there are more heritage assets (including Listed Buildings and Conservation Areas) within the urban area than there are in surrounding greenfield.		
Landscape	We support the overall conclusions of this assessment		
Climate change	With regards to flooding, there are considerable issues for existing properties in Newport, growth means higher investment and the potential to contribute towards solving existing problems. Increased investment in local facilities would mean potentially increasing sustainability. A higher growth strategy will actively prevent growth being dispersed. Indeed, low growth means that people would “jump” the green belt – leading to greater in commuting or travel to Bristol and Cardiff.		
<p><u>Option 4: 7,950 new homes and 9,405 Jobs, Option 5: 8,100 new homes and 6,720 jobs &amp; Option 6: 7,605 new homes and 5,835 jobs</u></p> <p>Given that Options 4, 5 and 6 are low growth options with broadly similar levels of new homes, we set out our combined comments on these options below in order to avoid duplication. It is noted in the first instance that these would be contrary to the Future Wales aspiration for Newport to achieve an increased strategic role.</p>			This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.
Economy & Employment	We are of the view that these low growth options should all be categorised as red as they would not provide the combination of jobs and homes required to provide an increased strategic role for Newport		
Population & Communities	We are of the view that these low growth options should all be categorised as red as they would not provide the combination of jobs and homes required to provide an increased strategic role for Newport		
Health & Well	Being At the lower scales of growth these options are unlikely to provide the investment required in such facilities rather it would be a continuation of existing levels.		
Equality, Diversity and Inclusion	We support the overall conclusions of this assessment however, question whether this should be red given the importance of meeting needs.		

Transport & Movement	With each option there would be fewer opportunities for significant levels of investment in improved infrastructure or sustainable means of travel.		
Natural Resources	It is clear that lower growth levels would require less greenfield land which would clearly result in a continuation of the existing urban / rural interface. However, there are areas that could benefit from new landscaping / planting to soften the interface and provide visual benefits in this regard.		
Biodiversity and Geodiversity	The categorisation seems inappropriate and it is unclear why options 5 and 6 are green yet brownfield sites have equal (if not greater) chance of disturbing habitats and actually being unable to adequately mitigate due to more limited land availability on site. They do not have the same level of opportunity to provide ecological enhancement and net gain as greenfield sites, this includes to SINC's and SAC's.		
Historic Environment	We would note that each case would need to be dealt with based on its own merits, albeit there are more heritage assets (including Listed Buildings and Conservation Areas) within the urban area than there are in surrounding greenfield.		
Landscape	It is clear that lower growth levels would require less greenfield land which would clearly result in a continuation of the existing urban / rural interface. However, there are areas that could benefit from new landscaping / planting to soften the interface and provide visual benefits in this regard.		
Climate change	With regards to Flooding, there are considerable issues for existing properties in Newport, growth means higher investment and the potential to contribute towards solving existing problems. There would potentially be less investment in sustainability. Lower growth is likely to contribute towards increased commuting whereby people would be priced out of the local market and "jump" the greenbelt to alternative locations where homes are available		
<b>EMPLOYMENT LAND OPTIONS:</b>			
<b>Recommendation One -</b>			
<b>4. Is this requirement appropriate for Newport?</b>			
We are supportive of the recommendations of the Employment Land Review which seek to protect 157.8 ha of supply in order to achieve the 77ha requirement. We believe that this approach provides flexibility to achieve the Future Wales approach towards increasing the Strategic Role of Newport.			Noted
<b>5. Should it be different and if so, why?</b>			
As noted above, we support the recommendations of the Employment Land Review. Recommendation Two -			Noted



<b>6. Should some sites be removed from the employment supply? Why?</b>				
<p>The Employment Land Review recommends that all the sites listed in Table E1 of the Executive Summary are retained within the RLDP, this includes both the Solutia Site and Queensway Meadows, therefore it is unclear why their removal is being considered, further clarity over this would be required in order for us to consider further but based on the evidence available to date we oppose the removal of employment land.</p> <p>It is noted that if Newport is to achieve its increased Strategic Role, it is imperative that it is providing a balance of jobs and homes and a significant supply of deliverable land for both purposes is available.</p>		Noted. The Employment Land Review (NB not executive summary) discusses this in more detail, including the recommendations regarding East of Queensway Meadows at section 8.8.		
<b>7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.</b>				
Given our response to question 6, we have no further comments on this question.		Noted		
<b>8. Which of these options do you feel is the most appropriate, and why?</b>				
<p>We consider that the urban expansion option provides the most appropriate solution, this is framed on our approach towards growth which is based on the higher growth option (1) being the only approach that would be in compliance with Future Wales (i.e. an increased strategic role for Newport). For this reason we believe that the previously developed land (PDL) approach and Village Focus approaches should both be ruled out at this stage.</p>		Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.		
<p><u>Urban Expansion &amp; Hybrid Options</u></p> <p>We note that there are various overlaps between the Urban Expansion and Hybrid Options, and we consider them jointly in the below table given the similarities. Indeed, we believe that given the lack of large suitable previously developed sites that may be available as new allocations, the PDL element is likely to be comprised of those existing allocations that are proven to be deliverable and capable of being rolled over alongside a small scale windfall assumption. As such with both options the amount of greenfield expansion land is likely to be similar given the scale of growth required in order to meet the strategic role of the City. However, we note that in respect of villages, it is likely to only be appropriate to consider small scale development parcels to meet local needs, rather than any significant scale of expansion.</p>		This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.		
Our comments in respect of the assessment of both is set out below.				
<table border="1"> <tr> <td>Economy &amp; Employment</td> <td>Future Wales is clear that growth should be in and around Newport. As such, this approach would clearly be in line with the policy hierarchy. It is noted that over recent years there has been a concentration of development in the east of the City, there would be an opportunity with sustainable greenfield sites to re-focus on the west, north west and north of the City. We are strongly of the view that this should be green for both the Urban Expansion option and the Hybrid Option.</td> </tr> <tr> <td>Population &amp; Communities</td> <td>We support the overall conclusions of this assessment with respect to Urban Expansion and believe that the same conclusions could be drawn from the</td> </tr> </table>	Economy & Employment		Future Wales is clear that growth should be in and around Newport. As such, this approach would clearly be in line with the policy hierarchy. It is noted that over recent years there has been a concentration of development in the east of the City, there would be an opportunity with sustainable greenfield sites to re-focus on the west, north west and north of the City. We are strongly of the view that this should be green for both the Urban Expansion option and the Hybrid Option.	Population & Communities
Economy & Employment	Future Wales is clear that growth should be in and around Newport. As such, this approach would clearly be in line with the policy hierarchy. It is noted that over recent years there has been a concentration of development in the east of the City, there would be an opportunity with sustainable greenfield sites to re-focus on the west, north west and north of the City. We are strongly of the view that this should be green for both the Urban Expansion option and the Hybrid Option.			
Population & Communities	We support the overall conclusions of this assessment with respect to Urban Expansion and believe that the same conclusions could be drawn from the			

	Hybrid Option due to the fact that a similar quantum of greenfield development will be required in both scenario.		
Health & Well	We support the overall conclusions of this assessment with respect to the Hybrid Option but believe that the same conclusions could be drawn from the Hybrid Option due to the fact that a similar quantum of greenfield development will be required in both scenario.		
Equality, Diversity and Inclusion	We believe that for both Urban Expansion and Hybrid Options, the assessment should be green. Indeed, both will facilitate significant opportunities for improvements and this should not be down played.		
Transport & Movement	Newport has been identified as a location for growth within Future Wales specifically because it is a sustainable location for growth. Its communities are well connected to public transport and well served by facilities.Indeed, our clients' sites at Risca Road) are a clear example of this, being within 2 minutes walking distance of a train station.We note that it is indicated that more opportunities for investment could be apparent under high scenarios, we believe that the Council's assessment should be more positive on this - indeed, higher levels of growth would enable a step change in investment and enhancement that could be a significant benefit. This should be re-assessed as green. Indeed, this is far more likely to be the case than for small scale, incremental and piecemeal infill development and ad-hoc brownfield sites.		
Natural Resources	We are surprised by the comments set out herein, it is noted that water consumption would increase for all options however, there are sustainable means of managing this.Much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts. New greenfield sites can provide a means of softening urban edges through more appropriate landscape buffers, open space and interface with rural areas. This has been actively demonstrated on our clients' sites which act as a gateway site to Newport from Caerphilly.We also support the notion that greater investment brings the potential for more sustainable lifestyles, as greater facilities would exist and as construction techniques evolve and progress. We are strongly of the view that with appropriate planning interventions, this could be at least an orange category if not green.		
Biodiversity and Geodiversity	Again the categorisation seems inappropriate yet brownfield sites have equal (if not greater) chance of disturbing habitats and actually being unable to		

	adequately mitigate. There is significant opportunity to provide ecological enhancement and net gain from greenfield sites, this includes to SINC. This is demonstrated by work undertaken on our clients' sites, where there are significant opportunities for betterment.	
Historic Environment	We would note that each case would need to be dealt with based on its own merits, albeit there are more heritage assets (including Listed Buildings and Conservation Areas) within the urban area than there are in surrounding green fields. Sites within our clients' control would have no impacts on heritage assets.	
Landscape	As noted earlier much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts. New greenfield sites can provide a means of softening urban edges through more appropriate landscape buffers, open space and interface with rural areas.	
Climate change	With regards to Flooding, there are considerable issues for existing properties in Newport, growth means higher investment and the potential to contribute towards solving existing problems. As such, sites such as our clients where flooding is not a constraint but are in sustainable locations form a solution to this and cannot be considered negative. Increased investment in local facilities would mean potentially increasing sustainability. Appropriate levels of growth being identified would prevent growth being dispersed across numerous local authorities which has happened over recent years due to supply constraints. Low growth means that people would "jump" the green belt - leading to greater in commuting or travel to Bristol and Cardiff.	
<b>10. Are there any other matters that should be given consideration when assessing these?</b>		
In supporting our assessment of both the highest growth option and spatial approach which requires greenfield land, we set out below a number of key considerations in the benefits that they can bring. In particular in helping Newport to achieve an increased strategic role but also in terms of the other key assessment areas.		Noted
<u>Sustainable urban extensions</u> Our client is of the view that it will be important to consider all scales of potential development from minor rounding off of settlements and infill to sustainable urban extensions in line with Future ales. Indeed, the Welsh Government's guidance, "Building Better Places" actively seeks to achieve rounded communities based on the underlying principles of place making.		Noted. The Deposit Plan will include reviewed urban and village boundaries.

The Town and Country Planning Association (TCPA) indicates that the full range of planning solutions should be available to communities in order to achieve “the most sustainable pattern of development locally”. Guidance set out by the TCPA indicates that holistically planned urban extensions can enhance the natural environment and offer high-quality affordable housing and locally accessible work in beautiful, healthy and sociable communities. Such interventions could be exemplars in sustainability and energy efficiency.

The TCPA also note that “Major planned developments such as ....urban extensions provide an opportunity to design-in the greenest of technologies and infrastructure from scratch, in ways that are not possible in smaller infill schemes”. Such schemes can set a benchmark in quality and approach that can lead the way for smaller schemes elsewhere in the country.

Appropriately sized and scaled urban extensions provide the opportunity for new development to positively address existing issues by creating a planned environment to suit and cater for a critical mass of population, services and facilities. These can:

- include a variety of housing types, tenures and densities along with neighbourhood centres with mixed uses and a range of facilities;
  - provide a landscape structure that builds on existing assets, including green infrastructure within the development, linking urban areas to the countryside beyond and creating an attractive yet distinctive edge to the urban area;
  - provide opportunities for people to work locally and for small businesses to set up, grow and thrive;
  - present an opportunity to design energy efficient communities;
  - allow pedestrian, cycle and public transport networks to be fully integrated, often improving services available to the adjacent communities, increasing health and well-being by reducing the reliance on cars;
- and
- support the surrounding communities by offering facilities not available locally and by providing affordable housing for people in the care and support sectors they can ensure that the elderly can continue to live independently amongst friends and family reducing the costs of providing social and nursing care.

These concepts are best delivered through consideration of longer term time horizons and wider geographical areas so that the benefits of strategic solutions are explored. The alternative of short term, small scale, incremental and dispersed change will not yield the same overall benefits. Importantly, by applying a coherent and distinctive urban design concept and master planned approach that combines innovative solutions and reflection of local characteristics, such extensions can provide the opportunity to create a new development that has a strong local identity. This will facilitate effective integration with the existing community for whom there should be major benefits particularly in relation to supporting the existing economy and creating jobs but also in the provision of a range of housing sizes, styles and

<p>tenures to accommodate those currently priced out of the local housing market. This accords with a wide range of national planning policy requirements.</p>	
<p><u>Sustainable growth locations</u>  It is inevitably the case that the supply of brownfield sites in Newport for redevelopment for residential purposes is limited. As such, the Council will need to consider sustainable and appropriate greenfield locations based around existing communities. In reality, this is likely to focus on the western and north western parts of the County extents associated with existing built form and communities. Indeed, we are of the view that the LDP must not neglect the requirements of these existing communities in favour of more remote areas on the Eastern side of the City that would be more aligned to commuting patterns along the M4.  It is anticipated that such focal points for proportionate growth include a number of existing communities where there are a number of local facilities that can provide an opportunity to maximise levels of self-containment and sustainability. Indeed, proportionate growth can help to reinforce existing levels of sustainability but also seek to provide additional facilities and uses that can move to a greater level of neighbourhood and community well-being. In this regard, our clients consider that Bettws and Rogerstone are suitable locations to accommodate further sustainable growth.</p>	<p>Noted. The Deposit Plan will include reviewed urban and village boundaries.</p>
<p><u>Bettws</u>  Our client controls a large area of land immediately adjoining the southern and western settlement boundary of Bettws. It offers a number of potential ways in which it could contribute to meeting needs and placemaking. It provides the potential to help deliver a significant number of homes and job opportunities for local people as noted earlier. Indeed, this is an opportunity to help to create a more sustainable self-contained community that could offer a range of land uses including residential, employment, community, recreation and commercial. This could help to create a 21st century neighbourhood in which all of the residents' everyday needs could be met within walking/cycling distance.  The sustainable site  Our clients site extends from the Llwynhaid Farmyard Courtyard in the west and wraps around the settlement towards the former comprehensive school redevelopment site from which is separated by two fields which would also be suitable for development. It is crossed by Henllys Lane and Bettws Brook in east/west direction and by Parc-y-Brain Road in a north/south direction. To the north the site is bound by the existing settlement, and the southern boundary is defined by the adjoining woodland and fields which also form part of the western boundary. The eastern edge is formed by trees and the fields separating the site from the new housing on the former school site. Given its extent, it is very well contained by both physical and natural boundaries and has limited visibility in the wider context. Bettws is a well-established, stand-alone local community that is popular with extended family groups and this proposal would offer opportunities to increase the variety of housing, freeing up larger properties and</p>	<p>The Deposit Plan will include reviewed urban and village boundaries.</p>

providing for ageing residents as well as new affordable housing for the younger generations in close proximity to excellent education facilities. Newport City Centre is within easy reach by walking, cycling and existing frequent public transport links.

The offer

The site is capable of delivering c.450 high quality homes (c.12.5Ha), including specialist housing for the elderly, self-build and affordable housing. In addition it can provide c.1.5Ha / 6000 to 8000 sq.m of employment and community uses (mixed uses) in order to help boost the local economy and provide onsite space for community groups, classes and clubs etc.

Our clients are discussing a comprehensive approach with Barratt Homes who control adjoining land which would facilitate an additional 200 new homes along with the mixed use extension proposed by Mr Herbert.

The site is within a sustainable location being close to local shops, schools and community facilities and being served by existing bus routes. It forms a significant opportunity to provide investment in these facilities and to increase the level of self-containment of Bettws through providing new homes and other land uses that could add to the level of local facilities. The site is within easy walking distance of several bus stops served by regular bus routes, typically 20 minute frequency, to and from Newport running along Monnow Way. These services would be within 400 metres of the proposed development areas but a bus route could be diverted to run through the site. In addition, the canal towpath to the east of the site offers an easy and pleasant foot/cycle path route into the City Centre, which is approximately 4km in distance.

In the centre of Bettws there are a number of local facilities, including shops, a Spar shop, post office, newsagent and hairdresser as well as several denominations of church, a library, a health centre, chemist, dental surgery and local police station, all within close proximity. The demand for retail units within the local centre rose significantly during lockdown with residents making more use of local facilities. Furthermore, Monnow Primary School is approximately 400m away and Newport High School within 750m of the site. There is also a local Welsh speaking primary at Ysgol Gymraeg Ifor Hael. Additionally Bettws has a number of established sports grounds, playing fields and a leisure centre (active living centre associated with the High School).

Sustainable neighbourhood planning

The location and size of the site, means that it provides a unique opportunity to enhance the local neighbourhood. It would add to the mix of housing, the range of facilities and services and indeed the overall sustainability of the community.

Whilst development on the edge of settlements can be a sensitive issue, by taking a landscape led approach the design has sought to ensure that the proposed development will balance the need for growth with the creation of accessible open space and interconnected Green Infrastructure that maximises biodiversity and which promotes access to recreation space for the settlement as a whole.

<p>The early concept proposals that have been submitted to the Council demonstrate that proposed development has been guided to lower lying land, areas that possess natural vegetative screening, and which benefit from intervisibility with the existing urban area. In these areas development will work with the site's topography and existing landscape features, such as hedgerows and Public Rights of Way, to create a new neighbourhood that respects the grain of the landscape and which can sensitively integrate development into its context.</p> <p>Development on higher, more exposed areas which are visually separated from the existing urban area will not take place, and instead these areas will be utilised for parkland and open space. Moreover, development will ensure that all new houses will have easy access to open space, opportunities for play and a network of new footpath and cycle routes linking east to west and north to south. These routes will ensure connectivity to the existing urban area as well as promoting access to the wider countryside. Community uses, specialist housing for the elderly and local employment uses will all be explored to ensure that this development supports the local economy and promotes social cohesion. The development will create an interconnected network of both green and blue infrastructure. This will include new woodland and meadow creation, wetland establishment and a comprehensive Sustainable Drainage System. The development will target a significant Biodiversity Net Gain.</p> <p>It is considered that the existing community will benefit from the significant investment and opportunities that an extension located at Bettws would bring. Indeed, Bettws is itself a sustainability community with a range of shops, schools and facilities and is very well served by public transport. However, it is in need of investment and opportunities in order to help reduce localised inequalities. There exists a significant opportunity to increase the level of self-containment of Bettws through providing new homes and other land uses that could add to the level of local facilities.</p> <p>Summary</p> <p>It provides the opportunity to contribute towards the vision and objectives, as well as addressing many of the issues raised in the assessment. Indeed, the location of growth can help with the creation of a new 21st century neighbourhood for Bettws that ensures 'good growth' by balancing development with Green Infrastructure, and which positively plans for social infrastructure from the initial master planning stage. Proposals can work with the landscape in order to effectively integrate a new neighbourhood into both Bettws and its local context. A comprehensive approach to the site's planning; including consideration of access, open space, public transport and biodiversity will continue to evolve the proposals and the landowner is committed to working with the local authority and wider community as proposals develop. In addition, the adjoining land promoted by Barratt Homes could add a further 200 dwellings to Mr Herbert's mixed community</p>	
<p><u>Rogerstone</u></p> <p>Our client also controls land at Risca Road, Rogerstone. The site is approximately 1ha in size and broadly rectangular in shape. It is located immediately adjoining the north western extent of the settlement</p>	<p>The Deposit Plan will include reviewed urban and village boundaries.</p>

boundary for Rogerstone. It is a former allotment garden that has degraded in its quality. To the south the site adjoins Risca Road. To the east is housing fronting Risca Road, beyond which is further residential development.

The site occupies a highly sustainable location and residents would be well placed to benefit from easy access to existing local services as well as wider facilities through walking, cycling and public transport. The Monmouthshire and Brecon Canal to the north of the site links into wider recreational and functional walking and cycling routes.

Importantly the site lies within 700m walking distance of Rogerstone Railway Station which is one of the few South Wales Metro rail connections within Newport - a focal point around which new development should be encouraged. It means that future residents of the site would be within five minutes walking distance of a transport service that links to, Cardiff, Ebbw Vale, and beyond (to Swansea, Bristol, London and the Midlands). Furthermore, regular bus services run along Risca Road providing links between Newport and Risca/Pontymister as well as between Newport and Blackwood.

The site is within easy walking and cycling distance of a good range of facilities. These include supermarkets at Afon Village and Pontymister/Risca, a post office, various shops, restaurants, places of worship, recreation (the Rogerstone Welfare and Afon Village community centre / Muga, Rivermead) and employment areas such as the Wern, Tregwilym and Pontymister industrial / trading estates as well as Cleppa Business Park.

Rogerstone Primary School (2200m), Jubilee Park (2000m) and Mount Pleasant Primary Schools (1500m), and Bassaleg Secondary School (2.8km) are also conveniently located to the site along with the Risca Community Comprehensive School (Pontymason Lane) (500m) which has a leisure centre alongside.

The wide array of local facilities affords an opportunity for future residents to maximise the proportion of their everyday lives within their local neighbourhood without relying upon the need for private car trips. Indeed, everyday needs can be catered for in the local neighbourhood and more strategic trips (for instance to the centre of Newport or Cardiff) can be made via the South Wales Metro system, reaching such destinations within 10 to 20 minutes and reducing the need to travel by car.

It is considered an appropriate location for the provision of proportionate growth that would complement existing facilities provide more opportunities for local people to remain in the area.

Importantly it would contribute to addressing a number of the issues set out within each of the draft Objectives in particular by virtue of the fact that it would be providing homes in a sustainable location that it is well linked to existing facilities and both active and public transport networks. The site presents an opportunity:

1. to provide plots for high quality self-build homes for local people helping to support the rich mix of uses and house types required. This will meet a significant need that is not currently well catered for. It will help provide homes for families for life;



<p>2. to support and enhance existing facilities and services through providing homes in an appropriate location;</p> <p>3. to provide an opportunity to focus development around the existing train station which acts as a hub where such intensification is entirely appropriate and sustainable, helping to create a move away from reliance upon the private car;</p> <p>4. to capitalise on its location in close proximity to the canal to the north and the recreational benefits associated;</p> <p>5. to increase access to other formal recreation utilising the wide range of existing facilities located nearby including the Multi Use Games Area (MUGA) at the Rivermead Centre, Risca Leisure Centre, Newport Golf Club and Rogerstone Welfare as well as the cricket clubs at High Cross, Whiteheads and Pontymister cricket and bowls facilities;</p> <p>6. to enhance the entrance into both Rogerstone and Newport from Caerphilly in the north. Indeed, the site can become an attractive gateway into the Authority;</p> <p>7. to adopt an approach to design that reflects the traditional local character, density and appearance; and</p> <p>8. to make appropriate use of a former allotment site to provide a betterment in terms of green infrastructure and biodiversity through enhancements on site and off site if required.</p> <p>It is noted that Mr Herbert is also making his land available to be considered as part of a larger area of land with adjoining landowners and separate representations will be made in support of this. It is noted for ease, that the circumstances of the larger site which was submitted at e the initial call for sites, but where it was not possible to provide additional information (due to COVID not allowing elderly shareholders to meet and the ill health and subsequent demise of the chairman of Woodland Amenities Limited ) We can confirm that the whole of that site is now available for consideration in the RDLP, comprising land belonging to R Herbert, Woodland Amenities Limited, D &amp; M Vaughan and Gwyllt Limited . Please see attached location and masterplans.</p>	
<p><b>EVIDENCE BASE:</b></p> <p><b>11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</b></p>	
<p>It is noted that only limited evidence is currently available and it is clear that there will be a need to publish significantly more evidence in respect of matters such as supply of housing land.</p>	<p>Noted</p>
<p><b>12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</b></p>	
<p>We have commented previously on the Objectives of the RLDP and reserve the right to comment further once the updated Objectives are consulted upon.</p> <p>For ease of reference, it is noted that in general terms we are supportive of the overall approach towards the objectives, however, we believe that particular attention is needed with regards to economic and population / community objectives. As we have stated earlier, there are significant challenges ahead and</p>	<p>Noted. The Deposit Plan will include reviewed urban and village boundaries.</p>

<p>it must be the role of the planning process to help address these issues rather than constrain recovery and realignment.</p> <p>We are strongly of the view that well planned urban extensions can contribute towards a range of the key objectives not just in respect of population and communities, inclusive of:</p> <ul style="list-style-type: none"> <li>• including a variety of housing types, tenures and densities along with neighbourhood centres with mixed uses and a range of facilities;</li> <li>• providing a landscape structure that builds on existing assets, including green infrastructure within the development, linking urban areas to the countryside beyond and creating a distinctive edge to the urban area;</li> <li>• providing opportunities for people to work locally and for small businesses to set up, grow and thrive</li> <li>• addressing the challenges that exist in the aftermath of Brexit and Covid and ensure that Newport can embrace and facilitate new markets and technologies;</li> <li>• presenting an opportunity to design energy efficient communities;</li> <li>• allowing pedestrian, cycle and public transport networks to be fully integrated, often improving services available to the adjacent communities, increasing health and well-being by reducing the reliance on cars; and</li> <li>• supporting the surrounding communities by offering facilities not available locally and by providing affordable housing for people in the care and support sectors they can ensure that the elderly can continue to live independently amongst friends and family reducing the costs of providing social and nursing care.</li> </ul>	
<p><b>Other comments</b></p>	
<p>It is noted that our client is currently in the process of liaising with house builders and housing associations in respect of refining development proposals for both sites. However, they would welcome engagement with the Council on whether they consider either site could play a role in the delivery of sustainable communities through the replacement LDP.</p>	<p>Noted</p>

**GSO 036 - The Coal Authority - 00324**

Question / Response	Officer Response
<p>The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, The Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.</p> <p>Our records do not indicate the presence of any recorded coal mining features at surface or shallow depth, which may pose a risk to surface stability, in the Newport City Council area. On this basis the Planning team at the Coal Authority have no specific comments to make on this consultation.</p>	<p>Noted.</p>

<p><b>GROWTH OPTIONS:</b>  <b>Growth Scenarios -</b>  <b>1. Are there any scenarios that have been discounted which should be considered further, and why?</b>  <b>2. Which of the options do you feel is the most appropriate, and why?</b>  <b>Assessment of Growth Options Against RLDP Objectives -</b>  <b>3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?1 Growth Options</b></p>	
<p>1. We agree with the approach to discount the low-growth scenarios (Employment-led OE+D Uplift; Employment-led OE, WG- 2018-LOWPOP and WG-2014-Principal). As discussed in the Growth and Spatial Options document, these scenarios would result in a low growth strategy that does not align with the Future Wales National Plan 2040 policy intentions for Newport as a 'National Growth Area' for employment and housing and therefore should not need further consideration in the preparation of the RLDP.</p> <p>2. We support an option for an ambitious level of housing and employment growth targets to reflect Newport's role as a key area for national growth, as per Future Wales: National Plan 2040.</p> <p>3. We support the approach taken, which assesses the scenarios against each of the RLDP objectives.</p>	<p>Noted</p>
<p><b>EMPLOYMENT LAND OPTIONS:</b>  <b>Recommendation One -</b>  <b>4. Is this requirement appropriate for Newport?</b>  <b>5. Should it be different and if so, why?</b>  <b>Recommendation Two -</b>  <b>6. Should some sites be removed from the employment supply? Why?</b>  <b>7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.</b></p>	
<p>4. Yes. Recommendation One for an employment land requirement of 77ha is deemed appropriate for Newport.</p> <p>Future Wales: National Plan 2040 identifies Newport as a nationally important area for housing and employment growth (Policies 1 and 33). The RLDP must accord with National Policy objectives and therefore a positive strategy that supports a strong level of employment growth is considered appropriate.</p> <p>Policy 33 of Future Wales states that "the Welsh Government supports an increased strategic role for Newport as a focus for sustainable, long term growth and investment." (emphasis added). As stated within the Employment Land Review (ELR) undertaken by BE Group (February 2022), Newport has a</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

strong workforce of 70,000 employees (BRES, 2020); positively contributes to the economy of the wider Cardiff Capital Region (CCR) (12.7%); and has seen a strong level of employment growth (11.8% between 2000 and 2020 (pp. 3.18)). This level of employment growth substantially exceeds the growth rates recorded for CCR (2.4%), Wales (0.7%) and Great Britain (4.4%). In order to comply with national policy and achieve an increased strategic role for Newport, the RLDP should adopt an appropriately ambitious growth strategy.

We agree that it is not appropriate to adopt the alternative Oxford Economics (OE) projections, which underestimate projected growth and forecast a negative need for employment land over the plan period. The OE method assumes that any declining employment land supply could be easily taken up by any potential growth sectors, whereas in reality, former industrial sites are not necessarily appropriate for growing office demand, for example (ELR, pp. 7.22). We therefore support the evidence and findings provided within the ELR, which considers growth sectors only and recommends using past rates of delivery as a reliable method for predicting future employment demand for Newport, resulting in the 77ha employment land requirement presented in Recommendation One.

We also note that the ELR confirms that the identified employment site allocations provide a supply of land amounting to 157.8ha, which is more than sufficient to meet the 77ha requirement.

5. No, for the reasons stated above in respect of Question 4, the requirement should not be different.

6. We support Recommendation Two of the ELR regarding the status of employment land allocations. In particular, we agree that the Celtic Springs allocation (Ref: iii), which comprises 6ha of land for B1/B2/B8 Use, continues to provide an important economic function for Newport and should be retained within the RLDP. The allocation is a sustainable site that will positively contribute towards meeting Newport's employment needs for the future plan period. The ELR reviews existing allocated employment sites (summarised at Table 9), which states that Celtic Springs (allocation ref: iii) is centrally located within the business park; is serviced; benefits from having no constraints; and is deemed appropriate for B1 office uses. Celtic Springs scores very highly within the ELR's Site Grading (which is a scoring system based on Welsh Government guidance, measuring accessibility, environmental factors and market attractiveness) scoring a total 13 points out of 15. Celtic Springs is therefore "a well-positioned, attractive site with minimal adverse features" (ELR, pp. 6.9), worthy of retaining within the RLDP.

The ELR also contains an assessment of existing employment areas (summarised at Table 13) which considers that the wider Celtic Springs business park is a good quality employment area with good connectivity to key transport links along the M4 and A48. The Celtic Springs employment area is given a high score of 26 out of 30, which is based on Welsh Government guidance and considers built forms, access, amenity and quality. Retaining the Celtic Springs allocation (ref: iii) within the RLDP to support the future employment land supply in Newport is therefore favourable. This recommendation also

<p>accords with Planning Policy Wales 11 intentions for Development Plans to protect existing employment sites of strategic and local importance (pp. 5.4.3).</p> <p>7. No comment.</p>	
<p><b>EVIDENCE BASE:</b></p> <p><b>11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</b></p> <p><b>12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</b></p>	
<p>11. No comment.</p> <p>12. To summarise, we support Recommendation One to allow for 77ha of employment land for the future plan period. We also support Recommendation Two, with regards to the retention of Celtic Springs allocation (ref: iii) within the RLDP.</p>	Noted

**GSO 038 - Redrow Homes (South Wales) Limited - 00640**

<b>Question / Response</b>	<b>Officer Response</b>
<p>We write on behalf of our client, Redrow Homes (South Wales) Ltd ('the client'), to provide a response to Newport City Council's (NCC) Growth and Spatial Options consultation in preparation of the Replacement Local Development Plan (RLDP) 2021-2036, in respect of their land interests at Calon Y Pentre, Langstone (see site location plan at Appendix A).</p> <p>The above site was promoted through the Council's previous Call for Candidate Sites consultation for residential-led development in August 2021. Further details on the above site and our response to the Council's Growth and Spatial Options Paper, subject of this consultation, are set out further in this letter.</p>	<p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>
<p><b>Growth Options</b></p> <p>The Council has identified several growth options which are to be tested to determine the most suitable and sustainable strategy for housing and employment growth up to 2036. The testing of a range of growth scenarios was commissioned independently by the Council, incorporating the latest demographic evidence (including the initial 2021 Census results), to assist with their assessment of the appropriate level of growth for the city.</p> <p>The findings of The LDP Demographics report (September 2022), prepared as evidence base to support the emerging RLDP, shows that over the plan period Newport will experience population growth of between 4% and 14.9% (as estimated under the range of scenarios tested).</p> <p>On a regional basis, the population of the Cardiff Capital Region (which includes Newport) is ageing, and it is likely that a quarter of the population will be aged over 65 years old by 2039. As such, the available workforce is shrinking, and the city of Cardiff is projected to be the only local authority in the region with a growing population aged 16-64 between now and 2039. Consequently, the Cardiff Capital Region City Deal is looking to create an additional 25,000 new jobs within the region.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

A significant increase in the level of housing planned within the region is required in order to underpin the economic aspirations and opportunity provided by the City Deal.

The consultation paper acknowledges that when considering all eleven growth scenarios, some of these were deemed unreasonable and therefore discounted from assessment against the Integrated Sustainability Appraisal (ISA). The employment-led scenarios tended to result in a negative need for employment land over the plan period with outputs much lower than the adopted growth strategy. The consultation document also sets out that where scenarios have been assessed and result in a low scale of growth, these have been discounted from further assessment as they did not align with Newport's focus for growth.

Future Wales: The National Plan 2040, identifies Newport within a National Growth Area which will be the main focus for growth and investment in the south east region (Policy 33). The Welsh Government supports an increased strategic role for Newport as a focus for sustainable long-term growth and investment. The Council's strategy to discount any scenario that resulted in a low scale of growth is therefore strongly supported given that this complies with national policy and continues to support the role Newport has to play in delivering growth for the south east region.

The consultation paper also recognises that of the six growth scenarios taken forward for further assessment, these scenarios propose a wide range of potential housing and employment need. However, the Council acknowledges that new jobs need to be supported through housing growth as this is essential in enhancing Newport's economic role within the region and avoiding the need to commute outwards to work. We strongly support the Council's recognition that the delivery of housing is required to support jobs and prevent outwards commuting as for any economic growth strategy it is vital that housing growth underpins jobs growth as one cannot come forward without the other.

We generally support growth options 1 (Dwelling-led 5YR), 2 (WG-2018-HIGHPOP) and 3 (Dwellingly 10YR). These three growth scenarios also perform best against the emerging RLDP objectives of 'Economy and Employment', 'Population and Communities' and 'Health and Wellbeing'. We consider that to deliver against the Welsh Government's requirement for promoting Newport's strategic role, an increase in growth should be attributed to the city. It is also considered that apportioning a greater amount of growth to Newport will help manage the development pressures in the region by providing a strategic growth focus for the eastern part of the south east region, in accordance with the requirements of Future Wales.

In addition to directing development towards Newport as a National Growth Area, national policy also requires development to be sustainably located with easy access to public transport and other public services. In accordance with policy, the site which is subject to these representations is suitable for delivering a range and choice of housing (including affordable housing) in a sustainable location on a deliverable site. This can contribute towards the resilience of the RLDP's housing trajectory, the effectiveness of the emerging plan and aid towards defining Newport as a strategic growth area.

### Spatial Options

The Council's Growth and Spatial Options Paper sets out several spatial options available for supporting the delivery of new growth in Newport up to 2036. One spatial option considered is prioritising the re-use of previously developed land (PDL). Although we do not necessarily oppose this option, it should be recognised that there is a lack of suitable, viable and deliverable brownfield sites within the city.

Therefore, the release of greenfield land is required to meet the need for new housing. The greenfield site subject to this consultation response is free of any major constraints and is sustainably located such that it is available and deliverable for residential development.

Two alternative options, being 'urban expansion' and 'village focus', are also being considered as spatial options as part of preparing the RLDP. In terms of taking an urban expansion approach, the consultation document explains that this would require the identification of land on the edge of the urban boundary whereas a village focus would constitute directing development towards nine defined villages. These spatial options are generally supported as targeting development under either approach would see sustainable sites come forward given proximity to existing established settlements and the associated ease of access to public transport and other public services.

In terms of Langstone's options to accommodate much needed growth, it is important to note that there have been no new housing allocations in the settlement in successive plan periods (i.e., the Unitary Development Plan and the current adopted LDP). There are significant constraints to Langstone's growth, including:

- The Coldra Roundabout, Junction 24 of the M4 and the A449 provide a strong defensible boundary to the west of the settlement;
- The north of the settlement (which is expected to become a Green Belt Area for Consideration, as set out in Future Wales: The National Plan 2040) largely comprises Grade 2 BMV agricultural land along with the east of the settlement;
- The south of the settlement is constrained by the M4; and
- An acceptance that there are limited, if any, remaining available and viable brownfield sites within the settlement.

Notwithstanding the challenging constraints to growth that exist elsewhere surrounding Langstone, we consider that our client's site at Calon Y Pentre is the most sustainable and best location to accommodate the settlement's growth being located in the heart of the village closest to its facilities, amenities, and public transport links. The site proposes housing growth in a location well related to existing employment opportunities (at Langstone Business Park) and neighbourhood facilities, and therefore demonstrates the holistic approach sought by PPW, which seeks the right development in the right place to achieve sustainable placemaking outcomes.

A range and choice of housing can be provided on site. Redrow are committed to creating a place which will be suitable and attractive for new residents, and which will embrace the increasing ability to work

Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.

The Deposit Plan will include a review of the urban and village boundaries.

flexibly and from home. As well as providing for a wide mix of house types and sizes, Redrow's home design and digital connectivity ensures that working from home is an attractive option. There is also the potential for the site to provide additional ancillary neighbourhood facilities (for example, a community building or healthcare facility). The potential to incorporate this will depend on the level of growth attributed to Langstone and other sites which come forward.

Calon y Pentre proposes housing in a landscape setting with significant multifunctional green space (comprising circa 56% of the overall development area). Opportunities for local food production through the provision of a community orchard and local grow spaces can be provided along with the provision of children's play facilities and nature walks incorporating educational boards to promote social interaction and activities for the whole community. The RLDP Integrated Sustainability Appraisal Scoping Report (AECOM, 2021) identifies that Langstone has a significant shortfall of 6.42 hectares of open space. The proposal therefore provides the opportunity for existing residents to utilise the open space provided as part of the development to the benefit of the existing community. The site is best placed out of all other options for Langstone's growth to provide this benefit owing to its central location within the settlement. Calon y Pentre would therefore help create and sustain the community and accord with PPW and Policy 2 of Future Wales.

Our client's site is located adjacent to the existing settlement boundary and is free from any overriding unresolvable physical constraints, including infrastructure and utilities, access, ground conditions, landscape, heritage designations, flood risk issues and pollution. It is not located within a Phosphorus Sensitive Catchment Area and can be delivered early in the plan period to contribute towards the resilience of the RLDP's housing trajectory. It is considered that if the Council adopted an urban expansion or village focus approach, given the site is sustainably located and likely to accord with the parameters and objectives to be set within either approach, allocation of this site would therefore contribute to the soundness of the plan through assisting with its effectiveness.

The Council also propose a 'hybrid' spatial option to accommodate future growth. This would include a mix of previously developed land, sites on the edge of urban boundary and sites at surrounding existing villages. This approach is generally more supported over the other spatial options as it provides greater flexibility for allocating the right sites in the right locations to deliver development that addresses local and regional need.

Overall, we encourage the Council to ensure that sites allocated for residential use are assessed on a site by site basis. Our client's site is sustainably located, deliverable and considered worthy of allocation in the emerging RLDP. The site is located adjacent to existing development and meets the principles of 'facilitating developments which are sited in the right locations', as advocated by Planning Policy Wales (PPW) (paragraph 4.1.10).

**Evidence Base**



<p>The LDP Demographics Report states that when considering growth outcomes, it is important to note that they have been developed during a period of unprecedented social and economic upheaval caused by Brexit and the COVID-19 pandemic, the full impacts of which are not currently fully understood. Alongside these factors, the full detailed results of the 2021 Census are expected in late 2022 / early 2023 which will provide an important update to the demographic evidence base for all local authorities. Once this is available, the report recommends that NCC should consider a range of demographic scenarios and updated assumptions informed by more accurate projections. Therefore, depending on when the next stage RLDP is published, it is expected that the Council will take into consideration any updates to population and growth predications, and as such, we reserve the right to comment further on any updated figures, once made available.</p>	<p>This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail. Updated evidence will be considered as this emerges over the course of the RLDP process.</p>
<p><b>Summary</b></p>	
<p>In summary, we broadly support the growth and spatial options proposed by the Council. We encourage the Council to adopt an approach that allocates the right sites in the right locations as advocated by PPW which can demonstrate that they are suitable, deliverable, and sustainable whilst also positively contributing towards the Council's housing delivery targets and placemaking principles.</p>	<p>Noted</p>

**GSO 039 - Woodland Amenities (Rogerstone) Ltd - 00720**

Question / Response	Officer Response
<p>We are writing on behalf of Woodland Amenities (Rogerstone) Limited. The company owns an area of approximately 10 acres of land at X and are currently working with adjoining landowners, Mr Richard Herbert, Gwyllt Ltd and Mr David and Mr Michael Vaughan on a scheme for the comprehensive area. Our site was submitted as part of a comprehensive proposal at the initial call for sites but it was not possible to provide additional information in 2021 (due to the resignation of the two directors of the company and the death of the chairman). As a result, a smaller area was submitted by Mr Herbert for his land independently. However, we can confirm that the whole of the original site is now available for consideration in the RDLP, comprising land belonging to R Herbert, Woodland Amenities Limited, D &amp; M Vaughan and Gwyllt Limited.</p> <p>In this regard, Woodland Amenities (Rogerstone) Ltd are supportive of appropriate levels of growth in sustainable locations at Rogerstone in particular where there is a metro train station within a few minutes walk, such as is the case in respect of our site. Indeed, we believe that such sustainable locations should be a focus for new development across the City.</p> <p>We will of course submit more information in support of our site in due course along with other landowners and at the appropriate stage. However, given the suitability of the site and its high level of sustainability, we wanted to draw its availability to your attention and would be happy to have an early meeting with you if you would like to discuss the proposals in more detail.</p>	<p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation. The Preferred Strategy consultation provides a further opportunity to submit additional information/ further sites.</p>

**GSO 041 - Royal Society For The Protection Of Birds - 00670 Growth Options**

Question / Response	Officer Response
<p><b>GROWTH OPTIONS:</b>  <b>Growth Scenarios -</b>                      1. Are there any scenarios that have been discounted which should be considered further, and why?                      2. Which of the options do you feel is the most appropriate, and why?  <b>Assessment of Growth Options Against RLDP Objectives -</b>                      3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</p>	
<p>1, 2 &amp; 3                      RSPB Cymru has no particular comments on the Growth Scenarios outlined, but would strongly advocate that the level of growth should be determined in line with the environmental capacity of the plan area to accommodate the growth i.e. the level of growth should be based on an assessment as to the level that can be sustained without unacceptable harm to the natural environment and biodiversity.</p>	<p>Noted</p>
<p><b>EMPLOYMENT LAND OPTIONS:</b>  <b>Recommendation One –</b>                      4. Is this requirement appropriate for Newport?                      5. Should it be different and if so, why?  <b>Recommendation Two –</b>                      6. Should some sites be removed from the employment supply? Why?                      7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.</p>	
<p>4, 5,6 &amp; 7                      RSPB Cymru has no specific comments on the level of employment growth nor on most of the proposed sites. We note there is still 16 ha of land available at the Gwent Europark site and one of the options with the remaining hectares is to intensify the use of the site. We would be concerned that proper consideration is given in this scenario to the need to conserve and enhance the SSSI and other nature conservation features of the Gwent Levels and whether intensification of uses here is appropriate.</p>	<p>Noted</p>
<p><b>SPATIAL OPTIONS:</b>                      8. Which of these options do you feel is the most appropriate, and why?                      9. Are there any other spatial distributions that should considered, and if so, why?                      10. Are there any other matters that should be given consideration when assessing these?</p>	
<p>8, 9 &amp; 10                      RSPB Cymru object to the Village Focus spatial option. We do not consider it is sustainable to have the high amount of green field development this option would entail. This option would use up valuable countryside and negatively affect the biodiversity it</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.</p>

<p>supports. Existing levels of village services could not sustain this scenario and it would increase dependency on the car. This is contrary to the guiding principles of PPW.</p> <p>We object to this option as it indicates the potential for expansion of the existing villages on the Gwent Levels and this would have a detrimental effect on the areas nationally protected characteristics.</p> <p>We would support the continuation of the PDL led approach which has been operating and delivering for the Newport area in the current LDP. This represents the most sustainable use of land and will serve to help protect the designated areas of the Gwent Levels into the future.</p>	
<p><b>EVIDENCE BASE:</b></p> <p><b>11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</b></p> <p><b>12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</b></p>	
<p>The Gwent Levels is home to a rich assemblage of wildlife including one of the best assemblages of aquatic invertebrates in the country due to the extensive system of grips, ditches, reens and main rivers criss-crossing it, creating specific environmental conditions. The area hosts a number of European and UK protected species such as dormice, otter and water vole. It is home to a wide variety of birds, particularly important wetland species, such as curlews, avocet and lapwing. The areas of salt march habitat are important for species such as sea lamprey and eel. In recent times several bird species have returned to breed on the Levels after many years, including the bittern.</p> <p>Whilst the RSPB acknowledges the importance of alternative and renewable energy forms, the recent proliferation of applications for solar farms on the Levels is very concerning. Renewable energy development should not be at the expense of important habitat. A balance needs to be found. We note in the RLDP the draft Vision and Objectives supports the increasing of renewable energy development and we also note in the current adopted LDP, Policy CE10, that renewable energy proposals will be considered favourably subject to their being no overriding environmental and amenity considerations. We would urge that this is policy is pulled through into the RLDP. We would advocate that further evidence by way of a technical capacity study for solar farms is undertaken to support the evidence base behind this policy. The study should consider the environmental effects of solar farm development against the benefits, the capacity of the area to accommodate this type of development, and the cumulate effects on the area of such development.</p>	<p>Noted As part of this process the LDP team will continue to work with partners, during the preparation of the replacement LDP to ensure any amendments to policy reflect the opportunities identified.</p>

**GSO 042 - Newport Golf Club - 00622**

Question / Response	Officer Response
<p><b>GROWTH OPTIONS:</b></p> <p><b>Growth Scenarios -</b></p> <p><b>1. Are there any scenarios that have been discounted which should be considered further, and why?</b></p>	

**2. Which of the options do you feel is the most appropriate, and why?**

**Assessment of Growth Options Against RLDP Objectives -**

**3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?**

1. There are no scenarios that have been discounted that should be considered further.

2. The higher housing growth scenarios published in the growth and spatial options paper accurately reflect that the RLDP has to conform with the Future Wales' spatial strategy. The RLDP should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure. Option 1 (Dwelling-led SYR) is the most appropriate of the growth scenarios to fulfil Future Wales. The Welsh Government is determined to see development and growth in Newport, allowing the city to fulfil its potential as a second focal point for the region. Highly skilled employment opportunities in the transport and digital communications sectors should be catalysts for further economic investments. Option 1 proposes the highest amount of dwellings across the local authority. This is essential to enhance Newport's economic role. The Dwelling-led 5YR scenario has a higher but realistic population change than Option 2 WG-2018-HIGHPOP. This is the step change necessary to achieve the National Plan. Option 1 is the only option with housing supply above the current LDP strategy, therefore, reflecting Newport's focus for growth role established by the Future Wales National Plan 2040.

3. Option 1 will overall bring a neutral contribution to the RLDP objectives; population and communities, health and wellbeing, equality, diversion and inclusion and transport and movement. The risk of not achieving a step change for the City and delivery of growth as envisaged in Future Wales should be a matter for consideration when assessing the scenarios. To de- risk the plan the Preferred Strategy should be based upon a robust assessment of the capacity to deliver Option 1. Delivery and viability should be embedded in the next stages of the candidate site process. An adequate flexibility allowance should be applied to de- risk the plan. The preferred strategy should be based on an objective assessment of the role and function of places within Newport in line with the search sequence and National Sustainable Placemaking Outcomes, as set out in PPW. This will create inclusive, connected, adaptable and accessible communities that are cohesive and ensure Newport's potential is realised.

Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.

**EMPLOYMENT LAND OPTIONS:**

**Recommendation One -**

**4. Is this requirement appropriate for Newport?**

**5. Should it be different and if so, why?**

**Recommendation Two -**

**6. Should some sites be removed from the employment supply? Why?**

**7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this**

<p>4. Recommendation 1 is the minimum requirement to fulfil the expectations of Future Wales for Newport to be the focus for strategic economic growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure.</p> <p>5. Yes, it should probably be different. If the supply to match the requirement is to include the sites identified in the ELR the requirement should be higher.</p> <p>Excluding land East of the Queensway the supply amounts to just over 90 hectares. However, just over 40 hectares is ring fenced for the expansion of Eastman (Solutia). It cannot be considered as readily available to meet the broader employment land requirement to fulfil the growth strategy. Furthermore, the ELR assesses the Accessibility, Environmental Factors and Market Attractiveness of nine sites (includes East of Queensway). Three sites are considered to score highly, amounting to just under 48 hectares.</p> <p>The requirement should be for 77 hectares of readily available, accessible, and attractive employment land. Given a site is ring fenced for Eastman (Solutia) the requirement should be for 117 hectares.</p> <p>6. Given the need to fulfil the local and sub regional (CCR) employment sites, other than land East of Queensway, should not be removed from the employment land supply.</p> <p>7. TAN 23: Economic Development and PPW state that an existing employment site should only be released for other uses if other priorities, such as housing need overrides more narrowly focused economic considerations. The economic considerations are of national significance as per the growth strategy (Future Wales).</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><b>SPATIAL OPTIONS:</b></p> <p><b>8. Which of these options do you feel is the most appropriate, and why?</b></p> <p><b>9. Are there any other spatial distributions that should be considered, and if so, why?</b></p> <p><b>10. Are there any other matters that should be given consideration when assessing these?</b></p>	
<p>8. With regard to spatial options, a hybrid approach is favoured with a mixture of previously developed land, sites on the edge of the urban boundary and sites at surrounding existing villages. Where there is a need for sites and there is no previously developed land or underutilised sites, consideration can be given to suitable and sustainable greenfield sites within or on the edge of settlements. Available land at Newport Golf Club is immediately adjacent to the existing urban area. A balance of previously developed land, sites on the edge of the urban boundary and sites at surrounding existing villages will ensure a range of locations and size of sites. A range of sites de risks the delivery of the RLDP.</p> <p>The hybrid approach scores highly against the RLDP objectives for Economy and Employment, health and wellbeing and biodiversity and geodiversity. Under the hybrid approach or urban expansion option, land at Newport Golf Club could form a sustainable extension to the existing urban area. Taking into account the characteristics of the sites circa 100 dwellings could be accommodated.</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.</p> <p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>

<p>Rogerstone is a well-established location within the existing urban area. There is access to existing services and facilities within the area including schools, convenience retail, community buildings, active travel routes, bus and train services both providing direct links to the city centre. Development at West Newport is well placed to support the ongoing regeneration of the city centre.</p> <p>PPW is clear due to their strategic nature Green Belts will have significance beyond a single local authority and they should only be proposed as part of either a Joint LDP, an SDP or Future Wales. The green belt needs to be balanced with placemaking potential and achieving the growth strategy as per Future Wales. The national plan envisages strategic growth should be focused in and immediately adjoining Newport itself.</p> <p>9. The four spatial distributions provided cover the full range of options from urban to rural land use for development, with the addition of a mixture of both.</p> <p>10. The hybrid option scores favourably as per the assessment of spatial options. To de risk the delivery of the plan as per the LDP Manual 3 a further matter for consideration is the delivery risk associated with each of the spatial options. The hybrid option is low risk. Furthermore, development at Rogerstone has excellent linkages to the city centre.</p>	
<p><b>EVIDENCE BASE:</b></p> <p><b>11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</b></p> <p><b>12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</b></p>	
<p>11. The current evidence base used to inform the development of the preferred growth and spatial options strategies is sufficient and critically incapsulates Newport as a growth in National planning policy.</p> <p>12. It is important that the RLDP takes a pragmatic approach and provides a good balance between housing and employment growth opportunity. There needs to be a strong focus on those identified areas for growth in the paper. A good range of different house types and tenures in a range of locations should be supported through the RLDP, taking advantage of available land on the edge of Newport to help to deliver an appropriate scale of growth for the City.</p> <p>NGC has hosted numerous national and international events through the years. On an annual basis we host the Tucker Trophy which attracts some of the finest golfing talents around the UK and further afield, this event is hosted in conjunction with Wales Golf and is a world amateur ranking event.</p> <p>In 2016 NGC hosted the Welsh Seniors Open Championship, we hosted the Ladies' Home Internationals in 2017 and in 2018 we hosted the Girls and Boys Welsh Championship.</p> <p>More recently we hosted the 2021 Welsh Ladies' Amateur Open and are due to host both the men's and ladies amateur open this summer.</p> <p>These events to name a few are a great asset to the Welsh golfing community and in addition to the wider Newport economic standing with most if not all competitors using local hotels and restaurants during their stay.</p>	<p>Noted</p>

<b>Other Comments</b>	
If land at Newport Golf Club is included in the Deposit Plan a developer will be appointed to support the allocation of the site and deliver the homes as soon as possible. The Golf Club needs to refurbish or redevelop the clubhouse and the funds raised are intended to enable the redevelopment.	Noted. The Deposit Plan will include a review of the urban and village boundaries.

**GSO 043 - National Gas Transmission - 00011 Other Comments**

<b>Question / Response</b>	<b>Officer Response</b>
<p>National Gas Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p><u>About National Gas Transmission</u> National Gas Transmission owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.</p> <p><u>Utilities Design Guidance</u> The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by National Gas Transmission infrastructure. National Gas Transmission advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines, underground gas transmission pipelines, and other National Gas Transmission assets.</p> <p><u>Further Advice</u> National Gas Transmission is happy to provide advice and guidance to the Council concerning their networks.</p> <p>Please see attached information outlining further guidance on development close to National Gas Transmission assets.</p> <p>If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.</p>	<p>Noted. We look forward to working collaboratively as our respect plans progress.</p>

<p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Gas Transmission wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Gas Transmission on any Development Plan Document (DPD) or site- specific proposals that could affect National Gas Transmission's assets.</p>	
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**GSO 044 - National Grid Electricity Transmission - 00847**

Question / Response	Officer Response					
<p>National Grid Electricity Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p><b><u>About National Grid Electricity Transmission</u></b></p> <p>National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.</p> <p>National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.</p> <p>National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.</p> <p><b><u>NGET assets within the Plan area</u></b></p> <p>Following a review of the above Development Plan Document, we have identified one or more NGET assets within the Plan area. Details of NGET assets are provided below.</p>	<p>Noted. We look forward to working collaboratively as our respect plans progress.</p>					
<table border="1"> <thead> <tr> <th data-bbox="91 1085 1377 1125">Asset Description</th> </tr> </thead> <tbody> <tr> <td data-bbox="91 1125 1377 1197">4YX ROUTE TWR (001 - 075): 400Kv Overhead Transmission Line route: CILFYNYDD - SEABANK - WHITSON Electrical Substation: IMPERIAL PARK 400KV</td> </tr> <tr> <td data-bbox="91 1197 1377 1268">400Kv Underground Cable route: IMPERIAL PARK - ST BRIDES SGT1B 400Kv Underground Cable route: IMPERIAL PARK - ST BRIDES SGT2B</td> </tr> <tr> <td data-bbox="91 1268 1377 1380">4YX ROUTE TWR (075 - 105): 400Kv Overhead Transmission Line route: CILFYNYDD - SEABANK - WHITSON XM ROUTE: 275Kv Overhead Transmission Line route: CARDIFF EAST - USKMOUTH - WHITSON</td> </tr> <tr> <td data-bbox="91 1380 1377 1417">Electrical Substation: WHITSON 275KV</td> </tr> </tbody> </table>	Asset Description	4YX ROUTE TWR (001 - 075): 400Kv Overhead Transmission Line route: CILFYNYDD - SEABANK - WHITSON Electrical Substation: IMPERIAL PARK 400KV	400Kv Underground Cable route: IMPERIAL PARK - ST BRIDES SGT1B 400Kv Underground Cable route: IMPERIAL PARK - ST BRIDES SGT2B	4YX ROUTE TWR (075 - 105): 400Kv Overhead Transmission Line route: CILFYNYDD - SEABANK - WHITSON XM ROUTE: 275Kv Overhead Transmission Line route: CARDIFF EAST - USKMOUTH - WHITSON	Electrical Substation: WHITSON 275KV	
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4YX ROUTE TWR (105 - 105A): 400Kv Overhead Transmission Line route: CILFYNYDD - SEABANK - WHITSON 33Kv Underground Cable route: LLANWERN BSC 33KV S/S
SD ROUTE: 33Kv Overhead Transmission Line route: LLANWERN - WHITSON SGT1 SE ROUTE: 33Kv Overhead Transmission Line route: LLANWERN - WHITSON SGT2
4YX ROUTE TWR (105 - 158): 400Kv Overhead Transmission Line route: CILFYNYDD - SEABANK - WHITSON XL ROUTE: 275Kv Overhead Transmission Line route: IRON ACTON - WHITSON 1
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XM ROUTE: 275Kv Overhead Transmission Line route: TREMORFA - USKMOUTH - WHITSON XR ROUTE: 275Kv Overhead Transmission Line route: USKMOUTH - WHITSON 1
XR ROUTE: 275Kv Overhead Transmission Line route: USKMOUTH - WHITSON 2

A plan showing details and locations of NGET's assets is attached to this letter. Please note that this plan is illustrative only. Please also see attached information outlining further guidance on development close to NGET assets.

Utilities Design Guidance

The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by NGET. NGET advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines and other NGET assets.

Further Advice

NGET is happy to provide advice and guidance to the Council concerning their networks. Please see attached information outlining further guidance on development close to National Grid assets. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, NGET wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets.

Question / Response	Officer Response
<p>Thank you for the opportunity to take part in this consultation, as the Council prepares its new Local Development Plan (LDP). We are glad to see references in the consultation document to the new LDP's objective, 'Equality, Diversity and Inclusion', about creating positive places "where Newport's culture, including the Welsh language, is valued and promoted".</p> <p>The Council should ensure that the new LDP is clear about how it will promote the Welsh language. We would like to draw your attention to a number of considerations regarding the Welsh language, as you work on the plan.</p> <p><u>Legislation and policy</u></p> <p>The Council should consider the following legislation and policies and how the LDP can promote the Welsh language in the field of planning:</p> <ul style="list-style-type: none"> <li>- Welsh Language (Wales) Measure 2011</li> <li>-Planning (Wales) Act 2015</li> <li>-Well-being of Future Generations (Wales) Act 2015</li> <li>-Technical Advice Note (TAN) 20: Planning and the Welsh Language (2017)</li> <li>-Cymraeg 2050: A million Welsh speakers (2017)</li> <li>-Planning Policy Wales (2021)</li> <li>-Future Wales: The National Plan 2040 (2021)</li> </ul> <p><u>Welsh language standards</u></p> <p>The Welsh Language Measure gives official status to the Welsh language in Wales and establishes the principle that the Welsh language should be treated no less favourably than the English language. The Measure created the Welsh language standards, which are used by the Commissioner to impose duties on organisations to use the Welsh language. We would like to draw your attention to the policy making standards, which place a duty on organisations to consider the effect of policy on the Welsh language. When preparing the new LDP, consideration should be given to the Commissioner's advice document, Policy Making Standards: Creating opportunities for persons to use the Welsh language and treating the Welsh language no less favourably than the English language.</p> <p>Another category of standards are the promotion standards, which place a duty on local authorities to produce and publish a 5-year strategy which explains how they intend to promote the Welsh language and facilitate its use more widely in their areas. The Commissioner has published two advice documents regarding this, Standards relating to promoting the Welsh language - 5-year strategies: a best practice guide for county and county borough councils and National Park authorities and Promotion standards: assessing the achievement of the 5-year strategies - Effective practice guidance document.</p> <p><u>The Council's strategies</u></p>	<p>Noted As part of this process the LDP team will continue to work with partners, during the preparation of the replacement LDP to ensure any amendments to policy reflect the opportunities identified.</p>

<p>The Council should consider its Welsh Language 5 Year Promotional Strategy for 2022- 2027 which it produced in line with the promotion standards placed upon it. It should also consider its Welsh in Education Strategic Plan (WESP) for 2022-2032. The new LDP should further the objectives of the Welsh Language Promotional Strategy and the WESP. In addition, the Council should explain how the LDP will contribute to meeting the strategy's target for increasing the number of Welsh speakers in the area.</p> <p><u>Conclusion</u></p> <p>In summary, consideration should be given to the legislation and policies listed above and the policy making standards and promotion standards placed on the Council, when drawing up the new LDP. The new LDP should state clearly how it will support the Welsh language and further the aims of the Welsh Language Promotional Strategy and the WESP. In addition, we ask the Council to ensure that it consults with local forums and stakeholders who are involved with the Welsh language, when preparing the LDP.</p>	
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**GSO 046 - Natural Resources Wales - 00004**

<b>Question / Response</b>	<b>Officer Response</b>
<p>We understand this is an informal consultation to inform the preferred strategy. As part of our role we aim to provide an indicative view on environmental issues we believe need to be considered as part of the submission.</p> <p>The 'Growth and Spatial Options' paper dated January 2023 presents a series of high-level growth and spatial options as an indication of how growth could be distributed across Newport. These are presented by six growth options which are assessed against current RLDP objectives.</p> <p>We note that the growth and spatial options appear to focus on delivery of housing and employment land as key drivers. We would encourage your Authority to consider growth in terms of Welsh Government's commitment to a Well-Being Economy. We recommend options be assessed against how they contribute to key challenges such as those identified in Future Wales, i.e. the climate and nature emergencies, against the Well-being of Future Generations goals, which provide a framework for encouraging inclusive growth, and the SMNR aim of a regenerative economy. (SONARR 2020).</p> <p>We would expect that these matters are given appropriate weighting as part of the Integrated Sustainability Appraisal (ISA), to demonstrate how the environmental, social and economic effects of the RLDP have been given due consideration.</p> <p>Notwithstanding the potential outcomes of the Integrated Sustainability Appraisal (ISA), we have a preference for options which would avoid negative impacts upon RLDP objectives relating to; Natural Resources, Biodiversity and Geodiversity, Landscape, Climate Change, Transport and Movement. These objectives should be given appropriate consideration and include details on safeguarding, maintaining and enhancement within the ISA.</p>	<p>Noted. This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.</p>

<p>We note reference in the assessment of spatial options (Appendix B) to mitigation impacts on the environment. We also note the emphasis on a stepwise approach in Planning Policy Wales (Chapter 6), with "avoiding" impacts being the first step, and mitigation being the last resort. We recommend careful consideration of how best to avoid environmental impacts when deciding upon the preferred growth and spatial options.</p> <p>In particular we would expect each growth option to have regard for the following topics:</p>	
<p><u>Flood Risk</u>  As you are aware a large area of Newport is at risk of tidal and fluvial flooding due to its coastal and riverside location. A Strategic Flood Consequence Assessment (SFCA) should be undertaken and inform any growth area, taking into account any current and future planned flood defences. We advise that any new proposed development will have to have regard to policy including TAN15 and any forthcoming replacements. We advise you to consider how any changes may affect the proposed growth areas. In addition, regard should be given to any area that could have an impact on watercourses (reens and ditches) within internal Drainage Board (IDB) which are maintained and managed by NRW to ensure water levels and reduce flood risk.</p> <p><u>Protected Species</u>  We understand the current proposals are still high-level and therefore specific details of any species present are currently unknown. However, regard should be given to both European Protected Species and Nationally Protected Species at all proposed locations. We would be happy to provide further observations at the candidate site stage and would be happy to collaborate with your internal ecologist in the early stages in terms of impact to biodiversity on any preferred growth option.</p> <p><u>Protected Sites</u>  We note that Newport has a series of protected sites most notably the River Usk Special Area of Conservation (SAC), the Severn Estuary Special Protection Area (SPA) and Ramsar site. Any proposals that have the potential to impact these sites should be subject to a Habitat Regulations Assessment (HRA). In addition, we note the Gwent Levels Sites of Special Scientific Interest (SSSI) network and Newport Wetlands National Nature Reserves (NNR). Any proposed development within or likely to affect these sites should be considered in more detail including potential impact, mitigation, and long-term compensation. Nine National Natural Resources are identified as part of policy 9 in areas where these issues are of national importance. The National Natural Resources indicate broad areas where nationally important ecological networks/green infrastructure exist as a basis for promoting action to protect and enhance biodiversity and improve the resilience of ecosystems and recognising the importance of strategic green infrastructure. The importance of these areas should be given particular attention when identifying development proposals.</p> <p><u>Green Infrastructure</u></p>	<p>Noted, the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers provide greater detail on this.</p> <p>As part of this process the LDP team will continue to work with partners, during the preparation of the replacement LDP to ensure any amendments to policy reflect the opportunities identified.</p>

<p>We strongly advise that the enhancement of green infrastructure and connected landscapes should be a key factor when considering any growth option. These spaces can provide not just environmental but also social, health and economic benefits. These spaces need to be considered at the early stages of development and should be integrated not just in the wider Newport environment, but regard should be given to cross-boundary linkages as well. We refer you to the South East Wales Statement for more details.</p> <p>Future Wales identifies key challenges, including the climate and nature emergencies, that it is committing to address through leveraging the planning system. SONaRR 2020 and SEAS, also identify the importance of the role spatial planning plays in meeting these challenges. The RLDP has a vital role in responding to the nature and climate emergencies, and we recommend these drivers are given appropriate emphasis when deciding upon the preferred growth and spatial options for the RLDP.</p> <p>We understand the RLDP consultation is in its early stages. When further considering is given to developing possible spatial options, such as strategic sites or new settlements, we would be pleased to work through constraints and opportunities to those options, before you enter into the Plan's Preferred Strategy phase.</p>	
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**GSO 047 - St. Modwen Developments Limited - 00648**

Question / Response	Officer Response
<p>Savills is instructed by St. Modwen Developments Limited ("SMDL") to make representations on the Newport Replacement Local Development Plan ("RLDP") Growth and Spatial Options consultation. Enclosed is a Comments Form, however, given the constraints of the form the substance of the comments are presented in this letter.</p> <p>As you will be aware, SMDL is promoting the residential led mixed used regeneration of Glan Llyn which sits on the former Llanwern Steelworks site. This is one of Newport's (and South Wales') key regeneration schemes and lies on a major gateway into South Wales. The site is previously developed (or brownfield) land and occupies a strategic and sustainable position. It is some 243 hectares in size and basically free from environmental designations and constraints. It has, however, been severely affected by its' industrial past.</p> <p>To date, SMDL together with an experienced project team have fostered excellent working relationships with key stakeholders and officers at Newport City Council ("NCC" or "the Council"). All parties recognise Glan Llyn as a clear local and regional priority for regeneration. Both SMDL and NCC also recognise that public sector assistance is needed to deliver the redevelopment of the site. Progress made to date demonstrates that a mixture of uses is possible and it is important that the site continues to feature as part of an allocated site in the RLDP.</p>	<p>Noted</p>

<p>To ensure that it does, the site was promoted as a Candidate Site in August 2021. The submission reinforced the sites' potential for further redevelopment and recommended that Glan Llyn's allocation within the Eastern Expansion Area ("EEA") is maintained in the RLDP as a specific regeneration allocation. Consultation responses were also provided to the Draft Vision, Issues and Objectives document in March 2022 and the Newport Housing Monitoring 2022 in July 2022 in which we emphasised the importance of Glan Llyn as a strategic housing delivery site and noted that, given the strategic nature of the site and the number of residential developers active at any one time, SMDL considered the level of delivery to be robust, and possibly even conservative, given the visibility on likely developer activity across remaining phases for the five year period.</p> <p>This letter has been prepared to provide some further explanation of Glan Llyn's credentials and commentary on the Growth and Spatial Options presented. It starts with the headlines of the current position and background, considers the current policy position before commenting on the growth and spatial options.</p>	
<p><u>Glan Llyn - current position and background</u></p> <p>The Glan Llyn scheme is a very significant regeneration project. The site (and the EEA that it forms part of) is one of the cornerstones of Newport's sustainable growth strategy.</p> <p>Outline planning permission ("OPP") was granted in April 2010 for the whole scheme (ref. 06/0471). The basic proposition is a new neighbourhood of approximately 4,000 new homes in a high quality (and transformed) environment, a local centre and a business park (now known as St. Modwen Park, formerly Celtic Business Park).</p> <p>The site is rectangular in shape with longer sides of approximately 2km and shorter sides of 1km. Its western boundary is formed by Newport Retail Park District Centre, its northern boundary by the Tata and main railway lines and its eastern boundary by the retained Tata Llanwern Steelworks. Its long southern boundary is formed by the Queensway (A4810).</p> <p>Development of the main new residential neighbourhoods falls into two main sub areas. The masterplan for the western area was approved in November 2010 and for the eastern area in February 2020.</p> <p>Applications (for the approval of reserved matters) have since been made and approved for a number of homes together with infrastructure that will serve them which is now in place. In addition, upgrades to the Queensway road to the south of the site has provided a major new link road.</p> <p>The scheme is expected to take about 20 years to complete, by which time it will have created or supported 6,000 jobs. Many of these will have come from the development of the new housing on the site. The project requires long term vision and long term commitment. SMDL has provided both. It is one of the UK's leading regeneration companies, acts as master developer and is responsible for installing the new hard and soft infrastructure and landscaping. SMDL has established a Management Company to maintain the new development. As a completely separate legal entity, St. Modwen Logistics ("SML") is developing most of the business park itself. Individual house builders, housing associations and other</p>	<p>Noted</p>

bodies will be responsible for the delivery of new homes across multiple phases. A new neighbourhood will transform this previously developed site and will include substantial new areas of open space and parkland, two new primary schools and a local centre.

SMDL is committed to the ongoing redevelopment of Glan Llyn development and the adjacent employment site. Reference is made to each of the sites under Policy H1 (Housing Sites), Policy EM1 (Employment Land Allocations), Policy SP10 (House Building Requirement) and Policy SP11 (Eastern Expansion Area) of the current adopted Local Development Plan (January 2015) ("LDP"). These policies capture the potential of the site to create a new residential led mixed use urban extension.

The successful delivery at Glan Llyn to date has been achieved in very difficult market conditions - especially at the beginning of the development process for a very large scheme. Very few other sites have made anything like the progress that Glan Llyn has in these conditions.

It is therefore entirely reasonable for NCC to continue to allocate the site for redevelopment in the RLDP (2021- 2036) and to expect rates of development to continue as economic conditions improve and further key milestones are made with the scheme. These will include the next phases of residential development, the construction and opening of the second primary school, the development of the central and eastern lakes, and construction and operation of the next phases of business units at St. Modwen Park by SML.

Regeneration of the site will also see one of Wales' largest previously developed sites recycled and transformed. This qualitative dimension of the scheme is just as important as the quantity of new housing and employment space that will be developed there.

#### Western and Eastern Sub Areas

The OPP for the site is based on a masterplan that shows how the development will be organised. The permission requires the agreement of a series of sub area masterplans.

The Western Sub Area extends to about 60 hectares and comprises the first 1,250 new homes split into five main development areas. As its name suggests, it includes the western part of the site next to the Newport

Retail Park District Centre (Spytty) and close to where the Queensway turns into Queensway Meadows before it meets the A48.

The majority of the Western Sub Area has been delivered including: tackling the ground conditions, structures and services from its industrial past; provision of new roads (including the site's gateway); the development of a number of homes (by various housebuilders) have been completed, or are underway, approved or in the planning pipeline; the first of the two primary schools for the development; the majority of Glan Llyn's green and blue grid of open space have been provided, including a large play and sports space, known as Western Park.

The Eastern Sub Area includes the remainder of the site up to its eastern boundary along to St. Modwen Park. It includes a number of phases for homes, together with the rest of the site's infrastructure and

<p>landscaping elements, including the central and eastern lakes, and Phase 3 of the Avenue Road which connects to the Queensway to the south, and Main Street to the south which connects to the Local Centre. The approval of the Eastern Sub Area masterplan unlocked the remainder of the site and has subsequently seen reserved matters approvals come forward for residential phases and other open space and infrastructure. There are a number of emerging proposals for the remaining phases of the Eastern Sub Area with a variety of housebuilders.</p> <p><u>Local Centre</u></p> <p>A separate sub area masterplan has been approved for the local centre which includes a range of retail, leisure, residential and community facilities to serve the wider Glan Llyn community. The local centre is accessed directly from a signal controlled junction on the Queensway. The infrastructure has been installed and the Marston's Llanwern Bull Pub and Restaurant is now open. Progress is ongoing on the delivery of other aspects to the local centre.</p> <p><u>St. Modwen Park (formerly Celtic Business Park)</u></p> <p>At the eastern end of the site, work on St. Modwen Park is underway by SML. This area also required its own sub area masterplan which was approved in 2015. The main road access has been approved and installed and the first four phases for business units have been approved, with some built and occupied and others expected to be constructed shortly. A Reserved Matters application for Phase 4 was approved in July 2021 and has been built out, delivering a further four business units (Units 4-7). Phase 5 was approved in March 2022, delivering three additional units (Units 8-10). Further Reserved Matters applications are expected to follow during 2023.</p>	
<p><u>Planning policy</u></p> <p><u>Local Development Plan</u></p> <p>The Glan Llyn concept responded to the closure of the former Llanwern Steelworks site. In its Unitary Development Plan ("UDP"), NCC allocated the former 'heavy end' of the steelworks and other land in the vicinity as the EEA. This allocation continues in the adopted LDP. The strategy of the LDP recognises that the EEA is integral to the city's growth strategy, and is underpinned by the allocation and delivery of the Glan Llyn regeneration site.</p> <p>Strategic Policy SP11 relates solely to the Eastern Expansion Area and states that:</p> <p>'The Eastern Expansion Area consists of the former Llanwern Steelworks regeneration site known as Glan Llyn H1(47) and EM1(vii), and housing sites at Llanwern Village H1(3), Hartridge High School H1(19) and Jigsaw Site H1(55). This Eastern Expansion Area is identified as a residential led mixed use, sustainable urban expansion area which will provide a range and choice of housing, employment land and community uses.'</p> <p>As well as supporting wider growth and regeneration ambitions, Glan Llyn helps NCC deliver its housing requirements in a sustainable way. The site provides 25% of the LDPs overall requirement to 2026 (and</p>	Noted



<p>the EEA contributes just under 40%). Glan Llyn will also contribute to longer term housing requirements beyond the current plan period.</p> <p><u>Future Wales - The National Plan 2040 (February 2021)</u></p> <p>Future Wales, through Policy 33 (National Growth Area - Cardiff, Newport and the Valleys), recognises "Cardiff, Newport and the Valleys will be the main focus for growth and investment in the South East region. Strategic and Local Development Plans should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure."</p> <p>The policy continues:</p> <p>"The Welsh Government supports an increased strategic role for Newport as a focus for sustainable, long term growth and investment. The Welsh Government will work with authorities within the region and in England to promote Newport's strategic role and ensure key investment decisions in Wales and England support Newport."</p> <p>It is therefore clear that, at a national level, the strategic and sustainable development of regeneration schemes such as Glan Llyn should have full support.</p> <p><u>Planning Policy Wales (Edition 11, February 2021)</u></p> <p>Planning Policy Wales ("PPW") is specific in recognising a sequence of site allocations that "prioritises the use of previously developed land and existing buildings." The site search and sequence for allocations is therefore clearly established.</p> <p>Paragraph 3.43 notes:</p> <p>"In developing their spatial strategy planning authorities must prioritise the use of suitable and sustainable previously developed land and/or underutilised sites for all types of development. When identifying sites in their development plans planning authorities should consider previously developed land and/or underutilised sites located within existing settlements in the first instance with sites on the edge of settlements considered at the next stage."</p> <p>Paragraph 3.55 adds:</p> <p>"Previously developed (also referred to as brownfield) land (see definition overleaf) should, wherever possible, be used in preference to greenfield sites where it is suitable for development."</p>	
<p><u>Comments on Growth and Spatial Options</u></p> <p>As a high level document, the RLDP's Growth and Spatial Options sets out six growth options and four spatial options. The options are informed by the current situation and key issues for the RLDP to address via its Preferred Strategy which is expected to itself be consulted upon in Autumn 2023. SMDL's general observations are set out below.</p> <p><u>Growth Options</u></p> <p>Page 5 of the document identifies "six realistic alternative options, which more align with Newport's national role as an area for growth." These are reproduced in Table 1 below.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

Table 1: Growth Options

Growth Option	Dwellings	Jobs
1. Dwelling-led 5YR	12,570	12,945
2. WG-2018- HIGHPOP	9,480	10,695
3. Dwelling-led 10YR	9,570	8,640
4. WG-2018- Principal	7,950	9,405
5. PG-Long Term	8,100	6,720
6. Employment-led OE+D	7,605	5,835

At this point in time, SMDL has limited observations on the overall Growth Options. However, it is helpful to recall that in the Newport Housing Land Availability Schedule 2022, NCC anticipates a total of 1,028 units will be delivered across Glan Llyn over the five year period 2023-27, equating to an average of 206 units per year. This comprises 723 units from Phases 2C, 3A, 3B/3D, 3C/4A and 2D (all of which have the benefit of Reserved Matters approval) and 305 units from future phases during the same five year period. While there has been an easing of market conditions during Q4 2022/Q1 2023, SMDL considers this level of delivery to remain robust given the visibility on likely developer activity across remaining phases for the five year period.

Since the Newport Housing Land Availability Schedule 2022 was consulted on in the summer of 2022, Bellway secured Reserved Matters approval for 212 units at Phase 4H in November 2022. Moreover, St. Modwen Homes has submitted and anticipates progress to be made in respect of securing Reserved Matters approval for Phases 4C and 4B/5D during 2023. Separately, a national housebuilder is expected to progress a Reserved Matters application for Phase 4D during 2023. All the above are expected to contribute to additional delivery rates towards the latter end of the five year period.

SMDL is mindful that the period for the submission of Reserved Matters against the OPP ends in April 2025. It is anticipated that many of these remaining phases (Phases 4G/4E, 5A/5B, 5E1/5E2, 5F and 5G) will secure Reserved Matters approval within this period or, should it be necessary, via an extension of time to the OPP. Under both scenarios, this will translate to further delivery across Glan Llyn during the RLDP plan period (2021-2036).

As a result, it is clear Glan Llyn is capable of making a significant contribution to the delivery of housing over the RLDP plan period which should be fully considered under all Growth Options.

Spatial Options

Appendix B of the document identifies four Spatial Options. These are Previously Developed Land (“PDL”)-led, Urban Expansion, Village Focus and Hybrid Approach. A summary of these options are reproduced in Table 2 below.

Table 2: Spatial Options

Spatial Option	Summary
PDL-led	▪ Continuation of the current spatial strategy.

Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.

	<ul style="list-style-type: none"> <li>▪ Focusing growth on previously developed land.</li> </ul>
	<ul style="list-style-type: none"> <li>▪ Requires high density development within the urban boundary</li> </ul>
	<ul style="list-style-type: none"> <li>▪ Explore the reuse of declining employment or industrial land for either housing or new types of employment uses.</li> </ul>
	<ul style="list-style-type: none"> <li>▪ Greenfield land should be avoided as far as possible.</li> </ul>
Urban Expansion	<ul style="list-style-type: none"> <li>▪ Identification of land on the edge of the urban boundary.</li> </ul>
	<ul style="list-style-type: none"> <li>▪ Likely to constitute a substantial amount of greenfield growth.</li> </ul>
	<ul style="list-style-type: none"> <li>▪ Land-based constraints may restrict the scale of growth.</li> </ul>
Village Focus	<ul style="list-style-type: none"> <li>▪ Direct housing development towards nine defined villages.</li> </ul>
	<ul style="list-style-type: none"> <li>▪ Some villages are more constrained than others – less constrained villages would support a high proportion of growth</li> </ul>
	<ul style="list-style-type: none"> <li>▪ Likely to result in a high amount of greenfield land consumption.</li> </ul>
	<ul style="list-style-type: none"> <li>▪ Unlikely to support a higher scale of growth due to land availability and the level of existing services and facilities</li> </ul>
Hybrid Approach	<ul style="list-style-type: none"> <li>▪ A mix of previously developed land, sites on the edge of the urban boundary and sites at and surrounding existing villages.</li> </ul>
	<ul style="list-style-type: none"> <li>▪ Able to draw upon the spatial benefits of the other options.</li> </ul>
	<ul style="list-style-type: none"> <li>▪ Difficult to balance growth across this option.</li> </ul>

Supported by national planning policy and demonstrated by the successful delivery of Glan Llyn to date, SMDL has been supportive of PDL-led approach. National planning policy, through Future Wales and PPW, encourage the prioritisation and re-use of PDL in identifying allocations. Newport’s industrial past has provided it with significant opportunities to capitalise and deliver growth via PDL, both in the past and into the future, as demonstrated by Glan Llyn.

It is therefore a concern to SMDL that neither Glan Llyn as a whole, or specifically the ‘balance’ to its delivery in its Eastern Sub Area, are identified as a “Broad location for New Housing Growth...” under any of the four Spatial Options as currently set out. Under the PDL-led Option, the land to the east of St. Modwen Park (currently occupied by TATA) is identified, however Glan Llyn itself is not.

SMDL assume this is because it seeks to identify ‘new’ growth and that Glan Llyn is now considered a commitment towards housing delivery with the benefit of OPP, as defined in the Development Plans Manual (Edition 3, March 2020). However, this is a concern to SMDL who request that Glan Llyn continues to be recognised as a housing allocation for the duration of the delivery of the site, which will continue into the RLDP plan period (2021-2036), in much the same way the current LDP does. Glan Llyn is recognised under the current LDP (as site H1(47)) and at the time of the current LDP’s adoption in January 2015 had OPP so in a similar scenario. The current LDP recognises the significance of Glan Llyn (and others) via its allocation and specific Policy SP11 (Eastern Expansion Area). NCC will be aware the period for the submission of Reserved Matters against the OPP ends in April 2025 and, while there are an

<p>increasing number of phases with Reserved Matters approval, a number of the phases are still to secure such. For this reason, SMDL consider it important the RLDP continues to expressly recognise and allocate Glan Llyn and recognise its importance via a regeneration policy given its ability to continue to make a significant contribution towards housing delivery over the plan period 2021-2036.</p>	
<p><u>Conclusion</u>  As stated at the beginning of this letter, SMDL seeks to reiterate Glan Llyn's importance as a key regeneration site to deliver the objectives of the RLDP under all Growth Options and Spatial Options presented. This reflects the planning position and delivery on site to date and the clear potential of the scheme to continue to provide a residential-led mixed use urban extension on PDL within the RLDP plan period of 2021-2036.  The scheme is a major sustainable regeneration initiative and is a true commitment - OPP has been granted, the site is in the hands of SMDL (an active and experienced development company), significant and substantial infrastructure has been installed and development is underway by multiple housebuilders. Glan Llyn continues to both warrant and need clear planning support and should be identified as a clear priority and objective for the RLDP via a specific allocation (in much the same way Policy SP11 (Eastern Expansion Area) performs in the current LDP).</p>	<p>Noted</p>

**GSO 048 - Linc Cymru and Melin Homes - 00571**

<b>Question / Response</b>	<b>Officer Response</b>
<p>Asbri Planning, on behalf of Linc Cymru and Melin Homes, wish to comment on the Replacement Local Development Plan (LDP) Growth and Spatial Options Paper (January 2023), which was issued for non-statutory consultation on 25th January 2023.  The Paper sets out growth and spatial options for the Replacement LDP, together with the implications of each option and the extent to which they will achieve the RLDP objectives - which will inform the Preferred Strategy that will be delivered by the RLDP.  This letter has been prepared in the context of land which is being promoted by Joint Site Promoters (Linc Cymru and Melin Homes) at 'Land at Gorelands, Langstone', for which a Candidate Site representation was submitted to the Authority in July 2021.</p>	<p>Noted. Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>
<p><u>Consideration of Growth Options</u>  Since the adoption of the current LDP (2011-2026) in 2015, the national planning policy context has undergone a number of changes. Of particular importance in terms of implications for the Newport Replacement LDP is the publication of Future Wales: The National Plan 2040 (published 24th February 2021). Future Wales forms the 'National Development Framework for Wales' and is the highest tier of the development plan in Wales. As acknowledged within the Growth and Spatial Options Paper, Future Wales "provides a spatial framework for the provision of new infrastructure/growth and seeks to</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

manage development and the use of land through the planning system, in line with key national priorities in the public interest". The content of Future Wales is therefore of key importance in developing the Replacement LDP's growth and spatial options.

Newport is identified within Future Wales as a 'National Growth Area'. Policy 33 - National Growth Area - Cardiff, Newport and the Valleys of sets out that "Cardiff, Newport and the Valleys will be the main focus for growth and investment in the South East region". Supporting text to Policy 33 sets out at Page 165 that "The Welsh Government is determined to see development and growth in Newport, allowing the city to fulfil its potential as a second focal point for the region".

In light of the above, it is essential that the growth strategy of the Replacement LDP aligns with Newport's national role as an area for growth.

The Growth and Spatial Options Paper (January 2023) outlines and assesses six potential growth options. The current/adopted LDP growth strategy is based upon the delivery of 690 dwellings per annum. In light of Newport's National Growth Area status, the level of growth proposed for the replacement LDP cannot fall below the current LDP growth. If a lower growth option is proposed than that on which the current plan is based, the replacement plan would not reflect Newport's nationally important role (as identified by Welsh Government in the highest tier of the Development Plan).

Any growth option which is set at level below 690 dwellings per annum would effectively result in a plan which fails to meet the tests of soundness - in particular, Soundness Test 1 would not be met as the replacement LDP would not be consistent with other plans (i.e. Future Wales).

The only growth option presented within the Growth and Spatial Options Paper which delivers a level of housing growth above the current LDP strategy of 690 dwelling per annum is 'Option 1 - Dwelling-Led 5yr', which is based on a growth level of 838 dwellings per annum. As highlighted within the table below, all other growth options (options 2-6) are based upon a growth level which falls below the current/adopted LDP.

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 population figure and incorporating high fertility, mortality and migration assumptions.	632	9,480	713	10,695
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+DBI 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

As such, in the context of the Newport's national role as an area for growth, Option 1 is supported as the only appropriate growth option to allow for its growth area status to be delivered. Option 1 is a high growth option, resulting in an annual requirement for 838 new homes and 863 new jobs - the overall requirement would equate to 12,570 new homes and 12,945 new jobs over the period 2021-2036 (reflecting Newport's nationally important role identified by Future Wales).

#### Consideration of Spatial Options

The growth strategy of the current/adopted LDP (2011-2026) has focussed heavily on large brownfield sites in and around Newport. The LDP Review Report (April 2021) sets out that 94% of housing has been delivered on previously developed land since the adoption of the LDP (in 2015). Paragraph 4.14 of the Review Report highlights that "It is not clear whether future levels of growth can be accommodated predominantly on previously developed land over the next plan period".

In light of the above, a need is now identified for suitable greenfield sites given that the majority of brownfield opportunities within the area have been exhausted. In light of the limited availability of remaining suitable brownfield land, it is considered that a spatial distribution option which continues to focus on brownfield sites will fail to meet projected needs across the life of the replacement plan period. The Growth and Spatial Option Paper sets out five spatial distribution options. It is stated that these options "have been derived through an application of national policy principles with relation to prioritising the reuse of previously developed land". However, as set out above, the spatial distribution option needs to be considered firmly in the context of previously developed land forming a finite resource (with 94% of all housing in Newport being delivered on brownfield land since the current LDP was adopted).

The first growth option set out within the Growth and Spatial Options paper is based on a "Previously Developed Land (PDL) Led" approach which would "constitute a continuation of the current spatial

Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.

strategy, focusing growth on previously developed land". It is considered that a PDL-led option is entirely inappropriate for future growth within Newport, requiring high density development within the urban boundary restricted to the reuse of declining employment or industrial land.

Reverting back to the critical importance of ensuring future growth levels reflect the objectives of Future Wales, in recognising Newport's identification as a National Growth Area, a PDL-led option will significantly limit the ability of the plan to fulfil this strategic role if there is a lack of suitable sites.

Furthermore, a large proportion of remaining PDL land is located within areas subject to flood risk - further restricting the ability of PDL land to deliver the level of necessary growth. A particular point, which we would highlight as critical to the delivery of housing is the likely limitation on the variety of housing types that can be delivered by the PDL-led approach, recognising the likely financial viability constraints utilising PDL land within the existing settlement boundaries.

In summary, in light of the above, the "Previously Developed Land (PDL) Led" spatial option is not supported. It is considered that the Replacement LDP, if progressed on this basis, will be fundamentally unsound. Specifically, the plan would fail Soundness Test 3 (Will the plan deliver) - as clearly the plan will be ineffective.

The second spatial option set out within the Growth and Spatial Options paper is an "Urban Expansion" based approach. The paper sets out that "Taking an urban expansion approach would require the identification of land on the edge of the urban boundary. This is likely to constitute a substantial amount of greenfield growth". It is considered that the Replacement plan will need to be underpinned by a spatial option which constitutes greenfield growth to allow for the necessary level of growth to be delivered - as the Growth and Spatial Options paper clearly states "Urban expansion would allow greater capacity to try and meet the levels of regional growth and investment expected as part of Newport's National Growth Area designation". The potential challenges posed by an Urban Expansion strategy are acknowledged, for example with regards to sustainable travel. However, the Replacement LDP should look to greenfield sites which present options to increase the use of sustainable travel options (including sites positioned on the edge of existing settlements such as the Candidate Site at 'Land at Gorelands, Langstone' which, although a greenfield site, is located within a short walk of locally accessible services and facilities and sustainable modes of public transport within Langstone Village).

There are a number of benefits associated with the urban expansion approach to growth, which are acknowledged within the Growth and Spatial Options Paper - of particular importance in terms of the delivery of housing within Newport over the replacement LDP period are the following:

- o Sites identified for urban expansion would be likely to have a greater capacity to provide a variety of housing types and compositions to support a balanced and sustainable community, as well as the numbers required to meet national policy.

<ul style="list-style-type: none"> <li>o Sites identified for urban expansion would be likely to have a greater capacity to provide the social, environmental, cultural and physical infrastructure required to support the needs of these areas, as well as any existing urban areas nearby.</li> <li>o Opportunity to deliver high quality homes to the highest sustainability and construction standards.</li> </ul> <p>In summary, the "Urban Expansion" based spatial option is supported, as this presents the only realistic option for meeting the levels of regional growth and investment expected as part of Newport's National Growth Area designation.</p> <p>The third spatial option set out within the Growth and Spatial Options paper is a "Village Focus" based approach, which would look to direct housing development towards nine defined villages (Castleton and Marshfield; St Brides; Bishton; Llanwern; Underwood; Llanvaches; Parc Seymour; Christchurch and Caerleon). This option is not supported as it will not support a higher scale of growth due to land availability, and will not adequately accommodate the levels of regional growth and investment expected as part of Newport's National Growth Area designation. As such, the "Village Focus" based approach is not supported.</p> <p>A final option is presented (the "Hybrid Approach") which represents a mix of previously developed land; sites on the edge of the urban boundary; and sites at and surrounding existing villages. Although this option allows for the key benefits of each spatial option to be exploited, the Hybrid Approach is not supported as it is considered that any strategy which relies to any degree upon previously developed land is unrobust. As the Growth and Spatial Options paper states in assessing the Hybrid Approach "Given PDL land is finite, it may not meaningfully contribute towards meeting the projected needs across the full 15-year life of the plan".</p>	
<p><u>Summary</u></p> <p>Upon reviewing the Growth and Spatial Options Paper (January 2023), it is concluded that the following options are supported:</p> <ul style="list-style-type: none"> <li>o Growth Option: Option 1 - Dwelling-Led 5yr</li> <li>o Spatial Option: 'Urban Expansion' based approach</li> </ul>	Noted

**GSO 049 - The Church Commissioners For England - 00639**

Question / Response	Officer Response
<p><b>GROWTH OPTIONS:</b></p> <p><b>Growth Scenarios -</b></p> <p><b>1. Are there any scenarios that have been discounted which should be considered further, and why?</b></p> <p><b>2. Which of the options do you feel is the most appropriate, and why?</b></p> <p><b>Assessment of Growth Options Against RLDP Objectives -</b></p>	



<b>3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</b>	
<p>On behalf of our client, the Church Commissioners for England (CCE), we enclose representation to the Newport Replacement Local Development Plan (RLDP) Growth and Spatial Options document. CCE is a registered charity that supports the work and mission of the Church of England across the country. Its investment policy is to hold a diverse portfolio of investments across a broad range of asset classes consistent with its ethical guidelines. Its Strategic Land team brings forward land for new housing developments with the aim of delivering new homes and employment opportunities which support and enhance the local community. Many new developments also include new schools, community facilities, new areas of open space, including new country parks, which benefit not only new residents but also neighbouring communities.</p> <p>CCE own land in Newport, to the north of the village of Caerleon, extending to circa 130 hectares. The site was put forward in the Call for Candidate Sites in August 2021, and representations were made to the RLDP Draft Vision, Issues and Objectives document in March 2022.</p>	<p>Noted</p> <p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>
<p>Future Wales: The National Plan 2040 identifies Newport as a National Growth Area, towards which strategic economic and housing growth should be focused. CCE welcomes the opportunity to work with the Council to achieve the growth necessary to meet the needs of Newport as a National Growth Area and supports in principle the growth options in the consultation document. In particular, CCE considers that the most appropriate option for growth is Option 1, dwelling-led five year. This option results in the highest number of both dwellings and jobs of the six options presented.</p> <p>The Newport City Council LDP Demographics report (September 2022) states that Newport's population increased 9.5% in the ten years between the 2011 to 2021 Census. This growth is significantly higher than the regional (2.9%) and national (1.4%) growth and must be supported by planning for an appropriate number of dwellings and jobs. The report also acknowledges that annual population growth in Newport has been influenced by the rate at which new homes have been built, therefore supporting the dwelling-led approach as the most appropriate option for growth.</p> <p>Option 1 also results in the highest job growth, which is critical to support Newport as a National Growth Area and enhance its economic role in Wales. This would reduce the reliance on outward commuting for work, and new development in rural areas would support jobs in these locations.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p>CCE's land at Caerleon provides an opportunity to deliver both dwellings and jobs in Newport. The circa 130-hectare site could deliver a new sustainable garden village development, including affordable homes, employment land, social and community infrastructure and a new local centre. The consultation document acknowledges that option 1 would support the RLDP's Economy and Employment, Population and Communities, Health and Well-being, and Equality, Diversity, and Inclusion objectives. The development of a garden village at CCE's land at Caerleon could make a substantial contribution to meeting these objectives, as well as other RLDP objectives.</p>	<p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>

<p>For example, CCE's land would also support the Transport and Movement and Climate Change objectives. The site is of a scale to be considered a standalone community and residents would be able to meet the majority of day-to-day needs on site. It is, however, also within walking distance of Caerleon and cycling distance of Newport city centre, making it a highly sustainable development location.</p>	
<p><b>EMPLOYMENT LAND OPTIONS:</b>  <b>Recommendation One -</b>  <b>4. Is this requirement appropriate for Newport?</b>  <b>5. Should it be different and if so, why?</b>  <b>Recommendation Two -</b>  <b>6. Should some sites be removed from the employment supply? Why?</b>  <b>7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.</b></p>	
<p>An employment land requirement of 77ha (recommendation one) is generally considered appropriate for Newport, however CCE would emphasise the need to ensure flexibility so that employment land requirements are in line with the growth and spatial options taken forward in the RLDP. Higher scales of employment growth would be appropriate to support Newport as a National Growth Area, and therefore would likely require more employment land to be supported by the plan. This should not be restricted by the RLDP, as it could provide new and enhanced economic opportunities, and attract new skills and businesses to Newport.</p> <p>With regards recommendation two, CCE considers that it may be appropriate to remove some sites from the employment supply to ensure that new employment land comes forward in the most appropriate locations based on the RLDP's new spatial strategy. This will ensure the Economy and Employment objective is met, offering a range of new and improved employment opportunities over the plan period.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><b>SPATIAL OPTIONS:</b>  <b>8. Which of these options do you feel is the most appropriate, and why?</b>  <b>9. Are there any other spatial distributions that should be considered, and if so, why?</b>  <b>10. Are there any other matters that should be given consideration when assessing these?</b></p>	
<p>CCE considers that the 'hybrid approach', including a mix of sites at and surrounding existing villages, previously developed land, and sites on the edge of the urban boundary, is the most appropriate spatial option for the RLDP. A hybrid approach would allow flexibility and support Newport's strategic designation as a National Growth Area. It will ensure development comes forward in the most sustainable locations including brownfield sites, whilst recognising that greenfield sites can also offer sustainable development opportunities.</p> <p>CCE's land at Caerleon provides an opportunity to develop a sustainable garden village to contribute to growth through a hybrid spatial strategy. It is of a scale to provide a range of housing types and tenures, including affordable housing, as well as the infrastructure required to support the community, including a local centre and employment opportunities. Its location is highly sustainable, with the eastern parts of</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.</p>

<p>the site within a 1.3km walk of Caerleon, and the western boundary less than 1km from the built-up area of Newport city centre via an existing direct cycle route, therefore promoting active travel.</p> <p>When assessed against the RLDP objectives, the consultation document states that the hybrid approach is likely to have an adverse impact on the current air quality management areas contrary to policy. CCE agrees that air quality should be a fundamental consideration for the spatial options. Air quality in Caerleon is an issue due to traffic congestion along the one-way system and narrow streets, and therefore Caerleon is particularly suited to any improvements which would help alleviate air quality issues in the area. Vehicular access to CCE's site is anticipated to form a new road between the A4042 and the B4236 which, in addition to providing access to the site, would have wider local benefits by reducing traffic pressure through Malpas and central Caerleon, in turn contributing to improving air quality in the area. CCE's land at Caerleon brings further opportunity to assist in improving air quality in the village as its development could support the opening of a new train station in Caerleon, a key aspiration of the Welsh Government. The size and positioning of the site would increase the demand for local rail services and help in supporting long-term viability of the service. The proposal site could also generate the case for increasing the frequency of current rail services on the route between Cwmbran and Newport Stations (the Welsh Marches Line), supporting the RLDP objectives of increasing the use and provision of sustainable travel options.</p> <p>As part of a hybrid spatial strategy, the Council should consider allocating land for garden villages, such as CCE's land at Caerleon, to ensure suitable, viable and deliverable sites come forward to meet the need for new housing over the plan period.</p>	
<p><b>EVIDENCE BASE:</b></p> <p><b>11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</b></p> <p><b>12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</b></p>	
<p>CE generally supports the objectives identified for the RLDP. Specifically, it strongly supports the Population and Communities objective to deliver high quality homes supported by necessary social, environmental, cultural and physical infrastructure. Development of its land at Caerleon for a garden village could make a substantial contribution to meeting this objective.</p> <p>Whilst CCE generally supports the Transport and Movement objective, in line with our earlier comments on air quality, it is considered that the objective should be bolstered to consider strategic solutions to address air quality issues, including a new rail station in Caerleon which a garden village at CCE's site could help support.</p>	<p>Noted</p>
<p><b>Other Comments</b></p> <p>CCE's site represents an opportunity to provide a garden village to the north of Caerleon. The provision of housing (a proportion of which will be affordable), the creation of ancillary employment generating</p>	<p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can</p>

<p>uses, and the green infrastructure that will be included on site represent significant environmental, social, cultural and economic advantages. The proposals would be well contained due to the existing topography and the natural site boundaries. The site is within a sustainable location with good opportunities for walking and cycling in the local area as well as diverting/extending existing public transport services into the site.</p>	<p>be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>
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**GSO 050 - Associated British Port - 00435**

Question / Response	Officer Response
<p><b>GROWTH OPTIONS:</b>  <b>Growth Scenarios -</b>  <b>1. Are there any scenarios that have been discounted which should be considered further, and why?</b>  <b>2. Which of the options do you feel is the most appropriate, and why?</b>  <b>Assessment of Growth Options Against RLDP Objectives -</b>  <b>3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</b></p> <p>Associated British Ports (ABP) supports the approach that the scale and location of new housing and employment in the Replacement Local Development Plan (RLDP) should reflect Newport's nationally important role as identified in Future Wales: The National Plan for 2040.</p> <p>As part of its draft Vision, Issues and Objectives RLDP consultation, the Council has already recognised the Port of Newport (referred to in adopted policy as Newport Docks) as an important economic asset for the area, playing a long-standing role in the local economy which supports a wide range of port-related businesses, and the jobs that those activities generate - both on site and through its wider supply chain. ABP, as owners of the Docks who are continually looking to improve and expand its facilities in Newport, therefore support the more ambitious approach taken to both housing and job growth set out in Options 1-4.</p> <p>In ABP's view, to provide consistent messaging to the market, both in terms of housing building investment and to potential new businesses coming to the area considering the available labour force, adopting a scale of housing growth closer to the current LDP target of 690 dpa would represent a pragmatic basis for plan making purposes.</p>	<p>Noted</p>
<p><b>EMPLOYMENT LAND OPTIONS:</b>  <b>Recommendation One -</b>  <b>4. Is this requirement appropriate for Newport?</b>  <b>5. Should it be different and if so, why?</b>  <b>Recommendation Two -</b>  <b>6. Should some sites be removed from the employment supply? Why?</b>  <b>7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.</b></p>	

<p>Recommendation One ABP agree that the demand requirement of 77ha over the plan period is appropriate. The inclusion of the additional demand identified in the Regional Employment Study as part of Newport's requirement is welcomed as this reflects the larger than local role that Newport plays in supporting economic activity across the region.</p> <p>Recommendation Two ABP does not have any comment on the specific sites identified within the employment supply but notes that, in line with the approach taken in the adopted LDP, the Newport Docks should continue to be allocated by a complementary employment policy which recognises the contribution it makes to economic activity in Newport.</p> <p>In addition to its existing role of bulk handling, warehousing and storage, the Docks provides unique opportunities by virtue of its deep water access and surrounding hinterland to support green energy transition projects which, as well as proving increasingly important to attracting job-creating business and investment, will assist in the delivering the RLDP's emerging climate change objectives. ABP's recently published sustainability strategy Ready for Tomorrow sets out the extent of our ambitions in this regard; as Wales's premier industrial port, ABP sees Newport as integral in delivering these objectives and looks forward to working closely with the Council's officers to ensure that its aspirations can aligned with those of emerging RLDP.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><b>SPATIAL OPTIONS:</b></p> <p><b>8. Which of these options do you feel is the most appropriate, and why?</b></p> <p><b>9. Are there any other spatial distributions that should considered, and if so, why?</b></p> <p><b>10. Are there any other matters that should be given consideration when assessing these?</b></p>	
<p>ABP does not have a particular comment on the spatial options set out in the consultation other than to welcome the continued designation of the Docks within the Newport urban area.</p>	<p>Noted</p>
<p><b>EVIDENCE BASE:</b></p> <p><b>11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</b></p> <p><b>12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</b></p>	
<p>ABP support the Economy and Employment objective set out in Appendix A of the consultation document, and in line with contents of the previous Vision, Issues and Objectives consultation, we restate the comments made on our behalf that we support the recognition that the Council has given to the economic importance of the Docks.</p> <p>As part of the objective to offer a 'diverse range and choice of new and improved employment activities', the Newport Docks, and ABP's ambitions for them in the transition towards a green economy means that over the RLDP period, has the ability to play a key role in supporting this diversification.</p>	<p>Noted</p>
<p><b>Other Comments</b></p>	

<p>ABP is currently in the process of developing a long-term masterplan for the port. We welcome continued engagement with officers as they develop the RLDP so that we can ensure that our emerging aspirations can be best aligned with and mutually reinforcing of the new local plan.</p>	<p>Noted As part of this process the LDP team will continue to work with partners, during the preparation of the replacement LDP to ensure any amendments to policy reflect the opportunities identified.</p>
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**GSO 051 - TATA Steel Ltd - 00170**

Question / Response	Officer Response
<p><b>GROWTH OPTIONS:</b>  <b>Growth Scenarios -</b>  <b>1. Are there any scenarios that have been discounted which should be considered further, and why?</b>  <b>2. Which of the options do you feel is the most appropriate, and why?</b>  <b>Assessment of Growth Options Against RLDP Objectives -</b>  <b>3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</b></p>	
<p>1. The growth scenarios which the Council has now discounted should not be subject to further consideration. A majority of the scenarios discounted represent levels of growth significantly below that set out in the adopted LDP. The Growth and Spatial Options Paper correctly concludes that such scenarios fail to reflect Newport's expected role as a focus for growth (as required by Future Wales). Low scale growth options of that nature would therefore fail to conform with national planning policy. We are also supportive of discounting scenarios that are only marginally different and ask the Council to only take forward the higher scale of growth for consideration in the consultation paper.</p> <p>2. Newport forms part of a National Growth Area (along with Cardiff and the Valleys), as identified by Policy 33 of Future Wales. The consultation paper correctly notes that it is incumbent on the Replacement LDP to recognise that the National Growth Area must be a focus for strategic economic and housing growth. Specifically relating to Newport, Policy 33 of Future Wales states that the Welsh Government supports an increased strategic role for Newport as a focus for sustainable, long-term growth and investment.</p> <p>In this context, it is essential that the Replacement LDP takes forward ambitious options for housing and job growth options. This will be critical if Newport is to see a step change in its strategic role in South Wales and beyond. Taking the six growth options put forward, only Option 1 represents a more ambitious level of growth than the adopted LDP (in terms of housing growth at least). Whilst Options 2, 3 and 4 present higher levels of job growth than the adopted LDP, they all propose lower levels of housing growth.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

<p>Therefore, it is clear that Option 1 is the most appropriate option presented. This option represents the most ambitious growth scenario for both new homes and jobs. It also provides the greatest opportunity to achieve the strategic economic and housing growth required by Future Wales.</p> <p>3. We have no specific comments to make in respect of Question 3.</p>	
<p><b>EMPLOYMENT LAND OPTIONS:</b></p> <p><b>Recommendation One -</b></p> <p><b>4. Is this requirement appropriate for Newport?</b></p> <p><b>5. Should it be different and if so, why?</b></p> <p><b>Recommendation Two -</b></p> <p><b>6. Should some sites be removed from the employment supply? Why?</b></p> <p><b>7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.</b></p>	
<p>4 and 5. We agree with the concerns raised in relation to basing the requirement on the Oxford Economics projections, which appear to underestimate likely growth. The resultant negative need for employment land and low levels of need under 'growth only' scenarios would clearly fail to deliver 'sustainable, long-term growth and investment' for Newport. As a result, Newport would fall short of the strategic role required by Future Wales.</p> <p>It is therefore appropriate for the Council to adopt a more ambitious requirement (as proposed in the consultation paper), which supports a higher forecast need to meet changing sectoral needs. It is also appropriate for the requirement to include a buffer to enable flexibility, which as stated in the Employment Land Review (ELR), will enable choice in the market and fluctuations in growth. The inclusion of an uplift to reflect regional employment demand is also supported.</p> <p>As recognised in the ELR, no forecast method is exact and ideal for all circumstances. It is therefore appropriate and important to build in flexibility to the employment land requirement. It is also important that wider policies in the Replacement LDP provide flexibility to enable agility in responding to future market demand over the plan period.</p> <p>6. We do not wish to comment at this stage on whether individual sites identified within the ELR should be removed from the identified employment supply. We would, however, encourage the Council to consider this further as the plan emerges. Should it be deemed appropriate to remove land from the supply, this should be clearly evidenced through later stages of the plan.</p> <p>It is noted that the ELR indicates that available land at the Eastman/Solutia site is likely to be linked to expansion of the Eastman firm itself. If that is the case, and land is only likely to be available to facilitate the expansion of the existing use, at a minimum reference should be made to this point, and the site is not available for other general employment needs.</p> <p>Whilst not specifically asked by this question, we would ask that a significant area of land (c.157.8 ha) within our client's (Tata Steel) control to the south of Queensway be added, rather than removed from the employment supply. This point is specifically returned to later in this response.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

<p>7. We have no specific comments to make in respect of Question 7.</p>	
<p><b>SPATIAL OPTIONS:</b></p> <p><b>8. Which of these options do you feel is the most appropriate, and why?</b></p> <p><b>9. Are there any other spatial distributions that should be considered, and if so, why?</b></p> <p><b>10. Are there any other matters that should be given consideration when assessing these?</b></p>	
<p><u>8.</u> Our client (Tata Steel) advocates the role of previously developed land (PDL) in the delivery of new growth in Newport, particularly in relation to new employment development. The importance of such sites must be reflected in the spatial distribution of new growth to be set out in later stages of the plan. As previously advocated by our client in response to the 'Draft Vision, Issues and Objectives' consultation, specific sites (i.e. opportunities of significant scale/potential) should be explicitly recognised and supported via specific policies within the LDP. This will provide greater certainty, help to realise the strategic economic growth and investment and support the positive delivery of such sites. Whilst PDL will make a significant contribution across the plan period, in order to deliver the scale of growth required, development will also be needed on the edge of existing urban areas and through the expansion of the most sustainable villages. We therefore support a hybrid approach to spatial distribution.</p> <p>Whilst supporting the general principle of a hybrid approach, the actual spatial distribution will be important and sufficient emphasis must be placed on the potential of PDL first and foremost, whilst directing additional growth to the edge of urban areas and the most sustainable villages. There is a danger that taking forward a solely PDL led approach (and restricting greenfield development) will place undue pressure on the existing supply of employment/industrial land (i.e. by increasing pressure to use employment land for other uses).</p> <p><u>9.</u> We have no specific comments to make in respect of Question 9.</p> <p><u>10.</u> We have no specific comments to make in respect of Question 10.</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.</p>
<p><b>EVIDENCE BASE:</b></p> <p><b>11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</b></p> <p><b>12. Are there any other comments you'd like to make regarding anything within this consultation document?</b></p>	
<p><u>11.</u> There are no additional pieces of evidence that our client wishes to identify at this stage. We do, however, have concerns with the ELR prepared in support of this paper. This is addressed in more detail below - but in short, the ELR fails to reference a significant area of land owned by our client which is available for employment development within the plan period to the south of Queensway. Whilst this is not an additional piece of evidence per se, our client would like to see the ELR reviewed/updated to reflect Tata's land holdings at Llanwern more accurately - both to the north and south of Queensway.</p> <p><u>12.</u> Our client wishes to make further comments in relation to the ELR and how its findings then translate to the employment land supply set out in the consultation paper.</p>	<p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>



Tata Steel submitted two separate parcels of land within its control through the candidate site process in August 2021.

1. Land to the north of Queen's Way (A4810), Newport (262 ha)
2. Land to the south of Queen's Way (A4810), Newport (132 ha)

Whilst the ELR refers to the existing Llanwern Steel Works site in its assessment of 'Existing Employment Areas' (Table 13), this relates solely to land to the north of Queensway. No reference is made to the land within Tata's control to the south of Queensway, either as an 'Existing Employment Area' or elsewhere in the ELR. This is despite the land being specifically put forward through the candidate site process in August 2021.

The assessment of land within the ELR identifies a total of 218.9 ha being available for B class uses. This includes existing allocations in the adopted LDP, land within existing employment areas and the Docks. No account is made for either of Tata's land parcels within this figure. As a result, the assessment of land available within Newport for B class uses (218.9 ha, including 55.4 ha at the Docks) is an underestimation of the supply actually available. As per our candidate site submission, there is a further 132 ha of land (c.99.7 ha net) within Tata's control to the south of Queensway that will be available for employment development over the plan period.

As per our submission to the candidate site process, Tata Steel would like to see specific reference/account taken of its landholdings at Llanwern within the Replacement LDP. This is addressed in further detail below, taking each parcel of land separately.

#### Land north of the Queensway

The site comprises c.116 ha of existing steel related uses. The site also includes a further c.126 ha of under-utilised land.

The existing steel operations at the site will continue. There are, however, opportunities for further steel related high quality business, storage, logistics and manufacturing floorspace (Class B1, B2 and B8) over the plan period to accommodate Tata Steel operations and/or other downstream businesses. There is also potential to accommodate a broader range of steel related and other complementary uses within the site. This could include uses such as energy/renewable energy (including use of the now closed waste landfill), research and development campus/hub (in conjunction with higher education facilities) and rail/road facilities (utilising the direct access to the UK rail network which adjoins the site to the north and to which the site benefits from direct rail access).

Given the extent of the site, Tata Steel is considering opportunities to enhance its capability at Llanwern by investing in further manufacturing plant or relocating some of its down-stream businesses here. Tata Steel is also interested in exploring complementary developments that further utilise the existing direct connection to the UK rail network. In this context, Tata Steel would expect to have seen wider reference to its land north of Queensway in the ELR - in a similar way to how the Docks is referenced, i.e.

recognising that land is available, whilst noting it is likely to be used for predominantly Tata Steel operations and/or other downstream/related businesses.

Whilst the site is currently within the urban boundary identified in the adopted LDP, it is not subject to any other specific designation or allocation. Tata Steel would like to see a specific policy included in the Replacement LDP to recognise (1) the importance and status of the existing Steel Works and (2) the significant potential for further steel related and other complementary uses at the site. Recognition in a specific 'regeneration' policy would confirm the status and potential of the site over the plan period. As per our candidate site submission, Tata requests the inclusion of a specific policy as follows:

"Policy XX: Llanwern Steel Works

The existing 262 hectare employment site at Llanwern Steel Works is protected for Class B1, B2 and B8 uses and wider/ancillary uses supporting the operational steelworks. The Council will support new steel related uses as part of a 'steel hub' at Llanwern. The Council also supports other complementary uses at the site where it is demonstrated that the development would be supportive of the operational use as a Steel Works."

Land south of Queensway, Llanwern

The site extends to 132 ha and forms part of the existing Llanwern Steel Works. The site currently accommodates a range of existing industrial uses, including: Tarmac (asphalt and concrete plant), Civil & Marine (concrete batching plant), Wedge Group (galvanising plant) and Air Products (industrial gas plant). The site also accommodates a network of reed bed treatment systems, settlement lagoons, material storage areas, waste treatment areas and landfills.

Tata Steel is currently undertaking a programme of remediation combined with development enabling works in order to bring disused or under-utilised areas of the site back into beneficial use. These are projected to run until 2027 and will see parcels of land sequentially made available up to, throughout and beyond that period. These works include:

- Active remediation of soils affected by diesel and waste oil contamination at the former plant maintenance facility;
- Capping of landfills (with the addition of solar panels to the capped areas);
- Crushing and grading of unsorted slag materials for re-use as fill materials on site;
- Use of stockpiled dredged soils for use in capping the landfill on the adjacent operational steel works site;
- Landscaping works; and
- Infrastructure improvements and renewals.

The site is capable of accommodating a range of uses, including new high quality business, storage, logistics and manufacturing floorspace (Class B1, B2 and B8). There is also potential to accommodate a broader range of complementary uses within the site. This could include uses such as energy/renewable energy, filming/production studios or a research and development campus/hub (in conjunction with

higher education facilities). The mix of uses will be determined by market demand as the proposals are brought forward. Existing uses on the site are currently subject to ongoing short - term leases, the longest of which lasts to 2027. The future use of those leasehold parcels of land will be reviewed subject to discussions with the existing tenants.

The site has the potential to provide a net developable area of c.99.7 ha. This excludes areas forming part of the wider surface water management system, a retained lagoon, the designated SINC at the south east corner of the site and land underneath pylons which cross the site. The amount of new floorspace will be determined as the development process progresses. As a very broad indication of the potential level of new floorspace, it is estimated that the site could accommodate in the region of c. 500,000 sq m of Class B floorspace. This is based on a number of assumptions and will be refined at a later stage. As set out above, some of the land within Tata Steel's control to the south of Queensway is already in employment use. The site also represents a significant opportunity to bring forward new employment development within the plan period. Despite this, no reference is made to the land within the ELR - either as an Existing Employment Area or as a future allocation. It is important that the land is considered as part of the assessment of land supply available across the plan period.

As part of its candidate site submission in August 2021, Tata Steel specifically requested that the site is allocated in the Replacement LDP for new Class B1, B2 and B8 uses, together with other complementary uses. Whilst a majority of the site is currently within the urban boundary, it is not subject to any other specific designation or allocation. Recognition in a specific policy would confirm the potential of the site to deliver significant new economic development over the plan period. A specific policy/allocation would also provide greater certainty to help realise the strategic economic growth and investment potential of the site, which would be in line with the aims of national planning policy.

Tata Steel continues to reiterate its request for the inclusion of a specific policy to support future employment development at the site (as set out below). Alternatively, the site should form part of a wider employment allocation policy.

"Policy XX: Land to the south of Queen's Way, Llanwern

The Council will encourage and support new Class B1, B2 and B8 uses at the 132 hectare site to the south of Queen's Way. The Council will also support other complementary uses at the site (including renewables/energy related development, quasi- education uses and vehicle storage/parking)."

In summary, Tata Steel is concerned that its landholdings (as submitted through the candidate site process in August 2021) are not given due consideration in the ELR (February 2022). Land to the south of Queensway should have been assessed and included in the employment land supply figures set out in the ELR and carried across to the 'Growth and Spatial Options' consultation paper. Failure to do so significantly underplays the available land supply within Newport. Further reference should also have been made to Tata Steel's land to the north of Queensway.

<p>Tata Steel would welcome the opportunity to engage with the Council as the plan emerges to ensure the strategic importance and opportunities relating to its land holdings at Llanwern are recognised, supported and appropriately reflected through policy designations in the plan.</p>	
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**GSO 052 - Welsh Government Soil Policy & Agricultural Land Use Planning - 00838**

Question / Response	Officer Response
<p>I refer to your e-mail of the 25th of January consulting the Department as a Specialist Consultee on Newport's Replacement Local Development Plan (RLDP) "Growth and Spatial Options Consultation". This response is made in accordance with Technical Advice Note (TAN) 6, Annex B1 and B6.</p> <p><u>1. Policy</u></p> <p>BMV agricultural land is identified as a 'national natural resource' under Policy 9 of Future Wales: The National Plan 2040.</p> <p>The Policy for BMV agricultural land is included in Planning Policy Wales (PPW) 11 (February 2021) under paragraphs 3.58 and 3.59 as detailed below: -</p> <p>The Best and Most Versatile (BMV) Agricultural Land.</p> <p>3.58 Agricultural land of grades 1, 2 and 3a of the Agricultural Land Classification system (ALC) is the best and most versatile and should be conserved as a finite resource for the future.</p> <p>3.59 When considering the search sequence and in development plan policies and development management decisions considerable weight should be given to protecting such land from development, because of its special importance. Land in grades 1, 2 and 3a should only be developed if there is an overriding need for the development, and either previously developed land or land in lower agricultural grades is unavailable, or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations. If land in grades 1, 2 or 3a does need to be developed, and there is a choice between sites of different grades, development should be directed to land of the lowest grade.</p> <p>To meet the requirements of PPW paragraph 3.58 and 3.59, the Department expects the Policy to be considered at the earliest point in the RLDP process and throughout. The department also expects that BMV policy is sufficiently evidenced and justified in the plan, sustainability appraisal, spatial strategy and site selection process - what weight has been given to BMV land and how BMV policy has been applied to the spatial strategy and site selection. It is recommended that a specific topic paper is produced to demonstrate how BMV policy has been applied and addressed in the RLDP.</p> <p><u>2. Growth and Spatial Options</u></p> <p>It is appreciated that only a high-level assessment of the options has been undertaken at this point against the RLDP Objectives, and that further assessment will be undertaken to establish the preferred option.</p>	<p>Noted</p>

<p>It is welcomed that potential impacts of all options on BMV agricultural land are considered under the 'Natural Resources' RLDP objective, however it is not clear in the documents how this assessment has been undertaken, what evidence base on agricultural land quality has been used and what weight is given to BMV agricultural land in the assessment process.</p> <p>The Department will expect clear evidence of how BMV policy is considered for each option and in the determination of the preferred option in terms of 'considerable weight' in protecting BMV land from development, demonstrating an overriding need if BMV land needs to be developed and application of the sequential test approach.</p> <p>The Previously Developed Land (PDL) priority approach for the spatial options is welcome in respect if BMV agricultural land, however it is not clear currently how much PDL is available, and would this meet the needs of the RLDP, or will greenfield sites still be required? This should be evidenced and justified for the preferred strategy for all allocation types.</p>	
<p><u>3. Employment Land Need.</u></p> <p>The Future Employment Land need to 2036 is recommended as 77.00ha. However, there is also a recommendation to retain current LDP employment allocation sites (157.8ha or 90.4ha if East of Queensway is removed) in the RLDP. The Department would expect, for sites over the recommend need and involving BMV, justification to be provided in the RLDP as to how PPW paragraph 3.58 and 3.59 is addressed and how this is considered within the spatial options.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><u>4. Integrated Sustainability Appraisal (ISA) Scoping Report and Evidence Base.</u></p> <p>Section 7.16 - 7.19 - The Department has concerns with the Land and Soil section of the ISA and the evidence base used for agricultural land quality information.</p> <p>Section 7.16 refers to 'Pre-1988 data...' on agricultural land quality. It is unclear if this is referring to the Predictive ALC Map (2019) or another source? The Department would welcome clarification on the data source used and that this is included in Annex B of the ISA.</p> <p>Section 7.17 refers to Figure B.13 in Annex B. This shows only validated ALC field survey data held by the Department and should be used together with Predictive ALC map information as per published guidance (see below).</p> <p>To assist LPA's in meeting BMV Policy requirements, the Department has produced the 'Predictive Agricultural Land Classification (ALC) Map for Wales (2019)'. This map is available to view on DataMap Wales and can be viewed and downloaded by LPA's via the link below.  <a href="https://www.gov.wales/agricultural-land-classification-predictive-map">https://www.gov.wales/agricultural-land-classification-predictive-map</a></p> <p>The map has been produced as a first step to assist LPA's make informed decisions regarding agricultural land quality and application of BMV Policy at an early stage in plan development, and as an evidence base for strategic planning and sustainability appraisal.</p> <p>The Department has also published guidance on the use of the Predictive ALC Map together with a flow chart when to commission a detailed ALC survey. The guidance is available at:</p>	<p>Noted.</p>

<p><a href="https://gov.wales/agricultural-land-classification-predictive-map-guidance">https://gov.wales/agricultural-land-classification-predictive-map-guidance</a>  Where the department holds detailed validated ALC field survey information for a site, this is also available via the link below: - <a href="https://datamap.gov.wales/layers/inspire-wg:Post_1988_ALC_Wales_Surveys">https://datamap.gov.wales/layers/inspire-wg:Post_1988_ALC_Wales_Surveys</a> .  Section 7.38 - The Department disagrees with the statement made under the seventh bullet point that 'Newport's land is mostly unsuitable for agricultural uses due to its lower quality agricultural grading....'  This is incorrect and should be amended. The ALC system assesses the capability of agricultural land for a wide range of cropping uses not the suitability for agricultural use of land.  Section 7.39 - the Department would consider the ISA objective in respect of BMV would be to give 'considerable weight to protecting such land from development' as opposed to just 'minimising loss...'</p>	
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**GSO 053 - Torfaen County Borough Council - 00032**

Question / Response	Officer Response
<p><b>GROWTH OPTIONS:</b>  <b>Growth Scenarios -</b>  1. Are there any scenarios that have been discounted which should be considered further, and why?  2. Which of the options do you feel is the most appropriate, and why?  <b>Assessment of Growth Options Against RLDP Objectives -</b>  3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</p>	
<p>1. No comment on whether any scenarios which have been discounted should be considered further.  2. No comment on which option is the most appropriate.  3. Consideration should be given to the need to relook at the scenarios subject to further 2021 Census date being released and the MYE issue. Understanding the regional picture will be an important part of the development of scenarios and the suitability and availability of lan</p>	Noted
<p><b>EMPLOYMENT LAND OPTIONS:</b>  <b>Recommendation One -</b>  4. Is this requirement appropriate for Newport?  5. Should it be different and if so, why?  <b>Recommendation Two -</b>  6. Should some sites be removed from the employment supply? Why?  7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.</p>	
<p>4. No comment on whether recommendation 1 or 2 should be chosen but the decision should be based on a review of existing allocations i.e., constraints and viability and location in relation to proposed residential sites.</p>	Noted

6. Once the above has been completed and the candidate site process completed, and the sites assessed then a decision should be made on whether Option 1 or Option 2 should be chosen.	
<b>SPATIAL OPTIONS:</b>	
8. Which of these options do you feel is the most appropriate, and why?	
9. Are there any other spatial distributions that should be considered, and if so, why?	
10. Are there any other matters that should be given consideration when assessing these?	
<p>8. Support the option of maximising the development of Previously Developed Land given the amount of land available to allow this and the focus on delivering residential development within the City Centre of Newport.</p> <p>9. The hybrid approach seems the most appropriate option that combines the benefits of the PDL approach (and availability) whilst supporting existing villages. It is difficult to comment further as the lack of information on the Candidate Site process and suitability of sites considering potential constraints e.g., Proposed Green Belt &amp; ecology and infrastructure etc, the regional (Cardiff Capital Region) development levels in neighbouring Local Authorities.</p> <p>10. The submitted Candidate Sites and the assessment of their suitability and whether any of the suitable submitted Candidate are located within the areas identified as the preferred spatial distribution is information that should support the assessment of growth levels and spatial distribution decisions. There is a requirement for allocations to be deliverable yet there is a lack of information on the submitted Candidate Sites to identify if the proposed spatial distribution is supported by the development industry in terms of housing and employment.</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.</p> <p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>
<b>Other Comments</b>	
We will continue to work with Newport City Council as the Plan progresses to ensure cross boundary issues are considered including housing growth levels. There is a need to work with Newport CC and our other neighbours to ensure an understanding of the regional context and collaborative/joint working on infrastructure requirements particularly adjoining Cwmbran to enable sustainable and resilient growth in both counties over the respective plan periods.	Noted As part of this process the LDP team will continue to work with partners, during the preparation of the replacement LDP to ensure any amendments to policy reflect the opportunities identified.

**GSO 054 - Gwent Wildlife Trust - 00041**

<b>Question / Response</b>	<b>Officer Response</b>
<p><u>Background:</u> Gwent Wildlife Trust (hereafter referred to as GWT) takes a keen interest in the RLDP, due to its possible impact on the biodiversity of the Gwent Levels, including the Gwent Levels SSSI, a UK-nationally important site, statutorily designated for its nature conservation interest. We consider that the SSSI and wider Gwent Levels are not appropriate for built development, due to likely adverse impacts on the</p>	Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.

<p>biodiversity of this complex and fragile wetland ecosystem, and we will object to any proposed allocations on or otherwise adversely affecting the SSSI.</p> <p>We consider that the levels of growth set out in the Growth Options are unjustifiably high, and that the local planning authority has provided no robust rationale for this. Elevated levels of built development would result in a substantially higher risk of adverse impacts on the Gwent Levels, and for this reason we object to them.</p>	
<p><b>Growth Options:</b></p>	
<p>GWR objects to paragraph 1 of page 12 of the document, which states that :-          "It is considered that some of these (ie the lower growth options) are unreasonable and can be discounted prior to assessment against the emerging plan objectives and the Integrated Sustainability Appraisal" (emphasis added)</p> <p>We further object to paragraph 3 page 12 of the document, which states :- "Only the higher scale of growth is to be considered further"</p> <p>We consider this to be a key admission, viz that the local planning authority is only considering aggressively elevated levels of growth, and provide no robust or transparent justification for this vitally important policy decision, which has taken place in the absence of any public participation in the LDP formulation process thus far.</p> <p>This approach is deficient, because it closes down democratic debate as to the advisability or otherwise of aggressively elevated levels of growth. Citing Policy 33 of Future Wales as the only rationale behind this is unjustified, because other policies of Future Wales, such as Policy 9 relating to resilient ecosystems and green infrastructure, indicate otherwise, and the development plan (Future Wales) should be read "in the round" (see below)</p> <p>It is instructive to note that all of the five growth options discarded before the consultation was launched are lower than the lowest levels taken forward to the next stage (paragraph 3 page 12).</p> <p>It is also important to point out that the growth options taken forward are almost all themselves higher than the level set out in the adopted LDP (paragraph 2 page 12 ), which was itself acknowledged by the local planning authority to constitute a high level of growth, above a trend- based option (Table 1 ).</p> <p>GWT would like to point out that the emerging Cardiff local development plan will also allocate land at a higher level than a trend- based option, therefore Newport, in pursuing an aggressively high growth option, would be competing with a much larger city adopting the same approach. This form of wasteful competition could result in damage to the Gwent Levels' biodiversity interest.</p> <p>Thus, in conclusion to this section, GWT considers that lower growth options have been discounted without recourse to a proper democratic debate. This is not in conformity with the local planning authority's own CIS, nor with the provisions of the LDP Manual Wales. Additionally, the decision to discount lower (and we would argue more sustainable) growth scenarios in advance of the formulation of the ISA is not in conformity with the SEA Directive and Regulations, and the Welsh Government's good</p>	<p>Noted. These scenarios do not reflect Newport's focus for growth role established by the Future Wales National Plan 2040 and the RLDP must conform with this plan.</p> <p>The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>



<p>practice guide to SEA, because inter alia the strategy of the adopted LDP was subject to ISA / SEA, and would have passed the tests of soundness following the LDP Examination. Whilst policy can change, it is unlikely that a growth strategy can go from being the local planning authority's preferred strategy, and passing the tests of soundness at Examination, to being so unacceptable that it is discarded without even being consulted upon as part of the RLDP in such a short period of time.</p> <p><b>Employment Land:</b></p> <p>GWT supports the recommendation not to allocate any further employment land over and above that allocated in the adopted LDP. However, the document does not contain enough detail for us to ascertain whether expansion of the Eastman/Solutia site would have advert impacts on the Gwent Levels, and we seek further, more detailed information in respect of this matter.</p> <p>Furthermore, the employment sites allocated but not developed in the adopted local development plan include land acknowledged by the local planning authority itself in Table 9 of its Employment Land Review Final Report 2022 as being on or abutting the Gwent Levels SSSI, viz Gwent Europark (16 ha). The local planning author is reminded that allocated sites in old local development plans cannot be simply "rolled forward" into new local development plans, and that all possible sites must be subject to the same rigours of a thoroughgoing and robust assessment (including inter alia ISA) in the light of modern planning thought. This being the case, it would seem very unlikely that the Gwent Europark site would survive those assessment processes, especially in view of the fact that the Gwent Levels SSSI is identified in the document itself as a "significant constraint" (see below).</p> <p>We therefore wish to preserve our position in respect of this site, and will be likely to object at later stages in the LDP formulation process if it is proposed for allocation.</p>	
<p><b>Spatial Options:</b></p> <p>At this stage in the local development plan formulation process, GWT provisionally supports the "Previously Developed Land-led" spatial option, because it would significantly reduce the likelihood of damage to Newport's biodiversity resources. However, this comes with the important caveat that much brownfield land is of substantive biodiversity value, and may be worthy of brownfield SINC/LWS designation.</p> <p>We are firmly of the view that any previously developed land site which may be proposed for allocation should be surveyed to EIA level from the point of view of biodiversity, to ascertain whether it is of substantial biodiversity value, and further that the provisions of Planning Policy Wales 11 and Technical Advice Note 5 in respect of brownfield land is complied with.</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.</p>
<p><u>The Local Planning Authority's Level of Protection Ascribed to the Gwent Levels in the Document:</u> GWT supports the local planning authority's identification of the Gwent Levels as a :-  "Significant constraint" which will :-  "limit where potential expansion could occur"</p>	<p>Noted</p>

However, we feel that this could be strengthened to the identification of the Gwent Levels as an "absolute constraint" on development, for the following reasons :-

1. SSSIs constitute only 12% of the land surface of Wales, and much of that is not, in any event, developable.
2. Newport City Council has declared a biodiversity and climate emergency, and Planning Policy Wales 11 establishes a strong protective context to SSSIs in relation to the Welsh town and country planning system, which is likely to be further strengthened by the forthcoming proposed amendments to Planning Policy Wales 11. The Minister has recently issued a series of Ministerial Statements on biodiversity and SSSIs, including in the light of COP 15 and the Welsh Government's Biodiversity Deep Dive.

All of the above leads us to be firmly of the view that the local planning authority should identify the SSSI as an absolute constraint, and that there should be a halt on major development on the Gwent Levels SSI.

Future Wales: The National Development Framework:

We consider that the local planning authority's treatment of the National Development Framework in the document is deficient, because whilst referring to Policy 33 (National Growth Areas), the document fails to make any reference whatsoever to Policy 9 (Resilient Ecological Networks and Green Infrastructure). Policy 9 is particularly relevant to the RLDP because it specifically namechecks the Gwent Levels as one of only six National Natural Resource Management Areas (NNRMAs) in Wales, and the exemplar for the other five.

The broad aim of the Gwent Levels NNRMA is to demonstrate what can be achieved at a landscape scale in terms of the sustainable management of natural resources (SMNR), and as Wales' statutory development plan, the local planning authority (and therefore the Replacement LDP) is required to have regard to it.

Policy 9 of Future Wales describes the Gwent Levels as :-

"... an ancient landscape with a special cultural significance. This area is also important for biodiversity, carbon storage and food production"

We concur with this.

The Welsh Government is developing its approach to the NNRMA through co-production pursuant to the Wellbeing of Future Generations (Wales) Act via the Gwent Levels Working Group, of which the local planning authority is a member.

The Document's Treatment of the Green Belt:

GWT supports the weight ascribed to the proposed Green Belt, to be delivered by a future Strategic Development Plan (SDP). We further support the local planning authority's policy in resisting development which would compromise the Green Belt.

Question / Response	Officer Response
<p><b>GROWTH &amp; SPATIAL OPTIONS</b></p> <p>We set out herein our clients' response to the Newport Local Development Plan (rLDP) Growth and Spatial Options consultation paper. Our clients are promoting their site for development through the rLDP, it was submitted as part of the first informal call for interest. Our clients are pleased to be able to have the opportunity to feed into the early stages of the Plan preparation process and hope that their input is helpful in forming the key components of the Plan.</p> <p>Our clients' land at Risca Road, Rogerstone, (along with land owned by Woodland Amenity Limited) is capable of accommodating around 110 dwellings towards the Local Development Plan. It is noted that the site was submitted at the initial call for sites (our submission is at appendix 1 for ease), but it was not possible to provide additional information for the subsequent call for sites (due to COVID not allowing elderly shareholders to meet and the ill health and subsequent demise of the chairman of Woodland Amenities Limited) and as a result a smaller area was submitted by Mr Herbert. However, we can confirm that the whole of that site is now available for consideration in the rDLP, comprising land belonging to R Herbert, D &amp; M Vaughan and Gwyllt Limited along with Woodland Amenities Limited (who our clients are working with). Accordingly, we provide at appendix 2 the latest proposals that our clients are currently working on for information.</p> <p>Our clients are in discussions with prospective house builders and housing associations in respect of the site and would welcome discussions with the Council on how it can contribute towards the Plan. Indeed, our clients are keen to demonstrate that the site would be deliverable, viable and sustainable such that they can provide a timetable for delivery to feed into the Council's trajectory both in terms of private and affordable homes. Whilst initial work on master planning, viability, ecology, landscape, transport and capacity has been undertaken (much of it previously submitted to the Council), an early meeting with the Council would assist with planning further work that is required on the proposals. We believe that given the time lapsed since the previous call for sites, it would be beneficial to factor in a second call for sites at the same time as the Preferred Strategy consultation to allow for further sustainable sites to be considered.</p> <p>Our client's response to the Growth and Spatial Options consultation is set out below and is to be considered against their overarching role which is to assist the Authority in achieving the objectives of the LDP and the Future Wales aspiration for Newport to increase its Strategic Role in the region.</p>	<p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>
<p><b>GROWTH OPTIONS:</b></p> <p><b>Growth Scenarios -</b></p> <p><b>1. Are there any scenarios that have been discounted which should be considered further, and why?</b></p>	
<p>We are strongly of the view that it is appropriate to discount the low growth options. In this regard, Policy 33 of Future Wales states that the Welsh Government support an "increased strategic role"</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred</p>

<p>however this cannot be a continuation of its existing role or approach towards growth and the benefits that it can bring, rather it requires enhanced levels of growth and investment.</p> <p>Table 1 provides a useful point of reference for establishing how an increased strategic role may be facilitated. Clearly in order to comply with Future Wales the Plan requires a level of growth that is at the very least equal to or greater than the current LDP level of growth, as such it can not be justified removing the PG Short Term level of growth. Whilst they are very similar, this along with the Dwelling Led 5yr level are the only two approaches that would seek a higher level of growth than is presently the case and therefore comply with Future Wales, all of the others would imply a reduced strategic role. Notwithstanding this, we accept the Council's reasons for discounting at this stage in order to avoid duplication of consideration. We set out the reasons for a higher level of growth in more detail in our answer to question 2 below.</p>	<p>Strategy Consultation Paper and associated Background Papers.</p>
<p><b>2. Which of the options do you feel is the most appropriate, and why?</b></p>	
<p>It is clear that the only two options that are appropriate, in line with Future Wales and an increased Strategic Role for Newport are those that are higher than the existing LDP level and in this regard we strongly believe that the Dwelling Led 5yr level is the most appropriate. It is clear that Future Wales anticipates Newport growing "in and immediately adjoining" the settlement and an increased strategic role for the city. As such it is key that an aspirational level of growth is sought that seeks to drive the increase to reflect the strategic role that Newport plays and to drive the regional economy.</p> <p>We would note that Wales as a whole is facing its most significant challenges for some considerable time and it is without question the case that the Replacement LDP is being prepared under some of the most challenging societal and economic conditions since World War Two.</p> <p>There are numerous factors providing the context for the level of growth sought which we believe point towards the higher levels. We set these out summarily below but note their importance in a higher growth requirement.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><u>Post Covid 19 recovery, energy crisis and Brexit</u></p> <p>It is clear that Newport faces significant challenges in order to achieve an increased strategic role in the context of the post Covid economy, Brexit Recovery and the ongoing energy crisis. Indeed, over recent years we have experienced exceptional circumstances that have the potential to severely and drastically impact upon the economy and society as a whole. We are strongly of the view that the planning process must play its part in helping to facilitate the economic recovery that is needed. Plainly economic recovery must form an over-riding requirement of the plan and without question must underlie the approach to be taken. An appropriate response to achieve an increased strategic role would be to plan for higher levels of growth than over recent plan periods.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><u>Constraints in adjoining Authorities</u></p> <p>In addition to meeting its own needs the Council will need to consider the lack of housing supply in neighbouring Authorities. Indeed, Future Wales is also clear that "Growth at Newport will help manage</p>	<p>Noted. NCC is supportive of cross council working and joint working and effectively tackling cross boundary issues.</p>

<p>the development pressures in the region by providing a strategic growth focus for the eastern part of the area". Newport has not just been dealing with its own needs in recent years and accordingly needs to consider the offsets from new homes not being provided in its neighbouring authorities. Whilst housing land supply requirements were formally abandoned by the Welsh Government, it does not change the record of poor delivery elsewhere and it follows logically that where needs aren't met within an Authority, they will need to be accommodated somewhere. Whilst this is an unsatisfactory and unsustainable position there is unlikely to be any change in this in the short term. Indeed:</p> <ul style="list-style-type: none"> <li>-Torfaen &amp; Caerphilly - as of April 2021 there was a cumulative shortfall across the two Authorities of over 4,000 dwellings from the levels envisaged within their respective Local Development Plans. This represents the number of households that could not be provided for in those respective Authorities. This is a shortfall of national significance that has a profound effect on house prices across the region; and</li> <li>- Monmouthshire - representations made by the Welsh Government on the Monmouthshire rLDP mean that further new housing allocations would not be needed in Monmouthshire. Given the additional constraints in Monmouthshire, including Phosphates and anticipated marine nitrates, it is likely that demand will be displaced from Monmouthshire to adjoining Authorities.</li> </ul> <p>Plainly, policy and supply constraints in adjoining Authorities will have a significant impact upon Newport City Council in respect of the housing market and affordability issues. This is a challenge that the LDP needs to respond to with higher growth rates than previous years in order to achieve an increased strategic role.</p>	<p>The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><u>Meeting needs</u></p> <p>It will be of utmost importance to ensure Newport establishes a level of growth that meets needs and does not exacerbate the existing supply constraints in South Wales, taking into consideration the shortfalls in adjoining Authorities alongside Newport's own needs. We believe that the 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. In this regard it is noted that:</p> <ul style="list-style-type: none"> <li>- given the potential impacts of Covid 19 on the economy and society, there will be a need to adopt a highly ambitious strategy which provides far greater flexibility to respond to the crisis through added stimulation of the construction sector;</li> <li>-account should be taken in the baseline figures of the levels of sustainability and selfcontainment that can be achieved through embracing working from home trends for those sectors where it is feasible. These are often the high added value jobs that are no longer tied to cities such as Bristol or Cardiff but can retain expenditure in the local area and encourage vibrant local areas; and</li> <li>-any requirement should ensure an appropriate level of flexibility for delivery indeed, it may be that a 20% flexibility allowance or greater provides an appropriate starting point. We will comment on this further when detailed information becomes available.</li> </ul>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><u>Addressing affordability</u></p>	<p><u>Noted</u></p>

<p>The Council's result in nearly achieving its affordable housing target for 2015-2020 is to be welcomed. However, the Council recognise that this is only a small proportion of the actual level of need. The latest Local Housing Market Assessment (LHMA) indicates that "as of the 31st March 2017 there were 6,838 households with active applications on the housing waiting list. In order to clear this backlog during the 5 year life of this LHMA we would need to allocate 1,368 units of accommodation each year". The final stated annual shortfall is 559 per annum which equates to 2,795 over the five year period. This is plainly a significant issue within the Authority which has no doubt been exacerbated by price increases that have been caused due to shortages of housing supply outside of the County.</p> <p>Our client is of the view that the replacement LDP provides an opportunity to seek to address affordability in a meaningful and substantive way.</p>		
<p><b>3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</b></p>		
<p>We have considered the assessment of each of the options and have commented where we believe that the assessment could be reviewed. Importantly, with regards to the lower growth options that are considered (options 2 to 6) in the first instance, we do not believe that these will contribute towards the Future Wales aim for Newport to have an increased Strategic Role in South Wales. This should form part of the assessment.</p>		<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><u>Option 1: 12,570 new homes and 12,945 jobs</u></p> <p>With regards to the higher growth option we have suggested that a number of the "colours" should be improved based on the potential for positive outcomes. Indeed, greater levels of investment in line with an Increased Strategic Role for Newport would have the potential to bring many significant benefits across the assessment areas. We are strongly of the view that this is the only option that would allow Newport to strive towards an increased Strategic Role in line with Future Wales.</p> <p>Our analysis is below</p>		<p>This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.</p>
Economy & Employment	We support the overall conclusions of this assessment	
Population & Communities	We support the overall conclusions of this assessment	
Health & Well Being	We support the overall conclusions of this assessment	
Equality, Diversity and Inclusion	We support the overall conclusions of this assessment	
Transport & Movement	Newport has been identified as a location for growth within Future Wales specifically because it is a sustainable location for growth. Its communities are well connected to public transport and well served by facilities. Indeed, our clients' sites at Risca Road are clear examples of this, being within two minutes walking distance of a train station. We note that it is indicated that more opportunities for investment could be apparent under high scenarios, we	

	believe that the Council’s assessment should be more positive on this – indeed, higher levels of growth would enable a step change in investment and enhancement that could be a significant benefit. This should be re-assessed as green. Indeed, this is far more likely to be the case than for small scale, incremental and piecemeal infill development and ad-hoc brownfield sites.	
Natural Resources	We are surprised by the comments set out herein, it is noted that water consumption would increase for all options however, there are sustainable means of managing this. Much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts. New greenfield sites can provide a means of softening urban edges through more appropriate landscape buffers, open space and interface with rural areas We also support the notion that greater investment brings the potential for more sustainable lifestyles, as greater facilities would exist and as construction techniques evolve and progress We are strongly of the view that with appropriate planning interventions, this could be at least an orange category if not green.	
Biodiversity and Geodiversity	Again the categorisation red seems inappropriate (Option 5 and 6 are green) yet brownfield sites have equal (if not greater) chance of disturbing habitats and actually being unable to adequately mitigate. There is significant opportunity to provide ecological enhancement and net gain from greenfield sites, this includes to Sites of Importance for Nature Conservations (SINCs).	
Historic Environment	We would note that each case would need to be dealt with based on its own merits, albeit there are more heritage assets (including Listed Buildings and Conservation Areas) within the urban area than there are in surrounding green fields.	
Landscape	As noted earlier much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts. New greenfield sites can provide a means of softening urban edges through more appropriate landscape buffers, open space and interface with rural areas	
Climate change	With regards to Flooding, there are considerable issues for existing properties in Newport, growth means higher investment and the potential to contribute towards solving existing problems. Increased investment in local facilities would mean potentially increasing sustainability.	

	A higher growth strategy will actively prevent growth being dispersed. Indeed, low growth means that people would “jump” the green belt – leading to greater in commuting or travel to Bristol and Cardiff	
With regards to the remaining options, we note:		
<p><u>Option 2: 9,450 new homes and 10,695 Jobs &amp; Option 3: 9,570 new homes and 8,640 jobs</u></p> <p>Given the similar scale of growth we consider both options in the following table in order to minimise duplication. It is noted in the first instance that these would be contrary to the Future Wales aspiration for Newport to achieve an increased strategic role.</p>		This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.
Economy & Employment	We support the overall conclusions of this assessment	
Population & Communities	We support the overall conclusions of this assessment	
Health & Well Being	We support the overall conclusions of this assessment	
Equality, Diversity and Inclusion	We support the overall conclusions of this assessment	
Transport & Movement	We support the overall conclusions of this assessment for both options	
Natural Resources	<p>As with option 1, we are surprised by the comments set out herein, it is noted that water consumption would increase for all options however, there are sustainable means of managing this.</p> <p>In addition, much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts. New greenfield sites can provide a means of softening urban edges through more appropriate landscape buffers, open space and interface with rural areas.</p> <p>We also support the notion that greater investment brings the potential for more sustainable lifestyles, as greater facilities would exist and as construction techniques evolve and progress.</p> <p>We are strongly of the view that with appropriate planning interventions, this could be at least an orange category if not green.</p>	
Biodiversity and Geodiversity	<p>Again the categorisation seems inappropriate (Option 5 and 6 are green) yet brownfield sites have equal (if not greater) chance of disturbing habitats and actually being unable to adequately mitigate.</p> <p>There is significant opportunity to provide ecological enhancement and net gain from greenfield sites, this includes to SINC and Special Areas of Conservation (SACs).</p>	
Historic Environment	It is unclear why options 2 and 3 are scored differently.	



	We would note that each case would need to be dealt with based on its own merits, albeit there are more heritage assets (including Listed Buildings and Conservation Areas) within the urban area than there are in surrounding greenfield.	
Landscape	We support the overall conclusions of this assessment	
Climate change	With regards to flooding, there are considerable issues for existing properties in Newport, growth means higher investment and the potential to contribute towards solving existing problems Increased investment in local facilities would mean potentially increasing sustainability. A higher growth strategy will actively prevent growth being dispersed. Indeed, low growth means that people would "jump" the green belt - leading to greater in commuting or travel to Bristol and Cardiff.	
<p><u>Option 4: 7,950 new homes and 9,405 Jobs, Option 5: 8,100 new homes and 6,720 jobs &amp; Option 6: 7,605 new homes and 5,835 jobs</u></p> <p>Given that Options 4, 5 and 6 are low growth options with broadly similar levels of new homes, we set out our combined comments on these options below in order to avoid duplication. It is noted in the first instance that these would be contrary to the Future Wales aspiration for Newport to achieve an increased strategic role</p>		This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.
Economy & Employment	We are of the view that these low growth options should all be categorised as red as they would not provide the combination of jobs and homes required to provide an increased strategic role for Newport	
Population & Communities	We are of the view that these low growth options should all be categorised as red as they would not provide the combination of jobs and homes required to provide an increased strategic role for Newport	
Health & Well Being	At the lower scales of growth these options are unlikely to provide the investment required in such facilities rather it would be a continuation of existing levels.	
Equality, Diversity and Inclusion	We support the overall conclusions of this assessment however, question whether this should be red given the importance of meeting needs.	
Transport & Movement	With each option there would be fewer opportunities for significant levels of investment in improved infrastructure or sustainable means of travel.	
Natural Resources	It is clear that lower growth levels would require less greenfield land which would clearly result in a continuation of the existing urban / rural interface. However, there are areas that could benefit from new landscaping / planting to soften the interface and provide visual benefits in this regard.	

Biodiversity and Geodiversity	The categorisation seems in appropriate and it is unclear why options 5 and 6 are green yet brownfield sites have equal (if not greater) chance of disturbing habitats and actually being unable to adequately mitigate due to more limited land availability on site. They do not have the same level of opportunity to provide ecological enhancement and net gain as greenfield sites.	
Historic Environment	We would note that each case would need to be dealt with based on its own merits, albeit there are more heritage assets (including Listed Buildings and Conservation Areas) within the urban area than there are in surrounding greenfield.	
Landscape	It is clear that lower growth levels would require less greenfield land which would clearly result in a continuation of the existing urban / rural interface. However, there are areas that could benefit from new landscaping / planting to soften the interface and provide visual benefits in this regard.	
Climate change	With regards to Flooding, there are considerable issues for existing properties in Newport, growth means higher investment and the potential to contribute towards solving existing problems. There would potentially be less investment in sustainability. Lower growth is likely to contribute towards increased commuting whereby people would be priced out of the local market and “jump” the greenbelt to alternative locations where homes are available.	

**EMPLOYMENT LAND OPTIONS:**

**Recommendation One -**

**4. Is this requirement appropriate for Newport?**

We are supportive of the recommendations of the Employment Land Review which seek to protect 157.8 ha of supply in order to achieve the 77ha requirement. We believe that this approach provides flexibility to achieve the Future Wales approach towards increasing the Strategic Role of Newport.

Noted

**5. Should it be different and if so, why?**

As noted above, we support the recommendations of the Employment Land Review. Recommendation Two -

Noted

**6. Should some sites be removed from the employment supply? Why?**

The Employment Land Review recommends that all the sites listed in Table E1 of the Executive Summary are retained within the RLDP, this includes both the Solutia Site and Queensway Meadows, therefore it is unclear why their removal is being considered, further clarity over this would be required in order for us to consider further but based on the evidence available to date we oppose the removal of employment land.

Noted. The Employment Land Review (NB not executive summary) discusses this in more detail, including the recommendations regarding East of Queensway Meadows at section 8.8.

It is noted that if Newport is to achieve its increased Strategic Role, it is imperative that it is providing a balance of jobs and homes and a significant supply of deliverable land for both purposes is available.		
<b>7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.</b>		
Given our response to question 6, we have no further comments on this question.		Noted
<b>SPATIAL OPTIONS:</b>		
<b>8. Which of these options do you feel is the most appropriate, and why?</b>		
We consider that the urban expansion option provides the most appropriate solution, this is framed on our approach towards growth which is based on the higher growth option (1) being the only approach that would be in compliance with Future Wales (i.e. an increased strategic role for Newport). For this reason we believe that the previously developed land (PDL) approach and Village Focus approaches should both be ruled out at this stage.		Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.
<u>Urban Expansion &amp; Hybrid Options</u> We note that there are various overlaps between the Urban Expansion and Hybrid Options, and we consider them jointly in the below table given the similarities. Indeed, we believe that given the lack of large suitable previously developed sites that may be available as new allocations, the PDL element is likely to be comprised of those existing allocations that are proven to be deliverable and capable of being rolled over alongside a small scale windfall assumption. As such with both options the amount of greenfield expansion land is likely to be similar given the scale of growth required in order to meet the strategic role of the City. However, we note that in respect of villages, it is likely to only be appropriate to consider small scale development parcels to meet local needs, rather than any significant scale of expansion. Our comments in respect of the assessment of both is set out below		This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.
Economy & Employment	Future Wales is clear that growth should be in and around Newport. As such, this approach would clearly be in line with the policy hierarchy. It is noted that over recent years there has been a concentration of development in the east of the City, there would be an opportunity with urban expansion to re-focus on the west, north west and north of the City. We are strongly of the view that this should be green for both the Urban Expansion option and the Hybrid Option. Population & Communities	
Population & Communities	We support the overall conclusions of this assessment with respect to the Hybrid Option but believe that the same conclusions could be drawn from the Hybrid Option due to the fact that a similar quantum of greenfield development will be required in both scenario	
Health & Well Being	We support the overall conclusions of this assessment with respect to the Hybrid Option but believe that the same conclusions could be drawn from the	

	Hybrid Option due to the fact that a similar quantum of greenfield development will be required in both scenario.	
Equality, Diversity and Inclusion	We believe that for both Urban Expansion and Hybrid Options, the assessment should be green. Indeed, both will facilitate significant opportunities for improvements and this should not be down played.	
Transport & Movement	Newport has been identified as a location for growth within Future Wales specifically because it is a sustainable location for growth. Its communities are well connected to public transport and well served by facilities.Indeed, our clients' sites at Risca Road) are a clear example of this, being within 2 minutes walking distance of a train station. We note that it is indicated that more opportunities for investment could be apparent under high scenarios, we believe that the Council's assessment should be more positive on this – indeed, higher levels of growth would enable a step change in investment and enhancement that could be a significant benefit. This should be re-assessed as green. Indeed, this is far more likely to be the case than for small scale, incremental and piecemeal infill development and ad-hoc brownfield sites.	
Natural Resources	We are surprised by the comments set out herein, it is noted that water consumption would increase for all options however, there are sustainable means of managing this. Much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts. New greenfield sites can provide a means of softening urban edges through more appropriate landscape buffers, open space and interface with rural areas. This has been actively demonstrated on our clients' sites which act as a gateway site to Newport from Caerphilly. We also support the notion that greater investment brings the potential for more sustainable lifestyles, as greater facilities would exist and as construction techniques evolve and progress. We are strongly of the view that with appropriate planning interventions, this could be at least an orange category if not green.	
Biodiversity and Geodiversity	Again the categorisation seems inappropriate yet brownfield sites have equal (if not greater) chance of disturbing habitats and actually being unable to adequately mitigate. There is significant opportunity to provide ecological enhancement and net gain from greenfield sites, this includes to SINCS. This is demonstrated by work undertaken on our client's site, where there are significant opportunities for betterment.	

Historic Environment	We would note that each case would need to be dealt with based on its own merits, albeit there are more heritage assets (including Listed Buildings and Conservation Areas) within the urban area than there are in surrounding green fields. Sites within our client's control would have no impacts on heritage assets.	
Landscape	As noted earlier much of the landscape surrounding Newport (where it is not at risk of flooding) is heavily influenced by negative urban impacts. New greenfield sites can provide a means of softening urban edges through more appropriate landscape buffers, open space and interface with rural areas.	
Climate change	With regards to Flooding, there are considerable issues for existing properties in Newport, growth means higher investment and the potential to contribute towards solving existing problems. As such, sites such as our clients where flooding is not a constraint but are in sustainable locations form a solution to this and cannot be considered negative. Increased investment in local facilities would mean potentially increasing sustainability. Appropriate levels of growth being identified would prevent growth being dispersed across numerous local authorities which has happened over recent years due to supply constraints. Low growth means that people would “jump” the green belt – leading to greater in commuting or travel to Bristol and Cardiff	
<b>10. Are there any other matters that should be given consideration when assessing these?</b>		
In supporting our assessment of both the highest growth option and spatial approach which requires greenfield land, we set out below a number of key considerations in the benefits that they can bring. In particular in helping Newport to achieve an increased strategic role but also in terms of the other key assessment areas.		Noted
<p><u>Sustainable growth locations</u></p> <p>It is inevitably the case that the supply of brownfield sites in Newport for redevelopment for residential purposes is limited. As such, the Council will need to consider sustainable and appropriate greenfield locations based around existing communities in line with Future Wales (ie growth in and around Newport). In reality, this is likely to focus on the western and north western parts of the City extents associated with existing built form and communities. Indeed, we are of the view that the LDP must not neglect the requirements of these existing communities in favour of more remote areas on the Eastern side of the City that would be more aligned to commuting patterns along the M4.</p> <p>It is anticipated that such focal points for proportionate growth include a number of existing communities with local facilities that can provide an opportunity to maximise levels of self-containment and sustainability. Indeed, proportionate growth can help to reinforce existing levels of sustainability but also seek to provide additional facilities and uses that can move to a greater level of neighbourhood and</p>		Noted. The Deposit Plan will include reviewed urban and village boundaries.

<p>community well-being. In this regard, our clients consider that Rogerstone is a suitable location to accommodate further sustainable growth.</p>	
<p><u>Rogerstone</u>  Our clients' site at Risca Road, Rogerstone is approximately 7.16ha in size and broadly rectangular in shape, it can accommodate around 110 dwellings and provide a large area of landscape planting and biodiversity gain on site. It is located immediately adjoining the north western extent of the settlement boundary for Rogerstone. It comprises a former allotment garden and adjacent grazing land that has degraded in its quality. To the south the site adjoins Risca Road. To the east is housing fronting Pontymason Lane, beyond which is further residential development.</p> <p>The site occupies a highly sustainable location and residents would be well placed to benefit from easy access to existing local services as well as wider facilities through walking, cycling and public transport. The Monmouthshire and Brecon Canal to the north of the site links into wider recreational and functional walking and cycling routes.</p> <p>Importantly the whole of the site lies within 700m walking distance of Rogerstone Railway Station which is one of the few South Wales Metro rail connections within Newport - a focal point around which new development should be encouraged. It means that future residents of the site would be within five minutes walking distance of a transport service that links to Cardiff, Ebbw Vale, and beyond (to Swansea, Bristol, London and the Midlands). Furthermore, regular bus services run along Risca Road providing links between Newport and Risca/Pontymister as well as between Newport and Blackwood.</p> <p>The site is within easy walking and cycling distance of a good range of facilities. These include supermarkets at Afon Village and Pontymister/Risca, a post office, various shops, restaurants, places of worship, recreation (the Rogerstone Welfare and Afon Village community centre / Muga, Rivermead as well as Newport Golf Club and Pontymister cricket and bowling clubs and the Fugitives cricket club ) and employment areas such as the Wern, Tregwilym and Pontymister industrial / trading estates as well as Cleppa Business Park.</p> <p>Rogerstone Primary School (2200m), Jubilee Park (2000m) and Mount Pleasant Primary Schools (1500m), and Bassaleg Secondary School (2.8km) are also conveniently located to the site along with the Risca Community Comprehensive School (Pontymason Lane) (500m) which has a leisure centre alongside.</p> <p>The wide array of local facilities affords an opportunity for future residents to maximise the proportion of their everyday lives within their local neighbourhood without relying upon the need for private car trips. Indeed, everyday needs can be catered for in the local neighbourhood and more strategic trips (for instance to the centre of Newport or Cardiff) can be made via the South Wales Metro system, reaching such destinations within 10 to 20 minutes and reducing the need to travel by car.</p> <p>It is considered an appropriate location for the provision of proportionate growth that would complement existing facilities and provide more opportunities for local people to remain in the area.</p>	<p>The Deposit Plan will include reviewed urban and village boundaries.</p>

<p>Importantly it would contribute to addressing a number of the issues set out within each of the draft Objectives in particular by virtue of the fact that it would be providing homes in a sustainable location that it is well linked to existing facilities and both active and public transport networks. The site presents an opportunity:</p> <ol style="list-style-type: none"> <li>1. to provide plots for high quality self-build homes for local people helping to support the rich mix of uses and house types required. This will meet a significant need that is not currently well catered for. It will help provide homes for families for life;</li> <li>2. to support and enhance existing facilities and services through providing homes in an appropriate location;</li> <li>3. to provide an opportunity to focus development around the existing train station which acts as a hub where such intensification is entirely appropriate and sustainable, helping to create a move away from reliance upon the private car;</li> <li>4. to capitalise on its location in close proximity to the canal to the north and the recreational benefits associated;</li> <li>5. to increase access to other formal recreation utilising the wide range of existing facilities located nearby including the Multi Use Games Area (MUGA) at the Rivermead Centre, Risca Leisure Centre, Newport Golf Club and Rogerstone Welfare as well as the cricket clubs at High Cross, Whiteheads and Pontymister cricket and bowls facilities;</li> <li>6. to enhance the entrance into both Rogerstone and Newport from Caerphilly in the north. Indeed, the site can become an attractive gateway into the Authority;</li> <li>7. to adopt an approach to design that reflects the traditional local character, density and appearance; and</li> <li>8. to make appropriate use of a former allotment site and declining pasture to provide a betterment in terms of green infrastructure and biodiversity through enhancements on site and off site if required</li> </ol>	
<p><b>EVIDENCE BASE:</b></p>	
<p><b>11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</b></p>	
<p>It is noted that only limited evidence is currently available and it is clear that there will be a need to publish significantly more evidence in respect of matters such as supply of housing land.</p>	<p>Noted</p>
<p><b>12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</b></p>	
<p>We have commented previously on the Objectives of the RLDP and reserve the right to comment further once the updated Objectives are consulted upon.</p> <p>For ease of reference, it is noted that in general terms we are supportive of the overall approach towards the objectives, however, we believe that particular attention is needed with regards to economic and population / community objectives. As we have stated earlier, there are significant challenges ahead and</p>	<p>Noted. The Deposit Plan will include reviewed urban and village boundaries.</p>

<p>it must be the role of the planning process to help address these issues rather than constrain recovery and realignment.</p> <p>We are strongly of the view that well planned urban extensions can contribute towards a range of the key objectives not just in respect of population and communities, inclusive of:</p> <ul style="list-style-type: none"> <li>o including a variety of housing types, tenures and densities along with neighbourhood centres with mixed uses and a range of facilities;</li> <li>o providing a landscape structure that builds on existing assets, including green infrastructure within the development, linking urban areas to the countryside beyond and creating a distinctive edge to the urban area;</li> <li>o providing opportunities for people to work locally and for small businesses to set up, grow and thrive</li> <li>o addressing the challenges that exist in the aftermath of Brexit and Covid and ensure that Newport can embrace and facilitate new markets and technologies;</li> <li>o presenting an opportunity to design energy efficient communities;</li> <li>o allowing pedestrian, cycle and public transport networks to be fully integrated, often improving services available to the adjacent communities, increasing health and well-being by reducing the reliance on cars; and</li> <li>o supporting the surrounding communities by providing homes for local people</li> </ul>	
<p><b>Other comments</b></p>	
<p>It is noted that our clients are currently in the process of liaising with house builders and housing associations in respect of refining development proposals for the site. However, they would welcome engagement with the Council on whether they consider either site could play a role in the delivery of sustainable communities through the replacement LDP.</p>	<p>Noted</p>

**GSO 056 - Nicola Newton - 00839**

Question / Response	Officer Response
<p>I was disappointed to hear from local councillor Steve Cocks that the Caerleon railway station may be removed from the updated plan.</p> <p>Surely this should be included to encourage travel on public transport.</p> <p>I gather the concern is that it will bring more cars into Caerleon. I think that the facility should not include car parking on a significant scale so that people can bus,cycle,walk to the station.</p> <p>I hope to see that progress is not stopped and the station is included in the plan. How else will we ever be able to travel around without cars?</p>	<p>The role of the Local Development Plan is to facilitate new and improved stations, but it does not directly allocate these or determine the location of new stations.</p> <p>As part of this process the LDP team will continue to work with partners, including Welsh Government and Transport for Wales, during the preparation of the replacement LDP to ensure any amendments to policy T1 reflect the opportunities identified by the appropriate transport strategies and that our development strategy seeks to</p>



	support the delivery of strategic and local transport improvements.
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**GSO 057 - Elizabeth Miles - 00840**

Question / Response	Officer Response
<p>I'm writing to express my support for including a walk up style station in Caerleon as well as in Ponthir. My family would certainly use either and it would stop us using our cars. In fact we'd get rid of one car completely.</p>	<p>The role of the Local Development Plan is to facilitate new and improved stations, but it does not directly allocate these or determine the location of new stations.</p> <p>As part of this process the LDP team will continue to work with partners, including Welsh Government and Transport for Wales, during the preparation of the replacement LDP to ensure any amendments to policy T1 reflect the opportunities identified by the appropriate transport strategies and that our development strategy seeks to support the delivery of strategic and local transport improvements.</p>

**GSO 058 - Dr Sophie John - 00841**

Question / Response	Officer Response
<p>I am expressing my support for the re-opening of a train station in Caerleon;</p> <p>This would greatly reduce congestion on the roads in Caerleon, especially given all the new homes in the University site. It would also decrease the concerningly high levels of pollution in Caerleon only benefitting the health of residents and school children which are situated very close to the high pollution areas.</p> <p>train station would increase links to other towns and improve transport to different cities. As we know, the M4 around Newport is a continuous problem and as the M4 relief road was scrapped it would mean many people in Caerleon, who work in Newport, Cardiff and further afield, could easily get quicker, safer, greener and cleaner transport.</p> <p>It would also improve links for people wanting to come into Caerleon, given all the historic interest and visitors we receive annually. This would only improve income to support local businesses.</p>	<p>The role of the Local Development Plan is to facilitate new and improved stations, but it does not directly allocate these or determine the location of new stations.</p> <p>As part of this process the LDP team will continue to work with partners, including Welsh Government and Transport for Wales, during the preparation of the replacement LDP to ensure any amendments to policy T1 reflect the opportunities identified by the appropriate transport strategies and that our development strategy seeks to support the delivery of strategic and local transport improvements.</p>

<p>A train station by the cycle path would be very well situated. In a world where we are trying to work towards a net zero target by 2050, making positive environmental improvements such as this seems like a great step forward that could be taken by NCC.</p>	
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**GSO 059 - Barratt David Wilson Homes - 00850**

Question / Response	Officer Response
<p><b>GROWTH OPTIONS:</b>  <b>Growth Scenarios -</b>  <b>1. Are there any scenarios that have been discounted which should be considered further, and why?</b>  <b>2. Which of the options do you feel is the most appropriate, and why?</b>  <b>Assessment of Growth Options Against RLDP Objectives -</b>  <b>3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</b></p>	
<p><u>Background</u>  Chapter 3 of the Growth and Spatial Options Document presents and seeks feedback on a series of growth scenarios which would in turn inform the housing requirement and the number of jobs to be planned for (which in turn would derive the employment land requirement). Initially, 12 scenarios are presented in Table 1 with Table 2 further refining this down to six Growth Options as the employment-led scenarios and those scenarios that would result in low levels of growth have been removed. .  As part of the Call for Sites in August and September 2021, Barratt David Wilson Homes submitted the site known as “Land at Llanbedr, Langstone” (CS0052). The submission was comprehensive and included an extensive package of documentation aimed at demonstrating environmental and technical acceptability and performance.  Given Barratt David Wilson Homes interest within Newport, the Growth Strategy is only relevant in so much as it informs the housing requirement with matters relating to the number of jobs to be planned (and associated employment land requirement) not of relevance.</p> <p><u>Context</u>  National planning policy is clear as to how a housing requirement should be formulated with Paragraph 4.2.6 of Planning Policy Wales Edition 11 (February 2021) stating that:  “The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans. These should be considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate</p>	<p>Noted. Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site’s Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>

<p>consideration must also be given to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities.”</p> <p>From the above text it is clear that:</p> <ol style="list-style-type: none"> <li>1. Household projections should be used as the starting point for establishing the housing requirement; but that</li> <li>2. Other elements of the evidence base should also underpin the housing requirement; and that also</li> <li>3. The wider political, economic, social, and environmental context, combined with what the Local Planning authority (LPA) want the Replacement Local Development Plan (RLDP) to achieve, should be considered.</li> </ol>	
<p><u>Point 1 – Household Projections</u></p> <p>Barratt David Wilson Homes suggest that the correct projection to use is the WG-2018-HIGHPOP (Growth Option 2). The reason for this is that, unlike the WG-2018-Principal or the WG-2018-LOWPOP projections, it is re-based to the 2021 Census.</p> <p>This is the right starting point because it makes use of the most recent set of household projections (2018-based) whilst responding to the actual findings of the 2021 Census which provide an incredibly accurate snapshot in time that is more recent than the 2018-based projections. Put another way, it reflects the actual position on the ground, and the projections associated with it, at a fixed point in time rather than a wholly projected scenario.</p> <p>This is particularly important in the case of Newport City Council (NCC) where there is a significant under estimation of the position compared to the actual findings of the 2021 Census. This is articulated in the “LDP Demographics” Paper prepared by Edge Analytics on behalf of Newport City Council which at Paragraph 2.25 states that:</p> <p>“Newport has seen the largest population increase between the 2020 MYE and 2021 Census population compared to other Welsh authorities (2.0%) (Figure 20). Only two out of the 22 Welsh authorities have seen an increase between the two population figures (Powys and Newport), with the rest of the authorities showing population declines.”</p> <p>Taking the above together, it would be the right approach for LPAs, in general, to use the WG-2018-HIGHPOP going forward and this is particularly important for an LPA such as NCC where there is a significant diversion between the 2018-based projections and the 2021 Census.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><u>Point 2 – Evidence Base Elements</u></p> <p>Two of the options presented in Table 2 of the Growth and Spatial Options Document are the PG-Short Term and PG-Long Term scenarios (the PG-Long Term is also presented as a Growth Option in Table 2). These scenarios use the ONS 2020 Mid-Year Estimate and then calibrate either to assume migration rates over the last five years (in the case of the PG-Short Term) or 19 years (PG-Long Term).</p> <p>The below table has been put together using the ONS’ “Local Area Migration Indicators” dataset from September 2021 and shows the net balance of inflow and outflow over the last ten years to and from</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers. To be passed to Edge for further consideration.</p>

Newport from other parts of the UK. In this case, it is calculated by subtracting the number of people that leave NCC to move to another local authority from the number of people that move to NCC from another local authority:

Year - Net Internal Inflow 2010-2011 90

2011-2012 -197

2012-2013 -357

2013-2014 -485

2014-2015 -11

2015-2016 271

2016-2017 1098

2017-2018 1211

2018-2019 445

2019-2020 1118

The table shows a changing balance over the last 10 years, from a period where there was a net outflow of people from Newport to a situation since 2015-2016 where there has been a sustained and significant net inflow of people from Newport. Assuming a household size of 2.3 people, the net inflow would represent an additional 486 homes per annum for 2019/2020. The 2018/2019 figure is an anomaly as a result of COVID19 - something that is recognised in Paragraph 2.15 of the "LDP Demographics" Paper.

The "LDP Demographics" Paper prepared by Edge Analytics explains why it is the case that there has been a net inflow since 2015/2016 at Paragraph 2.14 which states that:

"Likely factors driving this increase include the rate at which new homes have been built, the removal of the Severn Bridge toll in 2018 and the introduction of ONS' Higher Education Leavers Methodology (HELM)."

The fact that this the greatest net inflow is from Bristol, North Somerset, and South Gloucestershire (Figures 14 and 15 of the LDP Demographics Paper) helps to confirm this conclusion

The position with regards to the Severn Bridge tolls is fixed - the tolls have been removed and there is no indication of them being re-introduced. There is therefore no structural reason as to why the net inflow of people would reverse in coming years.

Barratt David Wilson Homes do not suggest it would be the right approach for either of the PG scenarios to be chosen as a Growth Option as ultimately they look at previous trends rather than future projections to come over the RLDP plan period, but it is clear that the level of UK based migration is such that a significant uplift on the selected demographic scenario should be applied and that this should be based on a PG option that considers the level of net internal migration over the last four years since the tolls have been removed (excluding the year effected by the COVID19 pandemic) rather than a longer time window. This should be applied as a "multiplier" on top of Growth Option 2.

<p><u>Point 3 - Wider Political, Economic, Social, and Environmental Context</u></p> <p>The main document that sets out how Newport should be seen in the context of the wider South East Wales region is Future Wales: The National Plan 2040. The status of Future Wales and what it means for Newport is set out in Section 2.1 of the Growth and Spatial Options document.</p> <p>There's no need to repeat what is said in either document here but it is clear from Policy 33 (National Growth Areas – Cardiff, Newport, and The Valleys) that Newport should:</p> <ul style="list-style-type: none"> <li>• Have an increased strategic role for sustainable long term growth,</li> <li>• Be a growth pole for new housing in the eastern part of South East Wales; and</li> <li>• Work alongside neighbouring authorities (both in South East Wales and England) to achieve this</li> </ul> <p>The implications of this are that any Growth Option selected must be aspirational and this is recognised in Section 3.1 of the Growth and Spatial Options document which, on Page 12, explains that a number of the options suggested in Table 1 have been dismissed due to their low scale of growth not being in conformity with Future Wales.</p> <p>The status of Newport in Future Wales is such that there is further justification for the selection of Growth Option 2 as a starting point given that it is aspirational in nature whilst the encouragement to work with neighbouring local authorities suggests that net inflow into Newport from neighbouring authorities should be welcomed and planned for through the incorporation of a PG scenario.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><u>Assessment of Growth Options Against RLDP Objectives</u></p> <p>Appendix A of the Growth and Spatial Options Document provides an appraisal of the performance of the six Growth Options against the 10 RLDP Objectives, in essence allowing to create a matrix that allows for comparison between the various options. This is built upon further in Appendix A of the Document. Barratt David Wilson Homes' concern is that the assessment undertaken as part of Table 3 and in Appendix A assumes that a certain Growth Option will have an "Amber" or even "Red" impact when the selection of appropriate sites which are environmentally and technically acceptable (or incorporate appropriate mitigation, compensation, and enhancement to achieve this) can mean that they can be delivered without a negative impact (i.e. with a "Green" or, at worst, "Amber" impact).</p> <p>In this sense, it is essential to stress that the comprehensive submissions that Barratt David Wilson Homes as part of the Call for Sites demonstrated that CS0052 – Land at Llanbedr, Langstone could be delivered in a way which is technically and environmentally sound such that the performance against many of these objectives could instead be considered to be "Green" in this context.</p>	<p>Noted. This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.</p> <p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>
<p><u>Extent of Flexibility Allowance</u></p> <p>Paragraph 5.58 of Edition 3 the Development Plans Manual (March 2020) is clear that there is a requirement for a flexibility allowance to be added on top of the housing requirement to derive the number of homes than RLDP should plan for. This is in the interest of ensuring that sufficient housing is delivered when some allocated sites either are not delivered or deliver less home than anticipated.</p>	<p>Noted, the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers provide greater detail on this.</p>

<p>Paragraph 5.59 of Edition 3 the Development Plans Manual is clear that the extent of the flexibility allowance should be informed by local issues with 10% as a starting point (i.e. as the minimum). Barratt David Wilson Homes recognise that the extent of the flexibility allowance will be determined considerably later in the RLDP preparation stage, likely at Deposit stage and that it is inappropriate to comment too much on this at this time.</p> <p>That said, Indicator OB4 MT3 of the Annual Monitoring Report (October 2022) for the period from April 2021 to April 2022 recognised a cumulative shortfall in housing delivery against the LDP’s housing trajectory. Historic performance against this indicator is presented in the table below:</p> <p>Year % Delivery Against Cumulative Required Rates</p> <p>2015 -5% 2016 3% 2017 -2% 2018 -6% 2019 -9% 2020 -12% 2021 -14</p> <p>Importantly, this is against the housing requirement of 10,350 homes and not the 11,623 homes that the adopted LDP plans for. In essence, in 2021 where the rate is a -14% rate, this is 14% below the housing requirement but 26% below the number of homes that were planned for which incorporated the 12% buffer in the adopted LDP.</p> <p>Even at this stage it is clear from the above that the 12% buffer in the adopted LDP is entirely inadequate and a greater buffer should be incorporated for the RLDP</p>	
<p><u>Conclusion</u></p> <p>Taking the above together Barratt David Wilson Homes suggest that Growth Option 2 should be used as the starting point but should be enhanced to reflect the higher levels of net inflow into Newport in recent years and Newport’s significance to the South East Wales region in Future Wales. Whilst for consideration in subsequent consultations, a greater flexibility should be applied on top of the housing requirement than that in the adopted LDP.</p>	<p>Noted, the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers provide greater detail on this.</p>
<p><b>SPATIAL OPTIONS:</b></p> <p><b>8. Which of these options do you feel is the most appropriate, and why?</b></p> <p><b>9. Are there any other spatial distributions that should considered, and if so, why?</b></p> <p><b>10. Are there any other matters that should be given consideration when assessing these?</b></p>	
<p><u>Background and Policy Context</u></p> <p>Chapter 4 of the Growth and Spatial Options Document presents four Spatial Options as to how the requirements outlined in Chapters 2 and 3 should be distributed spatially. Four options are presented -</p>	<p>Noted</p>

one which would be to focus new housing on previously developed land, a second which would be to focus on a series of greenfield allocations on the edge of the urban boundary, a third of directing growth to nine identified villages, and a fourth which is a hybrid of the previous three options.

Paragraph 3.44 of Planning Policy Wales Edition 11 (February 2021) provides guidance as to how the site search sequence should be undertaken when identifying residential allocations, stating that:

"Where there is a need for sites, but it has been clearly demonstrated that there is no previously developed land or underutilised sites (within the authority or neighbouring authorities), consideration should then be given to suitable and sustainable greenfield sites within or on the edge of settlements. The identification of sites in the open countryside, including new settlements, must only be considered in exceptional circumstances and subject to the considerations above and paragraph 3.50 below."

#### Commentary on Reliance on Previously Developed Land Approach

Whilst there is no doubt that the delivery of previously developed land (PDL) is prioritised in national planning policy, the Growth and Spatial Options Document recognises that there is not going to be sufficient previously developed land available for the continuation of the PDL-led approach taken in the adopted LDP. The first paragraph of Section 5 of Document is clear on this, stating that:

"While the merits of continuing this strategy are understood, there is some concern that previously developed land is a finite resource and the availability of sites may not be as buoyant as it was or the reuse of land for housing may require the de- allocation of some employment sites."

On this basis, the selection of the PDL-led Spatial Option is not going to be sufficient to meet the higher Growth Options (and importantly the Growth and Spatial Options paper discounts the lower Growth Options).

There is also a wider point as to whether reliance on a PDL-led strategy is a sufficiently robust Spatial Strategy to ensure that the housing requirement is delivered in full. The adopted LDP relies on a PDL-led strategy and, as set out in connection to the flexibility allowance for the Growth Options questions, this has resulted in a significant shortfall of housing delivery compared to the housing trajectory. Analysis from the Annual Monitoring Report (October 2022) for the period from April 2021 to April 2022 shows that there are 1,189 (equating to 11.5% of the total housing requirement) units that the adopted LDP anticipated to be delivered on brownfield sites in the adopted LDP plan period but now are not expected to be delivered prior to its end date in 2026.

From the above, it is clear that there is not enough PDL land for the implementation of a PDL-led Spatial Strategy and that, even if there was, the implementation of a PDL-led approach would likely result in a shortfall in delivery against requirement.

Barratt David Wilson Homes therefore suggest that:

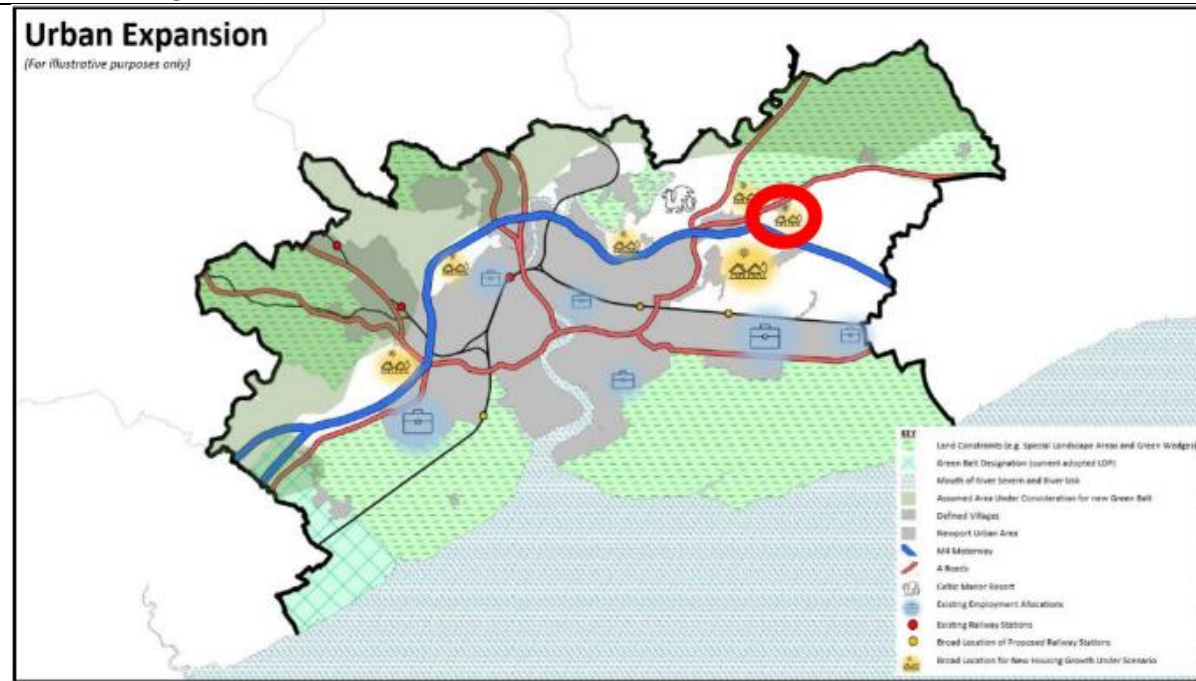
-Any PDL allocations in the adopted LDP where development has not commenced should continue to be supported through a positive allocation but should not be relied upon to meet the housing requirement;

-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; and  
 -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 available and viable.

**Suggested Approach**

The higher Growth Options (including the modified Option 2 that Barratt David Wilson Homes are suggesting) that are set out in the Growth and Spatial Options Document are unlikely to be able to be met in their entirety through either the “Village Focus” Spatial Option or the “Urban Expansion” option and therefore it is suggested that the “Hybrid” Spatial Option is really the only suitable Spatial Option that can deliver the higher Growth Options that are suggested and continue to perform strongly against the RLDP’s objectives. As part of this, it is essential that the “Hybrid” Spatial Option directs new housing to the most appropriate locations which, for the reasons set out below, should include Langstone. As part of the “Hybrid” Spatial Option which is supported by Barratt David Wilson Homes, there will be a requirement for a number of greenfield extensions to Newport and its surrounding settlements and it is positive to see that the illustrative diagram for the “Urban Expansion” Spatial Option specifically identifies Langstone (as circled in red below) as a “Broad Location for New Growth Under Scenario”.

Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background





<p>Whilst it is recognised that these diagrams are wholly illustrative and do not allow identification of specific sites, Barratt David Wilson Homes support the identification of Langstone as an appropriate location for new housing and, whilst this is specifically in connection to the “Urban Expansion” Spatial Option, it is logical that the same conclusion can be reached for the “Hybrid” Spatial Option given that it inherently will include urban extensions.</p> <p>Langstone is considered a highly suitable for location for new housing as part of a Hybrid Spatial Option for the following reasons:</p> <ul style="list-style-type: none"> <li>• It is largely free from fundamental constraints in that it is largely free from flood risk, is outside of the “Assumed Area Under Consideration for New Green Belt”, is not washed over by, and is generally distant from, significant landscape, ecological and heritage designations,</li> <li>• As demonstrated in the Transport Assessment (prepared by Lime Transport) submitted as part of the Call for Sites, Langstone is a sustainable location which is well-connected to local bus routes and contains a mix of local services; and</li> <li>• It would add to the range and choice of housing supply locally in a context where the adopted LDP did not make new housing allocations within Langstone (instead only creating a positive planning context for a series of existing housing commitments which have now been fully delivered).</li> </ul> <p>Whilst clearly this consultation is not focussed on assessing individual sites such that they can be allocated, Barratt David Wilson Homes would emphasise the fundamental suitability of CS0052 – Land at Llanbedr to accommodate new housing in Langstone.</p>	
<p><u>Conclusion</u></p> <p>Barratt David Wilson Homes recognise the “Hybrid” Spatial Option to be the only approach that can realistically be relied upon to deliver the housing requirement. That said, the approach needs to focus growth in those locations where it is appropriate and, for the reasons above, it is suggested that Langstone is one of those.</p>	<p>The Deposit Plan will include a review of the urban and village boundaries.</p>

**GSO 060 - Redrow Homes (South Wales) Limited Great Milton Park - 00640**

<b>Question / Response</b>	<b>Officer Response</b>
<p>We write on behalf of our client, Redrow Homes (South Wales) Ltd (‘the client’), to provide a response to Newport City Council’s (NCC) Growth and Spatial Options consultation in preparation of the Replacement Local Development Plan (RLDP) 2021-2036, in respect of their land interests at Land south west of Great Milton Park, Llanwern (see site location plan at Appendix A).</p> <p>The above site was promoted through the Council’s previous Call for Candidate Sites consultation for residential-led development in August 2021. Further details on the above site and our response to the Council’s Growth and Spatial Options Paper, subject of this consultation, are set out further in this letter.</p>	<p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site’s Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>

**Growth Options**

The Council has identified several growth options which are to be tested to determine the most suitable and sustainable strategy for housing and employment growth up to 2036. The testing of a range of growth scenarios was commissioned independently by the Council, incorporating the latest demographic evidence (including the initial 2021 Census results), to assist with their assessment of the appropriate level of growth for the city

The findings of The LDP Demographics report (September 2022), prepared as evidence base to support the emerging RLDP, shows that over the plan period Newport will experience population growth of between 4% and 14.9% (as estimated under the range of scenarios tested).

On a regional basis, the population of the Cardiff Capital Region (which includes Newport) is ageing, and it is likely that a quarter of the population will be aged over 65 years old by 2039. As such, the available workforce is shrinking, and the city of Cardiff is projected to be the only local authority in the region with a growing population aged 16-64 between now and 2039. Consequently, the Cardiff Capital Region City Deal is looking to create an additional 25,000 new jobs within the region.

A significant increase in the level of housing planned within the region is required in order to underpin the economic aspirations and opportunity provided by the City Deal.

The consultation paper acknowledges that when considering all eleven growth scenarios, some of these were deemed unreasonable and therefore discounted from assessment against the Integrated Sustainability Appraisal (ISA). The employment-led scenarios tended to result in a negative need for employment land over the plan period with outputs much lower than the adopted growth strategy. The consultation document also sets out that where scenarios have been assessed and result in a low scale of growth, these have been discounted from further assessment as they did not align with Newport's focus for growth.

Future Wales: The National Plan 2040, identifies Newport within a National Growth Area which will be the main focus for growth and investment in the south east region (Policy 33). The Welsh Government supports an increased strategic role for Newport as a focus for sustainable long-term growth and investment. The Council's strategy to discount any scenario that resulted in a low scale of growth is therefore strongly supported given that this complies with national policy and continues to support the role Newport has to play in delivering growth for the south east region.

The consultation paper also recognises that of the six growth scenarios taken forward for further assessment, these scenarios propose a wide range of potential housing and employment need. However, the Council acknowledges that new jobs need to be supported through housing growth as this is essential in enhancing Newport's economic role within the region and avoiding the need to commute outwards to work. We strongly support the Council's recognition that the delivery of housing is required to support jobs and prevent outwards commuting as for any economic growth strategy it is vital that housing growth underpins jobs growth as one cannot come forward without the other.

Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.

<p>We generally support growth options 1 (Dwelling-led 5YR), 2 (WG-2018-HIGHPOP) and 3 (Dwellingled 10YR). These three growth scenarios also perform best against the emerging RLDP objectives of 'Economy and Employment', 'Population and Communities' and 'Health and Wellbeing'. We consider that to deliver against the Welsh Government's requirement for promoting Newport's strategic role, an increase in growth should be attributed to the city. It is also considered that apportioning a greater amount of growth to Newport will help manage the development pressures in the region by providing a strategic growth focus for the eastern part of the south east region, in accordance with the requirements of Future Wales.</p> <p>In addition to directing development towards Newport as a National Growth Area, national policy also requires development to be sustainably located with easy access to public transport and other public services. In accordance with policy, the site which is subject to these representations is suitable for delivering a range and choice of housing (including affordable housing) in a sustainable location on a deliverable site. This can contribute towards the resilience of the RLDP's housing trajectory, the effectiveness of the emerging plan and aid towards defining Newport as a strategic growth area.</p>	
<p><b>Spatial Options</b></p>	
<p>The Council's Growth and Spatial Options Paper sets out several spatial options available for supporting the delivery of new growth in Newport up to 2036. One spatial option considered is prioritising the re-use of previously developed land (PDL). Although we do not necessarily oppose this option, it should be recognised that there is a lack of suitable, viable and deliverable brownfield sites within the city. Therefore, the release of greenfield land is required to meet the need for new housing. The greenfield site subject to this consultation response is free of any major constraints and is sustainably located such that that it is available and deliverable for residential development.</p> <p>Two alternative options, being 'urban expansion' and 'village focus', are also being considered as spatial options as part of preparing the RLDP. In terms of taking an urban expansion approach, the consultation document explains that this would require the identification of land on the edge of the urban boundary whereas a village focus would constitute directing development towards nine defined villages, including Llanwern. These spatial options are generally supported as targeting development under either approach would see sustainable sites come forward given proximity to existing established settlements and the associated ease of access to public transport and other public services.</p> <p>The site at Land south west of Great Milton Park, Llanwern proposes housing growth in a location well related to Great Milton Park which will provide a range of neighbourhood facilities (such as a school, village centre and Multi-use Games Arena) and therefore demonstrates the holistic approach sought by PPW, which seeks the right development in the right place to achieve sustainable placemaking outcomes. A range and choice of housing can be provided on site. Redrow are committed to creating a place which will be suitable and attractive for new residents, and which will embrace the increasing ability to work</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.</p> <p>The Deposit Plan will include a review of the urban and village boundaries. The Settlement Assessment Background Paper provides a village appraisal.</p>

<p>flexibly and from home. As well as providing for a wide mix of house types and sizes, Redrow’s home design and digital connectivity ensures that working from home is an attractive option.</p> <p>The site proposes housing in a landscape setting with significant multifunctional green space (comprising circa 55% of the overall development area). Opportunities for local food production through the provision of local grow spaces can be provided along with the provision of children’s play facilities and nature walks. The proposal therefore provides the opportunity for existing residents to utilise the open space provided as part of the development to the benefit of the existing community. The site would therefore help create and sustain the community and accord with PPW and Policy 2 of Future Wales.</p> <p>Our client’s site is located adjacent to the existing settlement boundary and has the potential to connect the new Great Milton site with the council’s own land allocated but not yet developed. A new link will be advantageous in relation to active travel routes and potentially public transport route.</p> <p>The land is also free from any overriding unresolvable physical constraints, including infrastructure and utilities, access, ground conditions, landscape, heritage designations, flood risk issues and pollution. It is not located within a Phosphorus Sensitive Catchment Area and can be delivered early in the plan period to contribute towards the resilience of the RLDP’s housing trajectory. It is considered that if the Council adopted an urban expansion or village focus approach, given the site is sustainably located and likely to accord with the parameters and objectives to be set within either approach, allocation of this site would therefore contribute to the soundness of the plan through assisting with its effectiveness.</p> <p>The Council also propose a ‘hybrid’ spatial option to accommodate future growth. This would include a mix of previously developed land, sites on the edge of urban boundary and sites at surrounding existing villages. This approach is generally more supported over the other spatial options as it provides greater flexibility for allocating the right sites in the right locations to deliver development that addresses local and regional need.</p> <p>Overall, we encourage the Council to ensure that sites allocated for residential use are assessed on a site by site basis. Our client’s site is sustainably located, deliverable and considered worthy of allocation in the emerging RLDP. The site is located adjacent to existing development and meets the principles of ‘facilitating developments which are sited in the right locations’, as advocated by Planning Policy Wales (PPW) (paragraph 4.1.10).</p>	
<p><b>Evidence Base</b></p> <p>The LDP Demographics Report states that when considering growth outcomes, it is important to note that they have been developed during a period of unprecedented social and economic upheaval caused by Brexit and the COVID-19 pandemic, the full impacts of which are not currently fully understood. Alongside these factors, the full detailed results of the 2021 Census are expected in late 2022 / early 2023 which will provide an important update to the demographic evidence base for all local authorities. Once this is available, the report recommends that NCC should consider a range of demographic scenarios and updated assumptions informed by more accurate projections. Therefore, depending on</p>	<p>This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail. Updated evidence will be considered as this emerges over the course of the RLDP process.</p>

when the next stage RLDP is published, it is expected that the Council will take into consideration any updates to population and growth predications, and as such, we reserve the right to comment further on any updated figures, once made available.	
<b>Summary</b>	
In summary, we broadly support the growth and spatial options proposed by the Council. We encourage the Council to adopt an approach that allocates the right sites in the right locations as advocated by PPW which can demonstrate that they are suitable, deliverable, and sustainable whilst also positively contributing towards the Council's housing delivery targets and placemaking principles.	Noted
We reserve the right to comment further at the Preferred Strategy stage specifically in relation to the site selection process although we consider our client's site at Llanwern to be sustainably located and deliverable such that it is worthy of allocation in the emerging LDP.	

**GSO 061 - Redrow Homes (South Wales) Limited Magor Junction 23A - 00640**

<b>Question / Response</b>	<b>Officer Response</b>
<p>We write on behalf of our client, Redrow Homes (South Wales) Ltd ('the client'), to provide a response to Newport City Council's (NCC) Growth and Spatial Options consultation in preparation of the Replacement Local Development Plan (RLDP) 2021-2036, in respect of their land interests at St Brides (Land north of Junction 23A) (see site location plan at Appendix A).</p> <p>The above site was promoted through the Council's previous Call for Candidate Sites consultation for residential-led development in August 2021. Further details on the above site and our response to the Council's Growth and Spatial Options Paper, subject of this consultation, are set out further in this letter.</p>	<p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>
<p><b>Growth Options</b></p> <p>The Council has identified several growth options which are to be tested to determine the most suitable and sustainable strategy for housing and employment growth up to 2036. The testing of a range of growth scenarios was commissioned independently by the Council, incorporating the latest demographic evidence (including the initial 2021 Census results), to assist with their assessment of the appropriate level of growth for the city.</p> <p>The findings of The LDP Demographics report (September 2022), prepared as evidence base to support the emerging RLDP, shows that over the plan period Newport will experience population growth of between 4% and 14.9% (as estimated under the range of scenarios tested).</p> <p>On a regional basis, the population of the Cardiff Capital Region (which includes Newport) is ageing, and it is likely that a quarter of the population will be aged over 65 years old by 2039. As such, the available workforce is shrinking, and the city of Cardiff is projected to be the only local authority in the region with</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>

a growing population aged 16-64 between now and 2039. Consequently, the Cardiff Capital Region City Deal is looking to create an additional 25,000 new jobs within the region.

A significant increase in the level of housing planned within the region is required in order to underpin the economic aspirations and opportunity provided by the City Deal.

The consultation paper acknowledges that when considering all eleven growth scenarios, some of these were deemed unreasonable and therefore discounted from assessment against the Integrated Sustainability Appraisal (ISA). The employment-led scenarios tended to result in a negative need for employment land over the plan period with outputs much lower than the adopted growth strategy. The consultation document also sets out that where scenarios have been assessed and result in a low scale of growth, these have been discounted from further assessment as they did not align with Newport's focus for growth.

Future Wales: The National Plan 2040, identifies Newport within a National Growth Area which will be the main focus for growth and investment in the south east region (Policy 33). The Welsh Government supports an increased strategic role for Newport as a focus for sustainable long-term growth and investment. The Council's strategy to discount any scenario that resulted in a low scale of growth is therefore strongly supported given that this complies with national policy and continues to support the role Newport has to play in delivering growth for the south east region.

The consultation paper also recognises that of the six growth scenarios taken forward for further assessment, these scenarios propose a wide range of potential housing and employment need. However, the Council acknowledges that new jobs need to be supported through housing growth as this is essential in enhancing Newport's economic role within the region and avoiding the need to commute outwards to work. We strongly support the Council's recognition that the delivery of housing is required to support jobs and prevent outwards commuting as for any economic growth strategy it is vital that housing growth underpins jobs growth as one cannot come forward without the other.

We generally support growth options 1 (Dwelling-led 5YR), 2 (WG-2018-HIGHPOP) and 3 (Dwellingled 10YR). These three growth scenarios also perform best against the emerging RLDP objectives of 'Economy and Employment', 'Population and Communities' and 'Health and Wellbeing'. We consider that to deliver against the Welsh Government's requirement for promoting Newport's strategic role, an increase in growth should be attributed to the city. It is also considered that apportioning a greater amount of growth to Newport will help manage the development pressures in the region by providing a strategic growth focus for the eastern part of the south east region, in accordance with the requirements of Future Wales.

In addition to directing development towards Newport as a National Growth Area, national policy also requires development to be sustainably located with easy access to public transport and other public services. In accordance with policy, the site which is subject to these representations is suitable for delivering a range and choice of housing (including affordable housing) in a sustainable location on a

<p>deliverable site. This can contribute towards the resilience of the RLDP’s housing trajectory, the effectiveness of the emerging plan and aid towards defining Newport as a strategic growth area.</p>	
<p><b>Spatial Options</b></p>	
<p>The Council’s Growth and Spatial Options Paper sets out several spatial options available for supporting the delivery of new growth in Newport up to 2036. One spatial option considered is prioritising the re-use of previously developed land (PDL). Although we do not necessarily oppose this option, it should be recognised that there is a lack of suitable, viable and deliverable brownfield sites within the city. Therefore, the release of greenfield land is required to meet the need for new housing. The greenfield site subject to this consultation response is free of any major constraints and is sustainably located such that it is available and deliverable for residential development.</p> <p>Two alternative options, being ‘urban expansion’ and ‘village focus’, are also being considered as spatial options as part of preparing the RLDP. In terms of taking an urban expansion approach, the consultation document explains that this would require the identification of land on the edge of the urban boundary whereas a village focus would constitute directing development towards nine defined villages. These spatial options are generally supported as targeting development under either approach would see sustainable sites come forward given proximity to existing established settlements and the associated ease of access to public transport and other public services.</p> <p>The Council also propose a ‘hybrid’ spatial option to accommodate future growth. This would include a mix of previously developed land, sites on the edge of urban boundary and sites at surrounding existing villages. This approach is generally more supported over the other spatial options as it provides greater flexibility for allocating the right sites in the right locations to deliver development that addresses local and regional need.</p> <p>We recommend that a hybrid approach should also include the allocation of strategic sites which have the ability to create new cohesive communities, deliver on-site green infrastructure, create high quality employment uses and deliver a range and choice of housing for all sectors of the population, including affordable homes for local people.</p> <p>The Cardiff Capital Region Strategic Business Plan, which has been prepared and endorsed by the ten local authorities within the region, identifies that:</p> <p>“The housing shortfall of the region, linked to the future economic aspirations of the Regional Cabinet, is being fully explored and detailed as an expression of ‘need’... [the Regional Cabinet will] promote access to a range of housing, including affordable... Having a range of housing choice can stimulate latent housing markets, with long term benefits to communities.”</p> <p>The Authorities, through the Cabinet’s City Deal, specifically endorse that:</p> <p>“In some parts of the region there is potential to explore the development of new settlements (settlements of the future) which would combine housing, employment, education and leisure elements in a planned, sustainable development of significant scale” (emphasis added)</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.</p> <p>The Deposit Plan will include a review of the urban and village boundaries.</p>

It is considered that a new settlement in this location – by way of providing consistency of housing supply over a prolonged period in addition to a mix and range of employment and supporting community uses - can play an essential role in addressing the above issues.”

Our client’s site at St Bride’s (Land north of Junction 23A) is proposed as a new settlement to accommodate residential-led development within the city. This site is considered to be sustainably located, presents no ‘in principle’ constraints to preclude development and would contribute to the soundness of the emerging plan. The RLDP needs to be underpinned by a choice and range of immediately available sites in order to ensure continuity of housing supply throughout the plan period. Therefore, adopting a hybrid approach which includes allocating smaller, readily available sites to deliver housing in the short-medium term and strategic sites to a range of homes are delivered in the medium-long term will ensure a strong and consistent housing trajectory.

The site provides the opportunity to facilitate the proposed railway station at Magor (as identified as part of the South Wales Metro proposals). The proposal is for a community “Walkway” station as the site is within ten to fifteen minutes walking distance of the entire population of Magor and Undy (population 6-7,000) and sits perfectly with the recent Active Travel (Wales) Act 2013. The intention is to integrate the railway station as a valuable part of the social fabric of the community so that it is not seen as a piece of infrastructure on the fringe of the community only used for a few hours a day.

The development of a new settlement will have the potential to generate additional support, accelerate and even help fund this process through increasing the critical mass and catchment of potential rail users for the new station.

In addition, there are improvement proposals at Severn Tunnel junction including further parking for customers and improved walking and cycling linkages for patrons. The eastern part of the proposed land ownership is between 1.5-2km from this station.

Additionally, plans for a new £50million railway station and 1,000 car park space park and ride facility are being progressed to the west of the site at Llanwern. The proposed station is located within a 30 minute cycling isochrone of the proposed new settlement at St Brides.

Whilst the abolishment of the Severn Bridge tolls occurred at the end of 2018, its wider effect on the of the economy Authority area, commuting patterns, housing demand, housing need and housing requirement should not be underestimated. In this regard, the Welsh Government commissioned a report on ‘The Impact of the Severn Tolls on the Welsh Economy’ (Arup, May 2012) which states: “It is likely that reducing the toll regime would increase the housing market pressure to the South of the county driven by commuters to Bristol and South Gloucestershire.” (Page 61)

The West of England Joint Spatial Plan Topic Paper 8 relating to transport identifies that:

“The removal of tolls on the Severn Crossings from the end of 2018 is forecast to result in a large increase in traffic using the crossings due to increased economic activity and greater commuting between the two sides of the estuary.”



<p>The mixed-use proposals at the site provide an opportunity to support and underpin increased economic activity.</p> <p>As previously referenced, there is moreover a pressing need for the economic aspirations of the wider city-region, not least through the Cardiff Capital Region City Deal, to align with the level of housing provision within the city.</p> <p>The allocation of the site would accordingly contribute to the soundness of the Plan through ensuring that it 'fits' and is consistent with other wider plans and initiatives.</p> <p>Overall, we encourage the Council to ensure that sites allocated for residential use are assessed on a site by site basis. Our client's site is sustainably located, deliverable and considered worthy of allocation in the emerging RLDP. The site is located adjacent to existing development and meets the principles of 'facilitating developments which are sited in the right locations', as advocated by Planning Policy Wales (PPW) (paragraph 4.1.10).</p>	
<p><b>Evidence Base</b></p> <p>The LDP Demographics Report states that when considering growth outcomes, it is important to note that they have been developed during a period of unprecedented social and economic upheaval caused by Brexit and the COVID-19 pandemic, the full impacts of which are not currently fully understood. Alongside these factors, the full detailed results of the 2021 Census are expected in late 2022 / early 2023 which will provide an important update to the demographic evidence base for all local authorities. Once this is available, the report recommends that NCC should consider a range of demographic scenarios and updated assumptions informed by more accurate projections. Therefore, depending on when the next stage RLDP is published, it is expected that the Council will take into consideration any updates to population and growth predications, and as such, we reserve the right to comment further on any updated figures, once made available.</p>	<p>This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail. Updated evidence will be considered as this emerges over the course of the RLDP process.</p>
<p><b>Summary</b></p> <p>In summary, we broadly support the growth and spatial options proposed by the Council. We encourage the Council to adopt an approach that allocates the right sites in the right locations as advocated by PPW which can demonstrate that they are suitable, deliverable, and sustainable whilst also positively contributing towards the Council's housing delivery targets and placemaking principles.</p>	<p>Noted</p>

**GSO 062 - Redrow Homes (South Wales) Limited Pentre-poeth- 00640**

<p><b>GROWTH OPTIONS: Growth Scenarios –</b></p> <ol style="list-style-type: none"> <li><b>1. Are there any scenarios that have been discounted which should be considered further, and why?</b></li> <li><b>2. Which of the options do you feel is the most appropriate, and why? Assessment of Growth Options Against RLDP Objectives –</b></li> <li><b>3. Are there any other matters that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</b></li> </ol>
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The Council has identified several growth options which are to be tested to determine the most suitable and sustainable strategy for housing and employment growth up to 2036. The testing of a range of growth scenarios was commissioned independently by the Council, incorporating the latest demographic evidence (including the initial 2021 Census results), to assist with their assessment of the appropriate level of growth for the city.

The findings of The LDP Demographics report (September 2022), prepared as evidence base to support the emerging RLDP, shows that over the plan period Newport will experience population growth of between 4% and 14.9% (as estimated under the range of scenarios tested).

On a regional basis, the population of the Cardiff Capital Region (which includes Newport) is ageing, and it is likely that a quarter of the population will be aged over 65 years old by 2039. As such, the available workforce is shrinking, and the city of Cardiff is projected to be the only local authority in the region with a growing population aged 16-64 between now and 2039. Consequently, the Cardiff Capital Region City Deal is looking to create an additional 25,000 new jobs within the region.

A significant increase in the level of housing planned within the region is required in order to underpin the economic aspirations and opportunity provided by the City Deal.

The consultation paper acknowledges that when considering all eleven growth scenarios, some of these were deemed unreasonable and therefore discounted from assessment against the Integrated Sustainability Appraisal (ISA). The employment-led scenarios tended to result in a negative need for employment land over the plan period with outputs much lower than the adopted growth strategy. The consultation document also sets out that where scenarios have been assessed and result in a low scale of growth, these have been discounted from further assessment as they did not align with Newport's focus for growth.

Future Wales: The National Plan 2040, identifies Newport within a National Growth Area which will be the main focus for growth and investment in the south-east region (Policy 33). The Welsh Government supports an increased strategic role for Newport as a focus for sustainable long-term growth and investment. The Council's strategy to discount any scenario that resulted in a low scale of growth is therefore strongly supported given that this complies with national policy and continues to support the role Newport has to play in delivering growth for the south-east region.

The consultation paper also recognises that of the six growth scenarios taken forward for further assessment, these scenarios propose a wide range of potential housing and employment need. However, the Council acknowledges that new jobs need to be supported through housing growth as this is essential in enhancing Newport's economic role within the region and avoiding the need to commute outwards to work. We strongly support the Council's recognition that the delivery of housing is required to support jobs and prevent outwards commuting as for any economic growth strategy it is vital that housing growth underpins jobs growth as one cannot come forward without the other.

Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site's Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.

<p>We generally support growth options 1 (Dwelling-led 5YR), 2 (WG-2018-HIGHPOP) and 3 (Dwelling-led 10YR). These three growth scenarios also perform best against the emerging RLDP objectives of 'Economy and Employment', 'Population and Communities' and 'Health and Wellbeing'. We consider that to deliver against the Welsh Government's requirement for promoting Newport's strategic role, an increase in growth should be attributed to the city. It is also considered that apportioning a greater amount of growth to Newport will help manage the development pressures in the region by providing a strategic growth focus for the eastern part of the south-east region, in accordance with the requirements of Future Wales.</p> <p>In addition to directing development towards Newport as a National Growth Area, national policy also requires development to be sustainably located with easy access to public transport and other public services. In accordance with policy, the site which is the subject of this representation is suitable for delivering a range and choice of housing (including affordable housing) in a sustainable location adjacent to the settlement boundary of Newport at Bassaleg. The previous UDP Inspector also found this area of Newport suitable for growth. This can contribute towards the resilience of the RLDP's housing trajectory, the effectiveness of the emerging plan and aid towards defining Newport as a strategic growth area.</p>	
<p><b>SPATIAL OPTIONS:</b></p> <p><b>8. Which of these options do you feel is the most appropriate, and why?</b></p> <p><b>9. Are there any other spatial distributions that should be considered, and if so, why?</b></p> <p><b>10. Are there any other matters that should be given consideration when assessing these?</b></p>	
<p><u>Spatial Options</u></p> <p>The Council's Growth and Spatial Options Paper sets out several spatial options available for supporting the delivery of new growth in Newport up to 2036. One spatial option considered is prioritising the re-use of previously developed land (PDL). Although we do not necessarily oppose this option, it should be recognised that there is a lack of suitable, viable and deliverable brownfield sites within the city. Therefore, the release of greenfield land is required to meet the need for new housing. The greenfield site which is the subject to this consultation response is free of any major constraints and is sustainable located adjacent to the settlement boundary of Bassaleg such that the site is available and deliverable for residential development.</p> <p>An urban expansion option is being considered as part of preparing the RLDP. In terms of taking an urban expansion approach, the consultation document explains that this would require the identification of land on the edge of the urban boundary which is generally supported.</p> <p>In terms of the village option, Bassaleg is not listed as a village but under the hybrid option, the supporting text states that the hybrid approach would include a mix of previously development land, sites on the edge of the urban boundary and sites at surrounding existing villages. Should the village option being take forward by the Council, then Bassaleg should also be identified as an existing village. Should this change be made then we would be generally supportive of this option.</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.</p> <p>The Deposit Plan will include a review of the urban and village boundaries.</p>

<p>The Council also propose a ‘hybrid’ spatial option to accommodate future growth. This would include a mix of previously developed land, sites on the edge of urban boundary and sites at surrounding existing villages. This approach is generally more supported over the other spatial options as it provides greater flexibility for allocating the right sites in the right locations to deliver development that addresses local and regional need.</p> <p>Our site ‘Land at Pentre-poeth’ is located adjacent to the existing settlement boundary and is free from any overriding unresolvable physical constraints, including infrastructure and utilities, access, ground conditions, landscape, heritage designations, flood risk issues and pollution. The site is also not located within a Phosphorus Sensitive Catchment Area and can be delivered early in the plan period to contribute towards the resilience of the RLDP’s housing trajectory. Given the site is sustainably located and accords with the objectives of the emerging RLDP, the allocation of the site would therefore contribute to the soundness of the plan through assisting with its effectiveness.</p> <p>Overall, we encourage the Council to ensure that sites allocated for residential use are assessed on a site by site basis. Our site is sustainably located, deliverable and considered worthy of allocation in the emerging RLDP. The site is located adjacent to the existing settlement boundary and meets the principles of ‘facilitating developments which are sited in the right locations’, as advocated by Planning Policy Wales (PPW) (paragraph 4.1.10).</p>	
<p><b>EVIDENCE BASE:</b></p> <p><b>11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</b></p> <p><b>12. Are there any other comments you’d like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</b></p>	
<p><b>Evidence Base</b></p> <p>The LDP Demographics Report states that when considering growth outcomes, it is important to note that they have been developed during a period of unprecedented social and economic upheaval caused by Brexit and the COVID-19 pandemic, the full impacts of which are not currently fully understood. Alongside these factors, the full detailed results of the 2021 Census are expected in late 2022 / early 2023 which will provide an important update to the demographic evidence base for all local authorities. Once this is available, the report recommends that NCC should consider a range of demographic scenarios and updated assumptions informed by more accurate projections. Therefore, depending on when the next stage RLDP is published, it is expected that the Council will take into consideration any updates to population and growth predications, and as such, we reserve the right to comment further on any updated figures, once made available.</p>	<p>This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail. Updated evidence will be considered as this emerges over the course of the RLDP process.</p>
<p><b>OTHER COMMENTS</b></p>	
<p>I write on behalf of Redrow (South Wales) Ltd to provide a response to Newport City Council’s (NCC) Growth and Spatial Options consultation in preparation of the Replacement Local Development Plan</p>	<p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can</p>

<p>(RLDP) 2021-2036, in relation to land at Pentre-Poeth Road, Bassaleg, Newport (the site) as outlined on the plan below [MAP]</p>	<p>be found in the Candidate Site’s Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>
<p><b>Land at Pentre-poeth, Bassaleg</b></p> <p>The site totals circa 25 acres and is considered to represent a logical sustainable extension to Bassaleg which could deliver circa 250 new homes. The site presently comprises former nurseries and fields. Trees, hedges, walls and fencing bound the site and the enclosures within it. The site is inward facing and slopes gently towards a stream which flows through the site. The site occupies a semi-rural setting on the outskirts of the wider built-up area of Bassaleg with good access to nearby community, education, commercial and employment centres. PROWs cross the site which can be incorporated into master planning proposals for the site.</p> <p>The site is considered to be sustainably located being situated adjacent to the National Cycle Route 4 which runs along the northern boundary of the site and this route is also designated as an Active Travel route by Newport City Council. Bus stops are located within 400m of the majority of the site. Bus routes provide services along Caerphilly Road and Forge Lane and provide services to Caerphilly, Newport, Cardiff and the Valleys. Services are frequent and cater for commuters. The site is located circa 1.5 miles from Pye Corner train station which provides hourly services to Cardiff. In terms of vehicular access, the site is accessible from the local highway via Pentre-poeth Road or Griffin Road both of which connects to A468. Junction improvements works will be required to support development, which will form part of the development proposals.</p> <p>Most existing and new employment opportunities in Newport are to the west of the city. These are within easy accessibility of the site. Many community services are easily available – Bassaleg Comprehensive, Pentre-poeth Primary School, local pubs and restaurants, shops, children’s play area, playing field, community centre, allotments, church and cemetery.</p> <p>As is evidenced by the extracts from the Adopted LDP Proposals Plan and Constraints Plan, whilst the site currently sits within a Special Landscape Area, it is located adjacent to the existing settlement boundary and the site is free from any other planning constraints and any overriding unresolvable physical constraints, including infrastructure and utilities, access, ground conditions, landscape, heritage designations, flood risk issues and pollution. Therefore, the site is considered to be deliverable early within the Replacement LDP timeframe with no significant enabling works required.</p> <p>With regards to the site falling within a Special Landscape Area, this is a local designation and should be reviewed through the LDP replacement process. Furthermore, the site benefits from a local landform with an inward facing nature meaning that any development would not be widely visible from the open countryside.</p>	<p>Candidate Site assessments are being carried out as part of a separate process. The results of the Stage 1 assessment can be found in the Candidate Site’s Register. Stage 2 of the assessment will be published as part of the Preferred Strategy consultation.</p>

A Minerals Safeguarding Area is located adjacent to the southern boundary of the site, but this is not considered to present a constraint to the development of the site. Whilst an Air Quality Management Zone is located within Bassaleg, it is considered that appropriate mitigation measures can be incorporated into any development proposals for the site.

Adopted LDP Proposals Map

[MAP]

Adopted LDP – Constraints Map

[MAP]

It should also be noted that the land was promoted in the Newport UDP and was found by the Inspector to be suitable and deliverable for housing purposes but that it was not needed due to the brownfield land supply proposed by the Council within that plan. It was also promoted through the currently adopted LDP process but due to the Council continuing with the progression of a brownfield strategy, the site was not considered for allocation. However, it is now acknowledged by the Council that due to the success of their brownfield strategy, greenfield releases will be required to support the level of growth required in Newport over the next plan period. In this regard, the site is immediately available for residential development, with the site being technically deliverable and free from legal constraints. The UDP Inspector stated that in planning terms it is a desirable site which can deliver much needed open market and affordable new homes in Newport.

Whilst the site was not submitted during the Call for Site in August 2021 but given the time lapsed, we are now in a position to make this submission and hence the submission of this representation. It is also felt that due to the unforeseen delays with the Replacement LDP process, that the Council should undertake a Second Call for Site alongside the Preferred Strategy Consultation to ensure that the Council allocate the most suitable and deliverable sites within the emerging Replacement LDP. Candidate site details can be submitted for the land should NCC wish to review them at this stage. Redrow are also willing to work with other landowners in the wider area to the comprehensive development of the area, maximising benefits for the local community. The map appended (South and West Bassaleg Land Ownership shows the potential extent of the wider area.

Direct comments on the Growth and Spatial Options, January 2023 are set out in the attached consultation form, along with the above site information in the 'Any other comments' box. In summary, we broadly support the growth and spatial options proposed by the Council and support the need for growth in Newport to achieve the aspirations of Future Wales. We encourage the Council to adopt an approach that allocates the right sites in the right locations as advocated by PPW which can demonstrate that they are suitable, deliverable, and sustainable whilst also positively contributing towards the Council's housing delivery targets and placemaking principles.

We reserve the right to comment further at the Preferred Strategy stage specifically in relation to the site selection process although we consider the site to be sustainably located and deliverable such that the site is considered worthy of allocation in the RLDP.

**GSO 063 - Alan Cunningham - 00843**

Question / Response	Officer Response
<p>I am writing in support of the proposed plans to build a train station in Caerleon. As a resident of this town, I believe that a train station would bring numerous advantages to the community and improve the overall quality of life for those living and working here.</p> <p>1. Sustainable transport: A train station would provide an environmentally-friendly mode of transportation for commuters, reducing the number of cars on the road and easing traffic congestion. Currently, many commuters in Caerleon rely on cars to travel to work, leading to traffic jams and increased pollution. A station would help to reduce air pollution, which is an increasingly important issue in today's world.</p> <p>Another key advantage is access to the national cycle path. This would provide a safe and convenient way for people to cycle to and from the station, promoting active and healthy lifestyles.</p> <p>2. Improved transport connections: A train station would increase connectivity and accessibility for residents, enabling them to easily travel to other parts of Newport, as well as to other cities such as Cardiff and Bristol. This would help to open up new job opportunities and improve access to healthcare and education.</p> <p>3. Economic growth: A train station would help to boost the local economy, bringing more tourists and visitors to Caerleon. This would provide a much-needed boost to local businesses, creating new jobs and driving economic growth in the area. The station would also provide an easier and more convenient way for tourists to visit Caerleon's historic landmarks and attractions, such as the Roman amphitheatre and the National Roman Legion Museum.</p> <p>I understand that plans for the train station were taken out in 2015, and I strongly urge the council to include the building of the station in their plans. The benefits of a train station for Caerleon and the wider region are significant, and I believe that it is a valuable investment in the future of the area.</p> <p>In summary, I believe that building a train station in Caerleon would have numerous benefits for the local community, including improved transport links, reduced traffic congestion, enhanced access to job opportunities, education and healthcare, and increased economic growth. I therefore strongly support the proposed plans and urge the council to move forward with this project.</p> <p>Thank you for considering my views on this matter. I urge you to support the building of a train station in Caerleon, and I look forward to hearing about the progress of the consultation.</p>	<p>The Newport Local Development Plan currently includes policy T1, which supports all proposals for new stations, including a station at Caerleon. The role of the Local Development Plan is to facilitate new and improved stations, but it does not directly allocate these or determine the location of new stations.</p> <p>As part of this process the LDP team will continue to work with partners, including Welsh Government and Transport for Wales, during the preparation of the replacement LDP to ensure any amendments to policy T1 reflect the opportunities identified by the appropriate transport strategies and that our development strategy seeks to support the delivery of strategic and local transport improvements.</p>

Question / Response	Officer Response
<b>Growth Options</b>	
<b>1. Are there any scenarios that have been discounted which should be considered further and why?</b>	
Not that I am aware of.	Noted
<b>2. Which of the options do you feel is the most appropriate, and why?</b>	
Option 6 offers the most positive responses to the objectives set. The downside is less housing completions and potentially less employment opportunities.	Noted
<b>3. Are there any other matter that should be taken account of when assessing these scenarios and identifying a Preferred Strategy?</b>	
Following on from (2), the number of large housing developments currently paused or having futher potential needs to be taken into account. Likewise, there does not seem to be a shortage of potential employment land, based on previous and current scenarios.	Noted, the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers provide greater detail on this.
<b>Employment Land Options</b>	
<b>Recommendation One -</b>	
<b>4. Is the requirement appropriate for Newport?</b>	
This would appear appropriate, based on past and current projections.	Noted
<b>5. Should it be different and if so, why?</b>	
No.	Noted
<b>Recommendation Two -</b>	
<b>6. Should some sites be removed from the employment supply? Why?</b>	
Possibly. It seems that some sites would lend themselves to regeneration, which would reduce the need for other sites to be developed.	Noted
<b>7. Should alternative land uses be considered for some sites? Please provide examples of such uses and your rationale for this.</b>	
Possibly.	Noted
<b>Spatial Options</b>	
<b>8. Which of these options do you feel is the most appropriate, and why?</b>	
I support use of previously developed land and re-purposing of redundant buildings.	Noted
<b>9. Are there any other spatial distributions that should be considered, and if so, why?</b>	
I strongly feel that re-use of empty/redundant buildings needs to be progressed, particularly in the city centre where there is a lot of unused space. This comment is also appropriate to the wider city built environment, for example in Pill, Caerleon and Chepstow Woods areas.	Noted
<b>10. Are there any other matters that should be given consideration when assessing these?</b>	
Following on from (9), this redevelopment would need appropriate public transport arrangements, to reduce the need for parking space.	The role of the Local Development Plan is to facilitate new and improved services, but it does not directly allocate these or determine the location.



	<p>As part of this process the LDP team will continue to work with partners, including Welsh Government and Transport for Wales, during the preparation of the replacement LDP to ensure policy reflect the opportunities identified by the appropriate transport strategies and that our development strategy seeks to support the delivery of strategic and local transport improvements.</p> <p>This assessment was produced for the purpose of the Growth and Spatial Options consultation, however the Integrated Sustainability Appraisal (ISA) assesses these in more detail.</p>
<p><b>Evidence Base</b></p>	
<p><b>11. Are there any other pieces of evidence that you believe should inform the development of the preferred growth and spatial options strategies?</b></p>	
<p>Continuing from items (9) and (10), it would seem that local area developments of building re-use needs to be more widely progressed. There are some good examples of this around and coming on Stream, the city needs a lot more of them.</p>	<p>Noted</p>
<p><b>12. Are there any other comments you'd like to make regarding anything within this consultation document? Do you agree with the Objectives for the RLDP? If not, how and why do you think they should be changed?</b></p>	
<p>Broadly, I agree with the general direction of the RLDP. It must by it's very nature be a compromise of many factors.</p>	<p>Noted</p>

**GSO 065 - Mrs P Tyers - 00210**

Question / Response	Officer Response
<p>I am sorry I could not attend the meeting on Thursday 16th February at Rhiwderin Community Centre. I believe no building plans for Bassaleg or Rhiwderin should be considered, as the traffic noise and pollution levels are very high according to Mr Steve Manning Environmental Officer. People's health is suffering. Young children are in haling the fumes from the lorries.</p> <p>Areas which should be considered are the left hand side of the A48 towards Chepstow and Coldcliffe areas. They are near the M4, thus relieving the congestion on the 'A' roads through the villages.</p> <p>Renovating empty properties and converting empty shops into flats would be cheaper than new builds. The infrastructure e.g. roads would already be there.</p>	<p>Noted, Section 5 of the G&amp;SO indicates the spatial distribution options which are considered to be broadly realistic for the RLDP. These options have been derived through an application of national policy principles with relation to prioritising the reuse of previously developed land, as well as an early understanding of land availability and the need to support rural communities within the authority area.</p> <p>The options have been assessed at a high level in relation to their contribution to the emerging objectives of the plan, including:</p>

	<p><i>“Population and Communities - To provide high-quality homes that meet the needs of Newport, as a national growth area, and to ensure that these homes are supported by the necessary social, environmental, cultural and physical infrastructure to provide safe and healthy places for people that maintain and enhance community and settlement identities.</i></p> <p><i>Transport and Movement - Reduce the need to travel and increase the use and provision of sustainable travel options.</i></p> <p><i>Climate Change - To ensure that development and land uses in Newport are resilient to the effects of climate change, and actively tackle the causes and impacts of climate change through minimisation, adaptation and mitigation.”</i></p> <p>The issues of traffic, air quality and pollution will be considered in further detail as the plan progresses.</p>
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**GSO 066 - Ken Soale - 00529**

<b>Question / Response</b>	<b>Officer Response</b>
<p>I wish to raise my concerns that more housing development might take place in the Rogerstone area. I understand that you are looking at Newport area as a whole, but I am not familiar enough with the other areas of Newport and can only comment on the area I live in.</p> <p>Rogerstone has already seen a great deal of housing dev. in the recent years i.e. Power Station site and Alcon site where hundreds of new houses have been built, as well as a number of smaller estates around Rogerstone, these have put a strain on Public Services i.d. Doctors, Dentists, Schools, and Road Traffic, Parking in the area, etc.</p> <p>My main concern is that any more development should only be allowed on 'Brownfield sites', and to keep existing 'Greenfield sites' for the enjoyment of everybody, these places are few and we should keep them to maintain a balance of green space for wild life to flourish which enrich our lives and provide a barrier from other councils.</p>	<p>Noted, Section 5 of the G&amp;SO indicates the spatial distribution options which are considered to be broadly realistic for the RLDP. These options have been derived through an application of national policy principles with relation to prioritising the reuse of previously developed land, as well as an early understanding of land availability and the need to support rural communities within the authority area.</p>

I understand houses need to be built but for the benefit of the people of Rogerstone, the countryside and its wildlife, please can house building be restricted to Brownfield sites.	
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**GSO 067 - Bethan Bowden - 00842**

Question / Response	Officer Response
<p>I have focused on the spatial options as this is more easily viewed with a public health lens. However, the options paper has already considered and reflected on the issues that I would typically address that would include:</p> <ul style="list-style-type: none"> <li>- opportunity to utilise active transport networks and</li> <li>- accessibility/connectivity to public transport hubs to facilitate the modal shift away from car usage</li> <li>- air quality management in view of existing poor air quality in Newport</li> <li>- community connectedness within established communities to enhance wellbeing</li> </ul> <p>It was great to see such consideration of these issues already within the RLDP.</p> <p>In response to the specific questions around spatial options within the consultation, I would be supportive of a hybrid approach. I appreciate the challenges of the balance of growth within this option but it could seek to maximise the factors identified above in supporting existing communities resilience and connectedness, with opportunity to develop sustainable transport and travel options.</p> <p>I am not aware of a process within the Health Board for responding to non-statutory consultations so just to clarify that I am responding on a personal level and this is not a response on behalf of the Health Board.</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.</p>

**GSO 068 - Monmouthshire County Council - 00031**

Question / Response	Officer Response
<p>Many thanks for consulting with Monmouthshire County Council on the Newport City Council Local Development Plan Growth and Spatial Options. We have read the relevant documents with interest and have no specific comments to make at this stage. We will be happy to continue working with you collaboratively on both regional and cross boundary issues as the RLDP progresses.</p>	<p>Noted. We look forward to working collaboratively as our respect plans progress.</p>

**GSO 069 - Campaign For The Protection Of Rural Wales - 00035**

Question / Response	Officer Response
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The document details the options of six different growth options and three different spatial strategies. Future Wales: National Plan 2040 Wales provides the necessary national policy framework for the document. In obtaining evidence to support the various housing and employment growth options NCC commissioned Democratic Evidence, Edge Analytics to support the options presented.

**CPRW makes the following points:**

**1. The structure of the report could be presented in a more effective way to tease out the issues facing Newport.** The various growth options have been matched against RLDP objectives. The actions required to achieve each objective are difficult and complex and include factors other than the growth of employment and housing numbers- important though these are. The plan might be better constructed by listing the minimum requirements of each objective and then listing the requirements to achieve it, including , of course, employment and housing growth.

For example, a major objective relates to climate change. The need to reduce carbon emissions by shortening commuting journeys and providing either public transport or facilitating shorter journeys by walking and cycling are issues which the plan should address at this stage and not as bolt on bits later in the planning process.

Building resilience to climate change is key and whether it is possible now to mitigate future problems and hence reduce future costs. Rising sea levels will at some stage have a significant impact on Newport. Although it maybe some time before areas of Newport are affected by sea level rise, the financial impact and the impact on the economy will be felt much sooner. A house purchased now in a potential at risk area will become an asset of diminishing value even if a flood event may not occur for 80 years the value of the house will diminish over any long period of ownership. A similar consideration will apply to commercial premises and infra-structure. These are very major problems that will have to be faced, beginning to deal with them now rather than delaying may possibly enable them to be managed. The focus should start here!

**2. The source data of the report is oversimplified, more detail might bring out clearer options.** Producing growth options by numbers of dwellings without estimating the mix of housing does not provide sufficient information. There are differences in terms of possible locations, costs and land take and other planning constraints between, for example, a one-bedroom flat and a four bedroom house with a garden. Perhaps these factors have been assessed and the report shows only high-level information. In which case further information on the estimated total land required for each option would have been useful to provide in order to more fully understand and comment on the impact of each option.

**3. Necessary constraints to development have not been clearly set out in the document and consequently the options presented are difficult to evaluate.**

Noted, the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers provide greater detail on this.

As part of this process the LDP team will continue to work with partners, including Welsh Government and Transport for Wales, and other authorities during the preparation of the replacement LDP to ensure any amendments to policies reflect the opportunities identified by the appropriate transport strategies and that our development strategy seeks to support the delivery of strategic improvements.

**a) The provision of water supplies** The pressures on water consumption has been detailed under RLDP objective 'Natural Resources' for growth options 1 to 3. To have an informed view there needs to be understanding of how this problem would be alleviated and at what cost. There is an assumption that the immediate costs of housing development would be met wholly or partly by the developer. Is such funding feasible for meeting the cost of additional water supplies? If so what would be the knock-on consequences on the proportion of social housing in the developments affected (also a cost to the developer) and other costs to which the developer may be asked to contribute? If there is a need for a new reservoir at these levels of growth are these options viable? If we are going to build resilience against future climate change how would this impact?

**b) Power requirements** What is the impact on power requirements in the proposed plan. If there was a proposal for a large data centre or another high commercial user of electricity in Newport, what would be the affect on other potential users? Housing development elsewhere has been stalled due to the power requirements of data centres.

**c) The Green belt**

Future Wales includes a new greenbelt which runs from Caerphilly to Chepstow. This has been marked on the maps provided in the Growth and Spatial Options document. In the future the precise boundaries of such a designation would be included in the Strategic Development plan for the Cardiff City area which, it is envisaged, would be prepared before the local development plans. However, the first Strategic Development Plan is due to be finalised after this Newport RLDP has been completed. It is important that the boundary of the greenbelt should be decided at an early stage of the RLDP (not withstanding the fact that the Strategic plan will not be complete). If this is not done then there is a risk that development plans will be developed first and the greenbelt boundary made to fit around these. The landscape values of the greenbelt should be established first.

**d) The Gwent Levels**

The Gwent Levels are an area of major significance from an historical landscape and biodiversity perspective. The Levels are a unique manmade landscape established since Roman times. They are under significant pressure from solar farm proposals and encroachment by other development. Growth options detailed that might impact adversely on the Levels might include village expansion and possibly employment land. The unique nature of the Gwent Levels and the threats it faces have been recognised by the Welsh Government. As a result, the Levels will be subject to strategic planning guidance under Future Wales Policy. This is currently in the process of being developed. Three local authorities have responsibility for the Levels including Newport and there needs to be co-ordination between each to ensure adequate protection for this important landscape.

Significant emissions are caused by traffic congestion. The decision made (correctly in our view) not to build the M4 Relief road means that there are capacity constraints on the existing motorway. It is important that the impact of any increased traffic generation is managed closely. Failure to develop local

employment, which would tend to reduce traffic, must be a constraint on the level of housing development.

**4. There is no consideration of the plans of other local authority areas.**

Although Welsh local authorities need to comply with Future Wales: National Plan 2040 and other planning guidance, how this is done may conflict with the implementation of the Newport RLDP. Development of greenfield sites in Monmouthshire could, for example, impact on the viability of development sites in Newport. This may especially affect the ability to develop Previously Developed Land in Newport if other more attractive (from the developer's perspective) sites were made available in Monmouthshire.

The number of new homes built in Bristol has not kept pace with its population growth- 10% between 2010 and 2020, higher than the national average- adding fuel to that city's housing crisis.<sup>3</sup> People working in Bristol are looking to Newport to live as there are insufficient homes nearer the city. Whilst this would tend to increase the number of commercially viable development sites in Newport it would also encourage longer distance commuting and would be contrary to the environmental and wellbeing objectives set out in Future Wales. This simply adds to the proliferation of dormitory estates in Newport (and also south Monmouthshire).

**5. Spatial Options- Village Focus** We object to developments to village boundaries other than appropriate in-filling within the existing boundaries whether this was within the village focus spatial option or within the Hybrid spatial option.

Significant release of land for development on greenfield sites around villages are likely to compromise other planning objectives such as an increase in commuting and the higher costs of supplying necessary infrastructure from water to transport.

The extension of existing village boundaries to develop adjoining fields may cause difficulty in limiting future inappropriate expansion as there may be no clear and logical boundary for the new expansion. Inappropriate expansion of new housing adjacent to working farms can cause difficulty especially where livestock is managed close to residential areas- sheep worrying etc.

**6. Conclusions**

Closer attention needs to be made to environmental issues and constraints in the production of the final plan. Within environmental constraints the plan should be employment led to minimise commuting and to gain maximum benefit for local communities.

There are constraints on development for which further information should have been provided in the consultation document ( e.g., water supplies) so that a more informed response could have been made. Previously Developed Land should have priority for development within Newport and there should be co-ordination with adjacent local authorities to avoid competition for development.

Question / Response	Officer Response
<p><b>Growth Options</b></p> <p>Qu.2 Option 1 is the most appropriate option. This is the only option which provides an annual build rate above that previously achieved by the current plan, if the plan is to be aspiration and meet the requirements of its allocation in the National Growth area this level of development should be the minimum proposed.</p> <p>Qu.3 The role of the strategy to meet wider policy requirements of the National Plan and PPW, most importantly Newport's position in the National Growth Area.</p>	<p>Noted. The Growth Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated Background Papers.</p>
<p><b>Spatial Options</b></p> <p>Qu. 8 The Hybrid Option is considered most suitable. As it gives the most flexibility to provide a range of sustainable growth and best mirrors the diverse nature of the LPA. It is also understood that relying solely on PDL development with the urban areas has a number of constraints including ongoing uncertainties over the revised TAN15 Flooding. Further the Urban Expansion option is currently constrained by uncertainty over the boundary of the Green Belt required by the National Plan.</p>	<p>Noted. The Spatial Option taken forward is discussed in detail in the Preferred Strategy Cabinet Paper, the Preferred Strategy Consultation Paper and associated background papers.</p>



Planning Aid **Wales**  
Cymorth Cynllunio **Cymru**

## **Community Engagement**

### **Newport Replacement LDP Growth and Spatial Options**

#### **Engagement Events Report**

June 2023

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## 1.0 Context

1.1 Planning Aid Wales has been instructed by Newport City Council (NCC) to support the engagement activity for the Newport Replacement Local Development Plan (LDP) – Growth and Spatial Options Consultation.

1.2 Our instructed brief was to prepare and deliver a series of community and stakeholder engagement events between 25 January – 8 March 2023, in accordance with NCC's Delivery Agreement. The events were targeted at identified stakeholders living or operating within the Newport City Council area. A mixture of online and face to face events were carried out. The online events were carried out remotely using the Microsoft Teams platform.

1.3 To deliver the brief our work involved:

- Analysis and understanding of the Growth and Spatial Options consultation paper.
- Review of other key documents and activities including the Delivery Agreement, previous LDP engagement activities, previous barriers identified, key stakeholder contacts etc. and discussions with NCC Planning Policy Team as required.
- Selecting, defining objectives and programming methods of engagement for the events.
- Attending and leading all events as facilitators for discussions and to encourage understanding of the LDP process and the Growth and Spatial Options consultation. The broad purpose of the events was to raise awareness and encourage responses to the Growth and Spatial Options consultation which had a deadline on Wednesday 8 March 2023.

1.4 In relation to the events our role was:

- (i) To arrange suitable dates and venues, where applicable, for the events. Send invitations to interested parties to attend events.
- (ii) Introduce the purpose, aims and key stages involved in the LDP preparation process.
- (iii) Explanation of the key themes and proposals put forward in the Growth and Spatial Options consultation document.
- (iv) Facilitate a discussion to capture initial feedback on the Growth and Spatial Options consultation document.
- (v) Advise on next steps and how communities / stakeholders can input into the process.
- (vi) Prepare a report of feedback and issues raised for NCC Planning Policy Team.

1.5 As part of the process the following work was carried out by the Council:

- (i) Provision of all relevant planning documents and stakeholder list.
- (ii) Provision of details of the Growth and Spatial Options consultation document.

1.6 The role of Planning Aid Wales in drafting the issues report is to report back the issues and comments raised by attendees at each event. Therefore, the issues and comments listed within this report are solely those of the attendees who attended each event and do not represent the views of Planning Aid Wales.

## **2.0 About Planning Aid Wales (PAW)**

- 2.1 Planning Aid Wales is a registered charity that advocates and supports community involvement in planning in Wales. Founded in 1978, we have over 40 years' experience of helping individuals and community groups to understand and engage with the planning system. Our core services include delivering planning training to a range of audiences, developing easy read planning guidance and a free planning advice helpline. We are an organisation that has been commissioned for many community engagement planning projects in Wales; we have built a significant repository of engagement methods, tools and techniques and regularly publish news on good engagement practice.
- 2.2 We recognise LDP preparation is an important avenue for securing more effective public involvement in planning; our current business plan identifies LDP review as one of the three elements in the planning process on which we focus our engagement efforts.
- 2.3 Planning Aid Wales is an advocate of meaningful community engagement in planning. Through our work, we seek to raise the knowledge and capacity of communities to engage, but not just in the activity at hand - we seek to enable people to effectively participate in planning activities on an ongoing basis.
- 2.4 As an independent third party organisation, we have found time and again that communities are willing to engage with us, even where Local Planning Authorities have encountered barriers to engagement in the past. As part of our process, we encourage active collaboration between Local Planning Authority (LPA) staff and community groups, thereby building better relationships for future engagement. We take no view on any local policy or specific development; we only support individuals and communities to express their own views effectively.
- 2.5 We recognise that the planning system can be complex and the needs / wants of communities do not always align with other interests. We manage expectations by helping our beneficiaries understand that planning is a holistic system that seeks to address a wide variety of priorities, and clearly explain the scope and limitations of what the planning system (or particular activity) can achieve.

### 3.0 Stakeholder Growth and Spatial Options Engagement Events

3.1 Given the number of individuals and organisations listed on the Council's Stakeholder list, at the time of the current engagement work, and the additional organisations identified, it was decided to invite all to attend any of the advertised events. It was considered that this would provide a cross section of views and discussion. The following is a broad list of the groups that make up the stakeholders:

- Community Councils
- Gypsy and Traveller Organisations
- Heritage and Cultural Organisations
- Transport and Utilities
- Environment and Rural Organisations
- Developers and Development Consultants
- Community Groups and Organisations
- Individuals/ Residents

3.2 The events were advertised using an online booking system. In addition, the engagement activities were advertised on the Council's website, social media posts, newsletters and also promoted by other organisations.

3.3 Ten events were held, and the groups invited to eight of these events, two events were arranged by a specific group, NCC Community Councils Group and Newport Youth Council. A mixture of online and face to face events were held, four events being online and six face to face events. The timing of the events was varied to allow for wide participation i.e. morning, afternoon and evening sessions. The date and format of the events is listed below:

- |     |                             |           |                  |
|-----|-----------------------------|-----------|------------------|
| 1.  | Online                      | Morning   | 14 February 2023 |
| 2.  | Rhiwderin Community Centre  | Evening   | 16 February 2023 |
| 3.  | Caerleon Town Hall          | Afternoon | 21 February 2023 |
| 4.  | Newport Centre              | Evening   | 21 February 2023 |
| 5.  | Ringland Community Centre   | Afternoon | 22 February 2023 |
| 6.  | Pill Millennium Centre      | Evening   | 22 February 2023 |
| 7.  | Online                      | Afternoon | 23 February 2023 |
| 8.  | Newport Youth Council       | Evening   | 24 February 2023 |
| 9.  | Online                      | Evening   | 28 February 2023 |
| 10. | NCC Community Council Group | Evening   | 7 March 2023     |

3.4 It was agreed with NCC at the outset of the project that the Planning Policy Team would not attend the events to allow for an independent discussion of issues.

### **Format of events**

- 3.5 All events followed a similar format. Mark Jones, Planning Engagement Officer, Planning Aid Wales, introduced the event and provided an explanation of Planning Aid Wales and their role as independent facilitators for the event. The main presentation covered:
- Current position of Replacement LDP in Newport
  - Introduction to the Growth and Spatial Options consultation document
  - Growth Options
  - Employment Land Options
  - Spatial Options
  - How to respond and next stages
  - Conclusion
- 3.6 At the end of the initial part, a brief question and answer session took place to address any issues on the process. Mark Jones then delivered a more detailed presentation on the content of Newport Growth and Spatial Options consultation document. In addition, there was also a discussion on wider issues raised by the attendees. Questions were invited and where possible responded to, the issues raised were also noted for inclusion within this report. Planning Aid Wales participated in all the discussions to listen to the issues raised and also to pose queries to facilitate discussion.
- 3.7 The event concluded with Planning Aid Wales repeating the deadline for comments on the Growth and Spatial Options consultation of 8th March 2023. It was emphasised that this was an appropriate time to make meaningful comments to influence the LDP as once the document moves forward the opportunity to influence the plan will become less. Attendees were also advised that an independent inspector would examine the plan on behalf of the Welsh Government and prepare a report on the soundness of the plan.

### **Event attendance**

- 3.8 All stakeholders and residents listed on the Council’s Stakeholder list, at the time of the Growth and Spatial Options consultation engagement work, and any additional organisations identified, were invited to attend at least one event, invitations were sent by email and letter. A copy of the invite is included in Appendix 2. A total of 1300 invites were initially sent; further invites were sent to stakeholders who registered their interest on the Council’s database before the conclusion of the events. In addition, the advertisements of the engagement work on other sources also attracted interest and attendance. Follow up contact was also made with stakeholders to highlight the events. The table below summarises the bookings and attendance at each event:

<b>Event</b>	<b>No. Bookings</b>	<b>No. Attending</b>
--------------	---------------------	----------------------

14 February 2023	13	13
16 February 2023	23	35
21 February 2023 (afternoon)	30	23
21 February 2023 (evening)	14	5
22 February 2023 (afternoon)	8	8
22 February 2023 (evening)	4	2
23 February 2023	18	21
24 February 2023	N/A	8
28 February 2023	21	13
7 March 2023	N/A	7



## 4.0 Summary of Issues Raised

4.1 The events generated a number of views and identified a number of issues from all participants and these are listed in Appendix 1 of this report. In summary, there were a number of common issues which are summarised below under the following broad headings of the Growth and Spatial Options consultation:

- Growth Scenarios.
- Employment Land.
- Spatial Options.

4.2 It is noted that a number of respondents made similar comments to those that were raised at the Vision, Issues and Objectives consultation. Furthermore, it was apparent that a significant number of attendees had not read the consultation paper before attending the event. In addition, there were a number of comments made at various events in relation to the following matters:

- Knowledge and understanding – a number of respondents felt that on issues such as growth scenarios and employment land issues, that they did not have enough experience or understanding to comment fully on the scenarios put forward by Edge Analytics. This was also a caveat to the comments that were made by respondents. Therefore, a number of comments made relate more to their opinion on the concerns and issues facing Newport and how this would relate to any future growth.
- The demographic date used - It was suggested that the demographic data used in the assessment appear was based on 2020 ONS data, the Welsh Government have issued updates since this report. Therefore, it was felt that some of the information in the growth scenarios is out of date. Across Wales population growth predicted in previous LDPs in Wales have not come to pass and most LPAs have had to scale down their LDPs in light of the Welsh Government data from 2020.
- Consultation Approach – It was argued that the approach to discard some of the initial growth scenarios is not appropriate. If this is an options based approach to consider the growth scenario, it is not considered to be growth options consultation if some options already discarded. It was accepted that Policy 33 of Future Wales promotes sustainable long term growth but Policy 9 of Future Wales recognises the importance of national natural resource management areas and the sustainable management of such areas. The Gwent Levels is specifically mentioned as a key strategic resource and is one of only 6 national areas. Therefore, there is a caveat against the underpinning that the current document provides long term growth is in conformity with Future Wales 2040.
- Candidate Sites – a number of respondents commented on the lack of information on candidate sites and why this information is not released now. Comparisons were made to a neighbouring authority. There was a feeling that attendees could not comment on growth unless they knew the sites that were going to be proposed, there was also a feeling that the development sites were already known by the Council. *(PAW responded by advising this was not the case and again explained the process of the LDP and also the process involved in assessing candidate sites. A*

*particular point clarified was that candidate sites were those put forward by anyone and are not sites put forward by the Council. Finally, it was also explained that the approach adopted by NCC was not uncommon in our experience of engagement on other LDPs).*

### **Growth Scenarios**

- 4.3 There was a general acceptance that there was a need for growth in the Newport City Council area. The role of Newport in relation to Welsh Government policy in Future Wales 2040 was also acknowledged. Although it was also noted that some attendees suggested that Future Wales policy in relation to growth should not be read in isolation and consideration was required for Welsh Government policy statements such as in relation to environmental protection e.g. The Gwent Levels.
- 4.4 Following, the above policy point, generally, it was considered that there was a need for housing and employment land, however, at the same time any growth strategy must recognise other constraints such as environmental designations and climate change.
- 4.5 The level of growth and which was the best growth scenario was considered to be difficult to identify, as many attendees did not feel they had sufficient information or a full understanding of how such scenarios are calculated.
- However, when considering any growth scenario it was considered important to have regard to existing issues such as traffic congestion, public transport availability and hubs and other infrastructure issues such as school capacity and medical facilities.
- 4.6 Generally there was no objection to reduction in growth scenarios for more detailed testing, as suggested by the Council, although there were some views that this was being done too early and all scenarios should be tested.
- 4.7 It was considered that the objectives to test the growth scenario were reasonable, many were cross cutting across the issues of concern such as infrastructure and no additional objectives were identified. It was also suggested that the growth scenarios needed more detailed evaluation and the current high level assessment using the traffic light system would change.

### **Employment Land**

- 4.8 There was a general feeling that stakeholders could not comment in detail on the employment land provision both in relation to historic and future allocations and requirements.
- 4.9 On the whole there was no disagreement with the Council suggestion to take forward 77ha of employment land in the replacement LDP. In relation to the surplus from the previous plan there was no definitive view

on whether previously allocated sites should be retained. It was felt that alternative uses could be considered if there was no employment need. A number of attendees felt consideration should be given to potential future loss of employment sites and industries, e.g. current and ongoing issues in relation to the steel industry.

- 4.10 The issue of the regeneration of Newport City Centre was raised and whether employment needs could be met with a regeneration of the city centre. This would include a new vision for the City Centre and the provision of alternative employment uses away from traditional industries. This could reflect changes in working patterns post COVID, with more home working and flexible work arrangements. It was noted by some that attempts to rejuvenate the city centre and had not succeeded previously. There was also an opinion that Newport's historical assets could be a catalyst to employment creation and regeneration of the city centre.

### **Spatial Options**

- 4.11 There were concerns with regard to the village approach and whether this option would be sustainable e.g. create more traffic and whether villages had enough services. There was a view that villages may be able to accommodate some smaller scale development and also consideration given to reviewing the current settlement boundaries.
- 4.12 There was no opposition to the other options. The hybrid approach was generally considered the most appropriate by the majority although a PDL option also had significant support. There was discussion at all events in relation to greenfield and brownfield sites. It was noted that the Council had historically been successful in promoting development in brownfield sites, although it would be difficult to achieve this in the new plan period. Overall many considered that brownfield sites should still be the focus, including using vacant buildings in town centres. Alternative views also pointed out that the cost of developing brownfield sites is greater, e.g. land remediation etc, and as such can have a knock on effect on the provision of affordable housing due to scheme viability. In addition, it was emphasised that brownfield sites can provide important biodiversity habitats and appropriate greenfield development may be a better option in some cases.
- 4.13 As with the growth scenarios it was considered the testing would need to be more detailed as compared to the current traffic light conclusion. In particular with regard to environmental and climate change issues.
- 4.14 No alternative options were put forward, although one or two people asked whether a no growth option had been considered, and there was also a suggestion of a possible new settlement to meet all the growth needs.

## **Other comments**

- 4.15 In relation to all the above matters attendees made the following general comments which they considered relevant to the consideration of each matter. It was felt that the area had a low skilled economy and there was a need to upskill workers and enhance opportunities. A range of industries were needed for a range of people with different skills.
- 4.16 It was pointed out that 70% of the Council area was rural. Agricultural policy is changing for example with matters such as, rewilding, food security, etc. It was also suggested that there was scope for small scale employment uses within these areas and also linked development opportunities in the rural communities as contributing to making such communities more sustainable.
- 4.17 Queries were raised in relation to the housing need. Another common comment related to the potential for towns and villages within the Council area to become dormitory settlements, i.e. settlements where there are little or no services, commercial or employment opportunities and where people would then travel elsewhere to meet these needs, in particular Cardiff and Bristol. The suggestion being that the housing requirement in Newport is being driven by the needs of other areas. Where new housing led to more commuting this would also have a knock on effect on traffic issues and congestion.
- 4.18 One issue that was raised consistently at all events was with regard to infrastructure. There was a feeling that new development was coming forward without the necessary infrastructure to support it. In particular concerns were raised regarding road and transport infrastructure. A number of attendees felt the road system and capacity across the Council area was not sufficient to accommodate new developments. A common view was that development was coming forward which increased congestion and highway issues and these matters were not being adequately addressed through the planning process.
- 4.19 At the same time, it was acknowledged by some attendees that planning policy did look to reduce the use of cars in new development, however, at the same time concerns were raised that public transport was insufficient to replace the use of cars. Therefore, new development would always generate car movements. Respondents' comments suggested that the availability and accessibility of public transport did vary across the area and between towns and smaller communities. One issue that was highlighted by many was the locational relationship between the railway station and the bus station and that there was no public transport interchange between the two. There was a view that there needs to be a better link between the two so you can arrive from a train and catch a bus without the need to walk somewhere else.
- 4.20 A particular issue that was raised in relation to transport was the M4 motorway which a number of respondents said often suffered from serious congestion, including tailbacks along the slip road and back

onto the side roads leading into Newport. Any new development which would lead to use of this junction would worsen the situation.

As part of each event discussions took place at regular points and attendees were asked to identify and list issues which they felt currently existed and could be addressed within the Replacement LDP. A list of the issues raised by the attendees are detailed below, under the heading of each event.

### 14 February 2023      Online

#### Growth scenarios

- The strategy appears to focus on the constraints relating to house completion rates and population prediction. It is considered that there are other constraints that need to be considered such as environmental constraints. There are a lot more constraints that need to be considered in relation to the strategy than just housing and population.
- Easier to build houses than create jobs. Houses for Bristol to encourage commuting. Protection of the Gwent Levels / constraints on the Plan. These constraints don't seem to be considered.
- Other constraints: transport is a particular problem. Problems on the M4 – this will get worse depending on where people work i.e. living in Newport and working in Bristol. Current housing figures would mean the local traffic and infrastructure issue would not cope.
- There needs to be focus or thinking on the availability and suitability of public transport e.g. new railway stations, some in the pipeline but no commitment as yet, or a railway station in Caerleon would serve a large population.
- At 3pm every day there is congestion on the M4 between Magor and Brynglas. Traffic then runs onto the surrounding roads. Any big development should be addressed in the east before the west as the reverse would cause more traffic issues. Lack of relief road contributes to this.
- Newport is at sea level and there are issues of flooding. Drainage, including sewerage is an issue.
- Llanvaches sewers at capacity since 1985 and subject to routine storm water flooding. Also, in the planned overflow of Wentwood reservoir. A48 and St Brides have major flooding constraints. Infrastructure is required before more building.
- Understand a lot of development may be coming towards Langstone.
- In relation to the Amazon building near Llanwern jobs are coming and will grow. Newport Town Centre has digressed as others have grown. An outlet village near Llanwern could create more jobs. Not all about housing need to bring people to Newport many will bypass Newport and go to Cardiff or Swansea. Need a development like Cribbs Causeway in Newport. It can be quicker to get there as it would form east to west Newport.
- No shortage of jobs it's the jobs that are available. Need to upskill the whole area in relation to skills, opportunities and training. This would be a priority over number of jobs need better skilled better paid.

- If land is earmarked for jobs growth it will only be needed when major start-ups arrive. Very unlikely given 6000 jobs in LG dissolved over time.
- No basis for employment land expansion and must be sited where it would not complicate the infrastructure issues.
- Tourism needs to be improved and jobs are underdeveloped around Newport. New museum may bring some employment and increase attraction to come to Newport.
- Also, the medieval ship and roman remains at Caerleon, these are unique resources. Development of tourism links into other issues such as transport.
- There are long term issues which need longer term plans and education. The vulnerability to flooding lot of land not high above sea level, these could be subject to sea invasion, large areas of Newport at risk. This should be tackled before the catastrophe happens. There needs to be a 50 year horizon to identify the risks and what is needed. We seem to be starting at the wrong end of the telescope.
- Sustainability of outlet villages, development should need to reduce commuting and not encourage.
- Rather than meet housing needs for people working in Bristol rather encourage this employment opportunities to come to Newport.
- Newport is the Gateway to Wales but the M4 is an issue Newport is an ideal location to travel elsewhere such as Midlands, SW, London South Wales. The road and traffic needs to be sorted out.
- Newport is a good place to live but needs jobs, needs homes and needs tourism. Road system needs to improve this.
- Climate Change is a priority and should be top of the list.

#### Employment Land

- B uses should be high value and not warehouses as these are sparing on employment.
- Employment land need for power supply, how much power will be needed, need for renewable energy sources.
- Role for solar panels big development near Bishton wetland. They need to be south facing and away from people.
- Solar panels depend on scale Bishton site may be an issue.
- New housebuilding standards are needed including better retrofit.
- Solar panels on roofs of larger building such as warehouses.
- Mini Hydro schemes we have a mega water flow down to the sea.

#### Spatial Options

- The issues are more complex than initially appears e.g. villages expensive due to infrastructure needs. Urban expansion has less of a cost.

- Expand the bigger villages though recognise constraints e.g. Langstone has quadrupled due to hotels in locality, but it lacks a school of any size. If Langstone grows it needs the infrastructure first and community facilities.
- Good idea to expand villages and put in the infrastructure rather than create new villages. Need more of an organic growth, villages have expanded over time.
- If development pushed out to the edges of Newport the more acute problems become and has greater and adverse impact on the environment. Depends which way we come at it. Problems are becoming so acute such as transport, air quality etc these need to play a part in deciding what is needed.
- Decline of the city centre – there is potential in the city centre but the impact of development in the outskirts of the city makes the city centre problems worse.
- A vital part of the plan should be what is going to happen to the city centre. There is a lot of interest but it is lacking direction. The Plan should identify how do you revitalise the city centre, many attempts have failed. We may be concentrating on the wrong things.
- Impacts of any expansions of development in Monmouthshire and how this may impact Newport.
- Hybrid solution may be best.
- Villages equals commuting.
- Every Village has major infrastructure issues. Sewers, lane maintenance, flooding access.
- Climate change should be a leading criterion and for most of Newport it should be red..red..red.
- Village focus should be red and therefore hybrid would not work.
- Must develop better cycle paths throughout Newport.
- Meet housing requirement adjacent to urban areas.
- The Spatial Options choice depends on what strategy we are trying to resolve what are the underlying issues that arise out of each option.
- Newport has tried to redevelop and there has been no success. People go to retail parks at Spyty Road and Maesglas. Towns grow outwards. Spending on the centre will not necessarily work, out of town development offers free parking making it easier. Not convinced putting more money into city centre would be a good idea.
- Role of tourism to spatial options and the need to redevelop the town centre. Use tourism as a catalyst. Tourism can be a major attraction e.g. St Fagans but this can have major transport implications.
- Need to protect good agricultural land although poor quality agricultural land can be good for biodiversity.

#### Other Comments

- Will there be a response/ document produced to show how any comments raised in the consultation have been considered and taken forward or not.
- Candidate sites other LAs dealt with it differently. Failure to identify candidate sites detracts from the openness of the process.



- Is the detail available to show where the proposed development areas are?
- Communication of candidate sites... why not now. Llanvaches at capacity on sewers eleven new houses built. We were not able to mobilise opinion and Welsh Water did not object. A lot of people are very suspicious that the details of the candidate sites have not been released. Consulting is in the dark until candidate sites are communicated.

**16 February 2023      Rhiwderin Community Hall**

**Growth Scenarios**

- Before considering a scenario to provide more houses there are currently houses that are empty. These should be factored into any housing need and ways found to bring these empty properties into use.
- There is a need provide and improve the infrastructure before providing more land for employment and jobs.
- The provision of extra jobs and extra houses.
- Where are Newport CC with regard to provision of windfall sites to provide additional housing.
- There is a need for additional facilities e.g. health centres.
- There is already a strain on transport infrastructure e.g. Brynglas and congestion.
- There is a need to assess existing infrastructure and facilities before more development is proposed. There are problems now e.g. school numbers.
- There are existing school issues and these have a knock on effect to cause traffic issues – gridlock.
- Future growth needs to involve joined up think of all issues and constraints.
- There should no new LDP until all other issues are resolved.
- Development on neighbouring authorities has an impact on Newport area are these being taken into consideration.
- Is the statistical data used for the growth scenarios sufficiently robust to make any judgements on growth scenarios.
- Flooding is an issue in Rhiwderin including surface water, previous approved developments have been an issue in this regard, would new development make this worse.
- When considering housing growth there is a need to consider house sales in the area.
- No land, no housing, no Growth.
- In relation to an analysis of the objectives against each potential growth scenario transport should be red

**Employment Land**

- Previously employment land has been lost to housing development.
- Infrastructure is an issue on any land coming forward for development.
- In relation to additional employment land there is currently sufficient empty industrial estates,

- Brownfield development leads to a loss of employment land.
- Town extension into Docks area would allow for new infrastructure. A strategic urban extension into the Docks area.
- There is a need to consider any impact upon the green belt.
- Flood defence is an important consideration in relation to any new development.
- There have been implications from the bypass for Rhiwderin.

#### Spatial Options

- Pollution issues need to be considered including air quality. This is currently an issue and should not be made worse.
- Mixed views on spatial options some think PDL, some support for village option.
- PDL development loses jobs.
- Newport Centre could be a possible focus for development but this has been tried before and has not worked.
- Loss of the Royal Gwent Hospital has been an issue and should be considered in relation to new development.
- Is a new settlement a possible idea? similar to in England. This would allow all new development and infrastructure to be planned and provided.

### **21 February 2023      Caerleon Town Hall**

#### Growth Scenarios

- Review of settlement boundaries needed particularly where a settlement can meet relevant tests of providing services, etc.
- Reopening railway and Caerleon Station would be a positive issue.
- There is a major impact on Newport due to the draw of Bristol, people in east Newport are living and working elsewhere.
- What has the current growth strategy achieved in relation to local economy, facilities, environment and infrastructure. AMR has not addressed this point.
- There is social segregation of rich and poor areas. There are now more deprived areas than before.
- Could we have done better with current growth?
- If you are going to grow, you should not take away vital services.
- The migration of communities leads to everyone go back and fro.
- Existing infrastructure needs assessment. When considering new development there is a need to understand schools are at capacity, GP practices are full etc.

- Air quality is currently an issue, one way system contributes to this, there is congestion in Caerleon and as a result Caerleon is polluted.
- No issues with growth scenarios are they really any different?
- Loss of bridge tolls has meant M4 traffic and associated problems is getting worse.
- Need to consider Caerleon as a unique location due to the Roman remains.
- The type of housing needs to be considered there is a clear shortage of affordable housing, the growth strategy needs to consider this issue.
- There is a need for the new LDP to provide balanced communities.
- Lorry traffic is an issue.
- The provision of adequate infrastructure is integral to any new development.
- If there is no plan growth will just happen, what we require is appropriate growth.
- Green belt does not appear to be considered in the current consultation.
- The plan needs to accommodate the implications of pollution and associated legislation.

#### Employment Land

- There is no shortage of employment land.
- Loss of employment land may be considered for other uses such as housing.
- There will be pressure on the remaining employment sites for future jobs use too.
- There needs to be an emphasis to attract investment for housing and employment together.
- Technology security of new development areas is a consideration e.g. no fly zone.

#### Spatial Options

- Previously NCC focussed growth on PDL, are we now running out of this type of land?
- Newport has been good at developing large brownfield sites due to the decline of the steel and aluminium industries. Best use has been made of such sites. Reclamation of such sites has been good.
- There is still plenty of brownfield sites in the Council area that could be used.
- Hi tech industries do not require large sites.
- Employment sites and housing sites can mix satisfactorily therefore reducing travel issues.
- Making best use of land could be a positive or a negative for the green belt.,
- There is a concern about the implications of a village development strategy in relation to impacts on wider area and sustainability.
- The footprint of the city centre is too large.
- Some development within villages is important to sustain and enhance communities and sustainability of such settlements.
- A new settlement would have wider negative impacts.

- Other areas such as Torfaen provide a commercial centre, new employment should consider the need for research and development.
- Majority of meeting supported PDL approach with hybrid option being the next appropriate. No support for Village or urban extension strategy.

#### Other Issues

- Candidate sites should be released before consideration of growth strategy.
- Why has this not been done, other authorities have released their candidate sites earlier.
- Implications of potential freeports.

### **Tuesday 21 February    Newport Centre**

#### Growth Scenarios

- The population is increasing therefore there is a need for more houses.
- What about the relationship to other strategies such as tourism e.g. NCC events, there is a need for things to do and Newport Heritage needs development so people will come. Planning can contribute to a change of image.
- There is a need for more employment and industry.
- City centre needs regeneration, out of town developments has caused issues.
- There is a lot of housing, but employment provision is not so good.
- The dwelling led approach will exacerbate the current problems.
- There is a need for a balance between housing and employment land.
- City centre economy needs to be boosted there are too many empty properties.
- What is meant by climate change?
- There is a conflict between all the objectives and these require a deeper thought.
- Educational resource should be included as a RLDP objective.

#### Employment Land

- There is a shortage of employment land, one business was looking for 4000sqft. Don't lose employment land provision.
- There is a need to redefine the town centre e.g. as an entertainment centre. Also to make better and more use of the heritage sites. This can be an economic catalyst for growth. There needs to be a new magnet to the town centre.
- There is a need for light industrial uses/ cottage industries and these should be encouraged in the LDP.
- In relation to housing in town centre better use should be made of living above shops.

- Re employment what will happen in 15 years, the steelworks could go anytime. What will be the impact of the loss of the steelworks?
- Agriculture is important. Keep agricultural land in agriculture, no loss of land. Encourage the use of agriculture as an employment resource. Land has been taken off for wetlands, however, SSSI should stay SSSI.

#### Spatial Options

- PDL is the better option, although a hybrid option is also a reasonable approach.
- Village development can be more difficult. More access for use of car are smaller villages sustainable,
- Infrastructure in villages is not good, making development difficult, including the absence of sewers and mains drainage.
- No need for a new town/settlement there is a town already here!
- The river area is an improvement and example of what the city can achieve going forward.
- The rail station in Newport is a problem. it is difficult to get there.
- Overall the feeling was the most appropriate options was PDL or hybrid strategy.

#### Other Issues

- There is a need to encourage people to use public transport, make it available, welcoming, regular and cost effective.
- Infrastructure issues. Roads are a big issue including surrounding roads and M5/M4 interchange. However, routes into Newport not too bad and it is close to other cities, gateway to Cardiff. The development of the Metro will be a positive. There is a need to promote active travel options. Finally, the 50mph is not effective.

**22 February 2023      Ringland Centre**

#### Growth Scenario

- Newport is the Gateway to South Wales.
- Cheaper housing stock is being taken up by commuters to Bristol.
- Interpretation e.g. Penhow is impacted by developments in Monmouthshire, is it part of Newport?
- Plan can be too city focussed.
- Need liaison with neighbouring authorities in relation to development and planning.
- Are the council assuming Llanwern will go, if so, there needs to be a contingency plan.
- Penhow does have some small sites around the village, but there is a plenty of brownfield land in Newport.
- Infrastructure is an issue the road system is not fit for purpose e.g. A48 and M4. Infrastructure has to be reviewed before development.
- Public transport including rail links to road system is not good.

- Building on farmland is a concern, this land is needed for agriculture.
- Objectives for testing the growth scenarios should include Welsh Language and education.

#### Employment Land

- Until infrastructure is sorted it is not considered that firms will want to come to Newport.
- Provision of land does not automatically equal number of jobs, a large land take may only employ a couple of people and vice versa, depending on the business.
- There needs to be a variety of businesses catered for with a variety of job opportunities. Historically the steelworks attracted specific trades but there needs to be greater variety going forward.

#### Spatial Options

- Newport City Centre needs change to encourage more use. No need for any further out of town developments. Friars walk provides niche shops but is not considered to have been successful.
- Penhow has no services to support development. No transport links, schools and would lead to unsustainable development. It is wishful thinking to develop such areas to make them sustainable.
- Villages should accommodate for people who move but want to move back to their original community.
- The docks are at capacity – urban expansion is it viable?
- PDL cannot be the only answer, Llanwern is the only one going forward.
- Villages have brownfield land but there is no settlement boundary to allow development at present. This needs to be reviewed and settlement boundaries reinstated. A few houses here and there would be acceptable but not disproportionate housing estates. Village infrastructure is directing these developments.
- Air quality is an issue which should be considered when looking at where to develop.

### **22 February 2023      Pill Millennium Centre**

#### Growth Scenario

- Infrastructure issues, roads, schools, hospitals, and commuters. Bristol provides demand for housing.
- How much influence will the Future Generations Commission have on the plan?
- There is a need to discourage the car but there needs to be an alternative mode of transport.
- Development will be to the east of Newport.
- Housing development will happen anyway.
- City centre needs regeneration at the moment there is no reason to go there.
- Loss of Admiral had a big impact on jobs. Also loss of Llanwern and The Passport Office. There is a need to attract ore employment to Newport.
- Objectives of growth are cross cutting where does provision of public space fit into this.

## Employment Land

- Re employment there is a need for large buildings somewhere
- Why would you reallocate employment land if there is a need.

## Spatial Options

- Villages can take development this should be sufficient to support facilities. They are not no go areas.
- Hybrid is a good way forward. Need a balanced approach.
- Do not expand into gaps as there is still a need for green spaces.
- Future policies important in relation to such issues as space standards and the health impact of housing

**23 February 2023**      **Online**

## Growth Scenario

- Spatial development of the options rather than the particular growth options. Key issues as a transport operator are where housing is and can it connect to transport services.
- Growth Scenarios broadly cover the realistic options.
- NRW more input at preferred strategy. Offsetting the effects of growth on environment. Few of the growth scenarios favour natural environment and biodiversity and conservation.
- How will any of the growth scenarios translate into the provision of affordable housing, with the broadest sense of affordable housing – probably need 25/30% housing provision being affordable. There is a dash to smaller properties and therefore implications on density.
- Torfaen is looking at a higher growth scenario, Newport is recognised as growth area in Future Wales. Need to see growth form current allocations to what can be accommodated.
- How much will the LDP take account of neighbouring LPAs plans given the need for regional growth. how do these affect Newport CC growth strategy. There will be regional growth.
- Infrastructure and roads are an issue including serving and delivering employment land. Roads review will have an impact on such matters.
- Overall no strong feeling on scenarios.
- GWR interest will be greater once plan progresses and sites come forward. Key issues will be movement of people to and from sites. In relation to reopening stations generally GWR would support. Encourage a modal shift.

## Employment Land

- Servicing and delivery of employment land M4 decision and roads review, who will build these sites and how will they be delivered. Getting service sites together is an issue.
- Transport and movement a better expression than infrastructure on this matter. High footfall sites should be located where train providers can serve them easily without massive financial input. Therefore, need to be attractive to users in relation to transport and in past some sites may not have achieved this.
- GWR interest will be greater once plan progresses and sites come forward. Key issues will be movement of people to and from sites. In relation to reopening stations generally GWR supported the principle elsewhere in UK. Encourage a modal shift.
- In relation to employment site particularly power supply is an important consideration, role of renewable energy and electric vehicles. Needs to be liaison with the likes of national grid so any sites can be delivered and meet climate change objectives.

### Spatial Options

- The hybrid approach would be most appropriate e.g. Urban extension and urban development and villages. One scenario on its own would bring too much pressure on just one settlement.
- Villages could take some share of the development needs. Must be considered on a settlement to settlement basis looking at all considerations, some could take more than others. Each location should be looked at to see if it passes relevant tests but not isolated locations.
- Take account of the new railway station in Cardiff could bring options e.g. Marshfield could be a suitable location for development.
- Consider 15 minute communities having regard to the comment above on villages. From an affordable housing point needs to be serviced well and not isolated.
- PDL is best option to minimise the loss of greenfield land, not just putting development in the areas there is knock on services e.g. groundworks such as sewers.
- Protection of the Severn Estuary to south issues such as emissions will have a knock on effect. These impacts must be minimised. (NRW).
- PDL is the main option but there will need to be a release of some greenfield sites.
- Brownfield sites the big issue is viability such as contamination and remediation issues, particularly for housing. Most of the easier sites have been developed leaving the more difficult ones to address. Qualitative discussion but will have implications on sites coming forward.
- Consideration of the Placemaking Charter which sets a new way of looking at things.
- GWR view development around sites that can be served by public transport, this is another option. Sites that are brownfield can be difficult to serve effectively.
- Urban expansion may not generate sufficient demand for public transport and therefore people default to other methods of transport.
- Deliverability will be an important issue on any of the spatial options.



- Brownfield sites can have biodiversity, but need to look at broader picture, likely to relate to particular sites.
- Is there sufficient PDL available can the supply meet the growth demand? Particularly with issues such as flooding and public transport/active travel.
- Villages may be able to bring any forward sites but deliverability and viability could be an issue in order to provide adequate services and infrastructure.
- Villages can provide some sites to make them sustainable, scale will be the key issue. However, major consideration will be drainage.
- Objectives an important part will be deliverability, not an objective run through the process.
- Placemaking is more intrinsic to the plan as a whole and not just an objective in its own right.

#### Other issues

- Role of community led housing as part of the affordable housing contribution.
- Lack of communication between Councils in relation to Cardiff Parkway station and its implications.
- Need joint working with partners e.g. National Grid where they have plans and not make decisions in isolation.
- The other Burns Report stations, within the LDP area, are important considerations in the preparation of the LDP. GWR happy to discuss in detail with LDP team.

#### **24 February 2023      Newport Youth Council**

- PDL should be looked at first, Newport industrial heritage means there should be a lot of such land.
- Need better quality developments.
- A new use and vision for the city centre. There is the skate park but there needs to be more things to do. In the city centre.
- There is a need for more houses, in particular social housing.
- Consideration to a 15 minute city.
- Poverty in Newport is a major issue.
- Design is important more green buildings and carbon zero.
- Growth is needed in Newport and more jobs are needed.
- It is desirable to provide a city where people want to stay.
- Need for planning to provide a prosperous and sustainable city and county where “I want to live in the future”. At the moment young people just want to move away when they can.

#### **28 February 2023      Online**

#### Growth Scenario

- The demographics used in the assessment appear to be based on 2020 ONS data. Welsh Government have issued updates since this report. Therefore, it is felt that some of the information in the growth scenarios is out of date. Across Wales population growth predicted in previous LDPS in Wales not come to pass and most LPAS have had to scale down their LDPs in light of the new Welsh Government data since 2020. These updated figures should be factored into consideration before a decision is made.
- The approach to discard some of the initial growth scenarios is not appropriate which is a claim based on Policy 33 Future Wales 2040. If this is an options based approach to consider the growth scenario, it is not considered to be growth options consultation if some options already discarded.
- Accept Policy 33 of Future Wales promotes sustainable long term growth but Policy 9 of Future Wales recognises the importance of national natural resource management areas and the sustainable management of such areas. The Gwent Levels is specifically mentioned as a key strategic resource and is one of only 6 national areas. Therefore, there is a caveat against the underpinning that the current document provides long term growth is in conformity with Future Wales 2040.
- One other option that does not find favour is a continuation of the current LDP growth strategy. This was an aggressive growth scenario itself and the current potential growth suggested will be higher than this.
- NCC have followed prescribed scenarios from WG and some are not feasible and hence discarded. Newport is a sustainable location, while development in the whole county outside the city in the countryside/villages is not sustainable.
- The level of the Welsh Government growth needs, as an identified growth area needs to be on the higher scale, if NCC go lower there will be a potential issue. Therefore, need to look at one of the higher scenarios.
- Favourite is option 2 with the wider economic benefits and reduce commuting. Difficult to make a decision as there is a limited amount of information/ context to do so.
- Newport should not discard options before an option stage. The latest estimates were out in chat.
- Table 3 is too high a level of assessment, there is no value in it, what is this assessment indicative of, need a more in depth way of looking at this matter. Does not assist in supporting a scenario. Would rather wait for when there is a more detailed integrated sustainability strategy to assess. Therefore, difficult to visualise the development related to the growth scenarios.
- No references to average dwelling per hectare, nothing there to show housing land requirements. Have this figure for employment but not housing.
- Support NCC in relation to description of the Gwent Levels as a significant constraint. Newport has a strange spatial pattern with a hugely important site to south and south west of the city and then Wales's largest brownfield site to the east. It is therefore hard to see where growth could be located at its most sustainable location. Also support reference to Green Belt significance. Given the significant constraints it is hard to see where the growth could go.
- No mention of renewable energy generation in the document. This is major land use and employment type and is becoming more and more important. Would ask that this should be looked at on the options.

- There is more up to date ONS census data available than in the current consultation.
- Other factors that have impacted Newport include the removal of tolls on the bridge and thereby increasing house prices. There are a number of external factors and therefore the parameters on the figures need to be expanded.
- Don't understand how the traffic light system assists. Climate change how would this be affected by development or how this issue affects the development.
- The current information is too broad brush it forces people down the road of what is most important. There is a need for more detail and there needs to be a balance and comparison of these matters.
- See as a simple visual aid not a detailed assessment.
- Whilst the above point is accepted it tends to force you along the road of what is most important to me and in reality, it needs to be more complicated.

## Employment

- Two sites to be retained in option 2 are in or on edge of the Gwent Levels there would be possible objections to these if they affect the SSSI.
- Not possible to roll sites forward, the Planning Act does not allow this. They should be part of the possible allocations of the new plan Sites should not be rolled forward but should be reassessed and reallocated based on current planning policies.
- Need to allow for climate change and new technologies that come forward. The traditional industries of Newport are going to need to change. Different sites may come forward in the years ahead as they change and adapt to climate change etc. We don't know what this will look like so need to keep as much employment land as possible. Agree with protecting the Gwent Levels this should not be needed given the potential land available.
- There needs to be clarification in relation to the 77Ha and 35 Ha surplus.
- It is impossible to know if 77Ha will be appropriate for the reasons outlined above. The 77 Ha does this include the Celtic Springs Land or would this be additional.
- Brownfield land has potential for substantial biodiversity value.
- Spatial options, pepper potting development won't work due to transport issues.
- There is a need to develop sustainable communities – elevated density of housing and co-location of facilities and employment within the existing settlement boundaries. More concentrated spatial strategy, - multi modal transport.
- Possibly not all brownfield sites are suitable and therefore a mixed strategy is required.
- Needs to follow the Welsh Government "Building Better Places" agenda, advocating mixed uses in town centres. Getting the balance right will be more difficult. This would support a PDL approach. At same time provide a positive way forward with a lively city centre.
- Trying to make villages sustainable, the old UDP, early 2000s, tried this and it did not work.

- Hybrid approach would seem the most appropriate, you cannot do one or the other there needs to be a balance between the different locations and the availability of sites. Need the candidate sites to assess the spatial option to see if it possible to fulfil the strategy needs.

### **7 March 2023 NCC Community Councils Group**

- Marshfield appears to be identified as an area of growth – there are no amenities, only one shop, no GP, no public transport, etc, there is green belt to the west. The impact of new railway station on Marshfield. *(Explained the current consultation was not identifying specific sites at this stage. Response was that city councillors had said Marshfield will be developed).*
- There is an acute housing shortage. Therefore, a dwelling led scenario would be best to address the housing issues.
- There is a need for infrastructure and services not just housing.
- There are problem issues re roads and traffic.
- There can be flood issues in some places e.g. Langstone / Magor.
- Surface water is also an issue.
- Everywhere needs housing but when considering locations it is important to look at the bigger picture and other issues/constraints, need to be joined up decision.
- Climate change is an issue, Marshfield experiences flooding.
- Large developers should be advised to put land requirements forward.
- The growth in remote working is a consideration is there a need for large employment sites where there is a need for housing especially affordable housing. Reviewing existing site allocations should be considered.
- Development of brownfield land before greenfield land.
- Don't think there would be enough brownfield land to meet the growth required. Llanwern was the biggest brownfield site, probably land available for smaller developments such as around 20 dwellings but large scale brownfield land has been depleted.
- Overall the view of the attendees was that a hybrid approach would be most appropriate.



Planning Aid Wales  
Cymorth Cynllunio Cymru



## **NEWPORT REPLACEMENT LOCAL DEVELOPMENT PLAN: ENGAGEMENT ON GROWTH AND SPATIAL OPTIONS CONSULTATION**

Dear RLDP Consultee,

Newport City Council (the Council) will be consulting on the Growth and Spatial Options for the Replacement Local Development Plan between 25th January 2023 and 8th March 2023.

The Council is currently in the process of preparing a Replacement Local Development Plan (RLDP), the Growth and Spatial Options are the next key stage in this process. The RLDP will cover the period 2021 to 2036 and identify the scale and location of new development for Newport over this period. When this new Plan is adopted, it will replace the current LDP. It will also become the framework for development, investment and infrastructure, protect the environment and be the primary consideration for determining planning applications.

The Growth and Spatial Options consultation presents different housing and employment growth scenarios and spatial distribution options. The purpose of the housing and employment growth scenarios are to introduce the different scales of growth anticipated, based on different methods or assumptions, and seek feedback to inform what the preferred growth strategy for the RLDP should be. Different spatial options are presented to provide an indication of how growth could be distributed across Newport, albeit no specific locations have been assessed at this stage.

Planning Aid Wales (PAW) has been engaged to run consultation events for Communities and Stakeholders throughout Newport during the consultation period. These events will provide more information on the RLDP process, the implications of the Growth and Spatial Options and how you can comment on the content of the Plan.

PAW is a registered charity that supports community engagement in planning in Wales. We have extensive experience of helping communities understand and have their say in the planning system. PAW recognises LDP preparation is an important avenue for securing more effective public involvement in planning.

At the events, PAW will be independent and impartial and will seek to encourage you to put forward your opinions. We will capture this information and report it back to the Council.

The schedule of planned events during the consultation period are set out below. All workshops will cover the same content and have the same format, so please register for whichever event best suits your needs and availability. To register for an event, visit the link that accompanies that event's details.

### Face to Face Events

- 16 February 2023 6.30pm – 8.30pm: **Rhiwderin Community Centre**, 5 Pentre Tai Rd, Rhiwderin, Newport, NP10 8RX  
Register for this event: <https://www.eventbrite.co.uk/e/newport-city-council-replacement-ldp-growth-spatial-options-consultation-registration-517368622477?aff=ebdsoporgprofile>
- 21 February 2023 2.15pm – 4.15pm: **Caerleon Town Hall**, Church Street, Caerleon, NP18 1AW  
Register for this event: <https://www.eventbrite.co.uk/e/newport-city-council-replacement-ldp-growth-spatial-options-consultation-registration-517410848777?aff=ebdsoporgprofile>
- 22 February 2023 2.15pm – 4.15pm: **Ringland Community Centre**, 282 Ringland Circle, Newport, NP19 9PS  
Register for this event: <https://www.eventbrite.co.uk/e/newport-city-council-replacement-ldp-growth-spatial-options-consultation-registration-517418682207?aff=ebdsoporgprofile>
- 22 February 2023 6.00pm – 8.00pm: **Pill Millennium Centre**, Courtybella Terrace Pill, Newport, NP20 2GH  
Register for this event: <https://www.eventbrite.co.uk/e/newport-city-council-replacement-ldp-growth-spatial-options-consultation-registration-517445943747?aff=ebdsoporgprofile>

#### Online Events

- Tuesday 14th February 2023 10.30am - 12.30pm
- Thursday 23rd February 2023 2.00pm – 4.00pm
- Tuesday 28th February 2023 6.30pm - 8.30pm

Register for one of these events: <https://www.eventbrite.co.uk/e/newport-city-council-replacement-ldp-growth-spatial-options-consultation-registration-517319997037?aff=ebdsoporgprofile>

Please indicate whether you require Welsh translation for the event when you register.

If you require further assistance, please contact Mark Jones from Planning Aid Wales on 02921 660 904 or by emailing [mark@planningaidwales.org.uk](mailto:mark@planningaidwales.org.uk). For further information on the RLDP and the current consultation please visit our consultation website <https://newportrldp.co.uk/> or the Council website [www.newport.gov.uk/rldp](http://www.newport.gov.uk/rldp).

Yours faithfully,

Mark Jones  
Planning Engagement Officer  
Planning Aid Wales

## **CYNLLUN DATBLYGU LLEOL CASNEWYDD: YMGYSYLLTU AR YMGYNGHORIAD OPSIYNAU TWF A GOFODOL**

Annwyl Ymgynghorai'r CDLIN,

Bydd Cyngor Dinas Casnewydd (y Cyngor) yn ymgynghori ar yr Opsiynau Twf a Gofodol ar gyfer y Cynllun Datblygu Lleol newydd (CDLIN) rhwng 25 Ionawr 2023 a 8 Mawrth 2023.

Ar hyn o bryd mae'r Cyngor yn y broses o baratoi CDLIN, yr Opsiynau Twf a Gofodol yw'r cam allweddol nesaf yn y broses hon. Bydd y CDLIN yn cwmpasu'r cyfnod rhwng 2021 a 2036 ac yn nodi graddfa a lleoliad datblygiad newydd i Gasnewydd dros y cyfnod hwn. Pan gaiff y Cynllun newydd hwn ei fabwysiadu, bydd yn disodli'r CDLI presennol. Bydd hefyd yn dod yn fframwaith ar gyfer datblygu, buddsoddi a seilwaith, amddiffyn yr amgylchedd a bod yn brif ystyriaeth ar gyfer penderfynu ar geisiadau cynllunio.

Mae'r ymgynghoriad Opsiynau Twf a Gofodol yn cyflwyno gwahanol senarios twf tai a chyflogaeth ac opsiynau dosbarthu gofodol. Diben y senarios twf tai a chyflogaeth yw cyflwyno'r gwahanol raddfeydd o dwf a ragwelir, yn seiliedig ar wahanol ddulliau neu ragdybiaethau, a cheisio adborth i lywio'r hyn y dylai'r strategaeth dwf a ffefrir ar gyfer y CDLIN fod. Cyflwynir gwahanol opsiynau gofodol i roi syniad o sut y gellid dosbarthu twf ledled Casnewydd, er nad oes unrhyw leoliadau penodol wedi cael eu hasesu ar hyn o bryd.

Mae Cymorth Cynllunio Cymru (CCC) wedi cael ei ymgysylltu i gynnal digwyddiadau ymgynghori ar gyfer Cymunedau a Rhanddeiliaid ledled Casnewydd yn ystod y cyfnod ymgynghori. Bydd y digwyddiadau hyn yn rhoi mwy o wybodaeth am broses y CDLIN, goblygiadau'r Opsiynau Twf a Gofodol a sut y gallwch roi sylwadau ar gynnwys y Cynllun.

Mae CCC yn elusen gofrestredig sy'n cefnogi cynnwys y gymuned mewn cynllunio yng Nghymru. Mae gennym brofiad helaeth o helpu cymunedau i ddeall y system gynllunio ac i ddweud eu dweud arni. Mae CCC yn cydnabod bod paratoi CDLI yn bwysig ar gyfer cynnwys y cyhoedd yn fwy effeithiol mewn cynllunio.

Yn y digwyddiadau, bydd CCC yn annibynnol ac yn ddiuedd a bydd yn ceisio eich annog i gyflwyno eich barn. Byddwn yn casglu'r wybodaeth hon ac yn ei hadrodd yn ôl i'r Cyngor.

Mae amserlen y digwyddiadau arfaethedig yn ystod y cyfnod ymgynghori wedi'i nodi isod. Bydd pob gweithdy yn trafod yr un cynnwys ac â'r un fformat, felly cofrestrwch ar gyfer pa bynnag ddigwyddiad sy'n addas i'ch anghenion a'ch argaeledd. I gofrestru ar gyfer digwyddiad, ewch i'r ddolen sy'n cyd-fynd â manylion y digwyddiad hwnnw.

[Digwyddiadau wyneb yn wyneb](#)

- 16 Chwefror 2023 6.30pm – 8.30pm: **Canolfan Gymunedol Rhiwderyn**, 5 Pentre Tai Rd, Rhiwderyn, Casnewydd, NP10 8RX  
Cofrestru ar gyfer y digwyddiad hwn: <https://www.eventbrite.co.uk/e/newport-city-council-replacement-ldp-growth-spatial-options-consultation-registration-517368622477?aff=ebdsoporgprofile>
- 21 Chwefror 2023 2.15pm – 4.15pm: **Neuadd y Dref Caerllion**, Church Street, Caerllion, NP18 1AW  
Cofrestru ar gyfer y digwyddiad hwn: <https://www.eventbrite.co.uk/e/newport-city-council-replacement-ldp-growth-spatial-options-consultation-registration-517410848777?aff=ebdsoporgprofile>
- 22 Chwefror 2023 2.15pm – 4.15pm: **Canolfan Gymunedol Ringland**, 282 Ringland Circle, Casnewydd, NP19 9PS  
Cofrestru ar gyfer y digwyddiad hwn: <https://www.eventbrite.co.uk/e/newport-city-council-replacement-ldp-growth-spatial-options-consultation-registration-517418682207?aff=ebdsoporgprofile>
- 22 Chwefror 2023 6.00pm – 8.00pm: **Canolfan y Mileniwm Pilgwenlli**, Courtybella Terrace, Pilgwenlli, Casnewydd, NP20 2GH  
Cofrestru ar gyfer y digwyddiad hwn: <https://www.eventbrite.co.uk/e/newport-city-council-replacement-ldp-growth-spatial-options-consultation-registration-517445943747?aff=ebdsoporgprofile>

#### Online Events

- Dydd Mawrth 14th Chwefror 2023 10.30am - 12.30pm
  - Dydd Iau 23rd Chwefror 2023 2.00pm – 4.00pm
  - Dydd Mawrth 28th Chwefror 2023 6.30pm - 8.30pm
- Cofrestru ar gyfer un o'r digwyddiadau hyn: <https://www.eventbrite.co.uk/e/newport-city-council-replacement-ldp-growth-spatial-options-consultation-registration-517319997037?aff=ebdsoporgprofile>

Nodwch a oes angen cyfieithiad Cymraeg arnoch ar gyfer y digwyddiad wrth gofrestru.

Os oes angen mwy o gymorth arnoch, cysylltwch â Mark Jones o CCC ar 02921 660 904 neu drwy anfon e-bost at [mark@planningaidwales.org.uk](mailto:mark@planningaidwales.org.uk). I gael mwy o wybodaeth am y CDLIN a'r ymgynghoriad presennol ewch i'n gwefan ymgynghori [yma](http://yma) neu wefan y Cyngor [yma](http://yma).

Yn gywir ,

Mark Jones  
Smwyddog Ymgysylltiad Cynllunio  
Cymorth Cynllunio Cymru



### Appendix 3 Other Information submitted to the events.

The following emails were received after two of the events from attendees:

- Email dated 14 February 2023

“This year's flooding has been the worst to date with no contribution from the Wentwood reservoir overflow.

See Flooding in Llanvaches on YouTube.

Latest TAN maps have at long last recorded the issues.

Serious A 48 flooding is also influenced by overflow from the Penhow Quarry lakes.”

This email also include a PowerPoint presentation of NCC RLDP meeting with LCC 28 June 2022

- Email received 26 February 2023

“Thank you Mark for the presentation, on Wednesday afternoon, and hope your evening event went well. It was surprising to see so few residents in attendance. I’m writing this as a resident, and not on behalf of Penhow Community Council.

I’d like to raise some points that I made during the presentation by firstly asking a question.

City or Village?

I find it difficult to determine, from Newport’s written and online outputs such as publications, documents, newsletters and leaflets, just where Penhow sits, or is regarded, in the framework of ‘Newport’. ‘Newport’ doesn’t readily acknowledge its County role in its texts. The maps show Parc Seymour as an urban Inset 7. However we’re in the Village option map. Penhow is not just Parc Seymour, and Penhow isn’t mentioned. I see ‘Newport’ as Newport City and County Council.

Communication.

As a comment on the Consultation approach, I find it clear and easily understood, but narrow in its reach, and not transparent when it needs to be. In private industry, such a consultation, where comment is requested before any practical discursive information is available, would have no chance of a successful outcome for anyone. The timing of the next opportunity to attend a consultation meeting must come after we have the candidate list, and before the Preferred strategy is defined.

We have noticeboards that inform residents of and can only show a certain amount of information. Residents’ awareness and information sources on the LDP or RLDP will be mainly through online routes of communication,

with no supporting leafleting to direct residents when key topics arise and where to look. The Press, local and National, continues to follow an opinion based editorial, on shock, alarmist or celebrity based topics, so front pages no longer lead on governance of the area often enough.

Just like the Newport Matters publication, Newsletters on the RLDP, are only available online. Articles in Newport Matters are mainly limited to Newport City, anyway, and information pertaining to the whole County is poor.

In a village of many new and long term retired residents, many of those won't have maintained their online connections if they ever had one, so I'd say out of all of the homes in Penhow we may have only a few residents reading anything regularly that 'Newport' publishes. In summary, the reach of information is very poor indeed. Families are increasingly finding homes in the village of Penhow. Their next job, their services, their education, their aspirations, depend on local information.

We have to stop thinking that children should be the route for communicating on adult sensitivities and sensibilities, using schools to get messages out. Schools are not the places to bring local, political or selective social messaging for discussion. Communication needs to be full, not partial and not depend on the eldest and youngest generations to find out and pass it on. It didn't look to me as if the Ringland Community attended in any numbers, and there were only 8 or 9 residents present from Langstone and Penhow.... And that's a key consultation affecting everyone, held in Ringland. That should ring alarm bells in any consultation process.

Transport.

We have an increasing problem with the A48. During the last bout of bad weather, our old, badly maintained drainage, couldn't cope in two places within a half mile, with flooding which contributed to several serious accidents over several days. Speed, car maintenance, and driver behaviour contributed to them, too.... although we can't say that without evidence, but we can all see it. We have narrow roads and problems with parking, we have 50mph speed signs 200 yards from a junction and outside a park, there are no traffic calming measures, no road markings. Narrow lanes used by residents are increasingly pot holed, unkempt, or blocked by delivery drivers. The traffic levels are changing, the driving behaviour is changing, the motorist is changing. 'Newport' put a drop kerb on a pavement in Parc Seymour, it took several days. residents of Newport City Homes Park in front of it most of the time. No one can see the point of the drop kerb. It wasn't what was needed, and nothing else changes.

The A48 has, in the main, a 40 or 50mph driving limit, rising to a 60mph limit in Monmouthshire's part. All residents know that means a lot of drivers will be moving at a speeds of up to 70mph and above, between the Coldra and Chepstow. Double white lines and hatched and coloured road surfaces on the A48 do not stop overtaking on it by drivers in a hurry at high speed, any more than a badly placed drop kerb makes crossing the road safer. We need a review, to look again at speed limits, pavements, paths, lanes, laybys, so that drivers and cyclists can pull out of side roads without harassment from drivers in a hurry, so that tractors can move safely, so that pedestrians can crossroads and negotiate lanes. This is before any growth or spatial options for the RLDP are considered.

We weren't considered for the fflecsi bus route, and even though it's now not available, how does that fit with an urban inset 7?

Signage.

When our village road signs fell into disrepair, we had to replace them via the Community Council from the precept. That's not something Newport City residents would accept. We cannot keep using the precept as a parish source of funding, if Newport City and County Council takes an urban view of what's needed.

Emergency Support. When we had travellers arrive, we had a very slow attendance time for representation from Newport City and County Council and again the huge effort and cost fell to the precept. The Police did nothing except make it impossible for residents to solve the problem on that day.

Criminality and Policing.

Speeding. Parking. Littering. Fly tipping.

We have no attention to any of it without incessant Report its efforts, online, to Newport City and County Council, and we are always on the back of our hard working City Councillors. We have been promised Police attention to the many off road bikes tearing through the village and the A48 on their back wheels, in excess of speed limits, making abusive gestures, so they can drive in the forest, churning it up, intimidating walkers and ruining ancient barrows. We're reduced to reporting the broken stiles, asking for Forest gates and repairs for potholes, lay-bys and banks in the lanes, as repeated piecemeal exercises rather than as part of what should be a Newport County willingness to provide routine support. I started a litter picking group, but stopped because I was pick up empty cocaine bags in the laybys on the A48. That's a policing and highways issue, if people are driving under the influence of drugs or alcohol.

Volunteers are self-supporting.

There is no amenity in Penhow that isn't run by volunteers, including our shops, Church and Chapel halls, social groups and Community Council. There are no surgeries, doctors, dentists, libraries and banks, and you'll rarely see anyone waiting in the bus stops on the A48. There is now no part time Post Office Service, and Newport needs to update its website for our postcode. Just take a look at the distances quoted for travel to services.

So, I wonder now what Newport City and County Council will do for the future for even our current infrastructure, let alone a changed one, if the RLDP outcome gives the preferred strategy as the Village option and is either business or population led. Penhow has constraints of geography, topography, amenity, natural environment and history, too.

In my short time as a Community Councillor, and relatively short time as a resident of a Penhow, I can't see Newport City and County Council assessing the viability of any new businesses and new home building effectively in Penhow, and it needs to take an immediate and serious look at what it's doing now.

New residents in Caldicot won't shop in Caldicot, it's failing rapidly. They won't like Newport City without good quality shopping, nor Chepstow for lack of parking and traffic levels, but they will maybe go to Spytty and that'll be via the A48, from which they'll soon find Newport's back roads into Cardiff. Accidents, winter weather conditions and summer traffic all impact on the A48, drivers want a quick route to work and a quicker one home.

I think change is inevitable, to support growing and changing populations, for a healthy Welsh economy. The pandemic has changed people's perceptions of themselves and expectations of others, there's no reset button. Businesses from outside Wales and from inside take up Welsh government grants but provide little long term growth. They renege on employment promises, take the funds, fail, start again.....and again....giving the Welsh economy few opportunities even to aspire to, let alone, see the community benefits of growth.

Time for a wakeup call, a bit of care, and a change of approach, before determining a growth strategy, but at least we are , as you said, in the process early, so can hopefully use a voice that has a chance to be heard, and hope for some effective listening to be done."