

Newport Local Development Plan Review Report

April 2021



Creu Lleoedd Cymru
Placemaking Wales

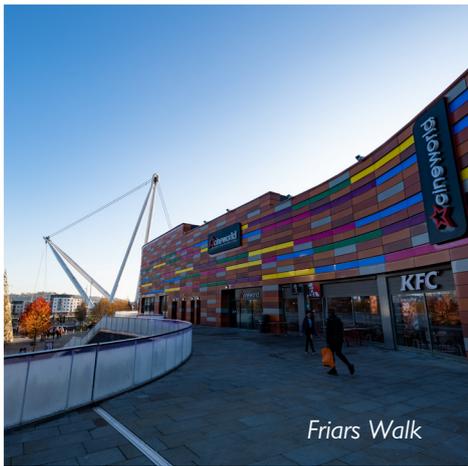
Llofnodydd y Starter Charter Signatory



NEWPORT
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Friars Walk



SDR bridge

I. Executive Summary

■ Purpose of the Review Report

- 1.1 Local Planning Authorities (LPA) have a requirement to keep their development plans up to date and consider the need for review either through their Annual Monitoring Report (AMR) or having reached 4 years post adoption of the Local Development Plan (LDP). The Newport AMR 2020 made a recommendation, and the Council has subsequently agreed, to begin the review and process of undertaking a replacement LDP.
- 1.2 Changes to an adopted LDP can only be made through formal plan revision. The first stage is to produce a Review Report (RR), which will be a key part of the evidence base underpinning the form and content of the revised plan and submitted to the Inspector for examination. There are two revision routes available to choose from when looking how to revise an LDP. Firstly there is a Full Revision of the plan following the same procedures as used in preparing the adopted plan, or secondly, the Short Form Revision procedure where the parameters to be considered are very much more focussed and limited in scope, as evidenced through the RR.
- 1.3 The importance of this Review Report to the LDP process means that it is essential that it is subject to consultation. This will ensure that it forms a thorough and robust approach to the creation of a Replacement LDP for Newport. Following consultation, the report will be updated reflecting the comments received setting out the potential implications for both

the content of the plan and the review process i.e. full plan revision or short form revision.

■ Consultation

- 1.4 The Council undertook consultation on the draft Delivery Agreement from January to 5 March 2021. Views were sought on the issues that should be considered in the full review of the LDP, together with the subsequent potential changes required to the LDP, as set out in Chapters 5 and 6 of this report.
- 1.5 Please note that if you or your organisation are not already registered to be involved, you can do this through the Council's website: www.newport.gov.uk/ldp, by email to ldp.consultation@newport.gov.uk, by telephoning 01633 656656 or by writing to: Planning Policy Team, Room 707, Newport City Council, Civic Centre, Newport, NP20 4UR.



2. Introduction

- 2.1 The Newport Local Development Plan (LDP) was adopted by the Council on 27 January 2015 and sets out the Council's planning framework for the development and use of land in Newport over the period 2011 – 2026. In accordance with statutory requirements, the LDP has been monitored on an annual basis with five Annual Monitoring Reports (AMR) published to date¹.
- 2.2 To ensure that LDPs are kept up-to-date, local planning authorities are required² to commence a review of their plans at least once every four years following plan adoption, or sooner if the findings of the AMRs indicate significant concerns with a plan's implementation. This Review Report (RR) sets out the finding of the review³, setting out the proposed extent of likely changes to the existing LDP and seeks to confirm the revision procedure to be followed in preparing a replacement LDP (RLDP).
- 2.3 The Review Report is structured as recommended in national guidance and contains the following sections:
- 2.4 Chapter 3 details the key legislative, national and local policy changes and evidence base that have occurred since the adoption of the LDP in 2015 which are important considerations to inform the review of the LDP.
- 2.5 Chapter 4 provides a summary of the main findings of the past five Annual Monitoring Reports (AMR), outlining the associated implications for review of the LDP.
- 2.6 Chapter 5 provides an assessment of the current LDP and sets out the potential changes in terms of the Vision and Objectives, Development Strategy and Policies to inform the review process.
- 2.7 Chapter 6 considers the areas of evidence base that would need to be reviewed/updated in preparing a RLDP.
- 2.8 Chapter 7 considers the potential options for review of the LDP and opportunities for collaboration.
- 2.9 Chapter 8 provides a conclusion on the appropriate form of plan revision and outlines the next steps.

¹Available to view at: <http://www.newport.gov.uk/en/Planning-Housing/Planning/Planning-policy/Local-Development-Plan/LDP-monitoring-reports.aspx>

²Town and Country Planning (LDP) (Wales) Regulations 2005, as amended: S.41

³Required under Section 69 of The Planning and Compulsory Purchase Act 2004

3. Informing the LDP Review

3.1. The Council must consider contextual changes since the adoption of the LDP. This includes changes to national, regional, and local policies, legislation and strategies that will have implications for the RLDP. The most significant of these changes are set out below.

■ Legislative Changes

Planning (Wales) Act 2015

- 3.2 The Planning (Wales) Act received Royal Assent in July 2015 and came into force in stages between October 2015 and January 2016. It sets out a series of legislative changes to deliver reform of the planning system in Wales, to ensure that it is fair, resilient and enables development. The Act addresses 5 key objectives which includes strengthening the plan-led approach to planning. The Act strengthens the plan led approach and introduces a legal basis for the preparation of a National Development Framework (NDF) and Strategic Development Plans (SDP).
- 3.3 It is a statutory requirement for Welsh Ministers to produce a National Development Framework. The NDF, renamed Future Wales: the National Plan 2040, will replace the Wales Spatial Plan and will set out land use priorities and a land use framework, concentrating at the nationally significant scale, for Strategic and Local Development Plans. The NDF has been laid in the Senedd and is undergoing a scrutiny period and is anticipated to be published in February 2021; how this impacts on Newport is set out below.
- 3.4 The key impact on Local Development Plans from the introduction of NDF and SDP is the need to consider a review of the LDP once the NDF and SDP are published or adopted to ensure all land use plans are consistent.

The Town and Country Planning (Local Development Plan) (Wales) (Amendment) Regulations 2015

- 3.5 Amendments to The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 were carried out in response to the outcome of the LDP refinement exercise and aims to simplify certain aspects of the LDP process. The amended Regulations remove the statutory requirement to advertise consultation stages in the local press; allowing local planning authorities to make revisions to the LDP where the issues involved are not of sufficient significance to warrant the full procedure, without going through the full revision process; eliminate the need to call for, and consult on, alternative sites following the deposit consultation; and make minor and consequential amendments.
- 3.6 The amended LDP Regulations came into force on 28 August 2015 and together with the related policy and guidance in Planning Policy Wales (PPW). Edition 10, and the revised LDP Manual (Edition 3), aim to make the LDP process more efficient and effective (i.e. enabling swifter plan preparation and revision without imposing unnecessary prescription). The amended Regulations will need to be considered in relation to any Plan review and will be given further consideration as necessary.

Well-being of Future Generations (Wales) Act 2015

3.7 The Act is about putting sustainable development at the heart of Government and public bodies. This is to be achieved by improving the social, economic, environmental and cultural well-being of Wales. The Act requires public bodies to consider the long-term, to work with people and communities and each other, look to prevent problems and take a more joined-up approach; through the application of seven well-being goals. Newport has produced its Local Well-being Plan as required which has replaced the Single Integrated Plan (SIP). This Act will require LDPs to consider the outcome of the Well-being Plan in the future rather than the SIP which is currently given regard. Sustainability is a core principle of the LDP and there will be clear links between the LDP and Well-being Plan.

Environment (Wales) Act 2016

3.8 The Environment (Wales) Act received Royal Assent in March 2016 and sits alongside both the Planning (Wales) Act 2015 and the Well-being of Future Generations (Wales) Act 2015 in promoting the sustainable use, management, and development of Welsh resources. The Environment (Wales) Act introduces new legislation for the environment and provides an iterative framework which ensures that managing Wales' natural resources sustainably will be a core consideration in decision-making. The Act also requires Welsh Government to produce a Natural Resources Policy that sets out the priorities, risks, and opportunities for managing Wales' natural resources sustainably, as detailed below.

Historic Environment (Wales) Act 2016

3.9 The Historic Environment (Wales) Act 2016 received Royal Assent in March 2016. The Act has three main aims: to give more effective protection to listed buildings and scheduled monuments; improve the sustainable management of the historic environment; and introduce greater transparency and accountability into decisions taken on the historic environment. The Act provides effective protection to listed buildings and

scheduled ancient monuments; it improves the sustainable management of the historic environment and introduces greater transparency and accountability into decisions taken on the historic environment. The Act will also form the core of an integrated suite of legislation, policy, advice and guidance which together will provide a flexible and effective system for the sustainable management of the Welsh historic environment, reflecting current conservation principles and practice. The LDP sets out locally specific policies and has not sought to repeat national policy and will ensure that any changes to conservation practice are reflected where necessary in a replacement plan.

Public Health (Wales) Act 2017

3.10 The Public Health (Wales) Act 2017 received Royal Assent in July 2017. The Act makes changes to the law in Wales to improve health and prevent avoidable health harms. Some of the relevant changes in the Act include the production of a national strategy on preventing and reducing obesity and a requirement to undertake Health Impact Assessment (HIA) on key decisions including Local Development Plans shall be undertaken part of the Sustainability Appraisal.



■ National Planning Policy/ Plans

National Development Framework

3.11 The Welsh Government has published Future Wales: the national plan 2040 (FW) which is the highest tier of development plan in Wales. FW, legally known as the National Development Framework (NDF), sets out the 20-year spatial framework for land use in Wales, providing a context for the provision of new infrastructure/growth. It will concentrate on development and land use issues of national significance which the planning system is able to influence and deliver. FW replaces the Wales Spatial Plan which was revoked on the 24th February 2021.

3.12 FW identifies Newport as a National Growth Area. The Policy notes that Welsh Government supports Newport as the focus for regional growth and investment and wants to see the City play an increased strategic role in the region. It goes on to state that Strategic and Local Development Plans across the region should recognise Newport as a focus for strategic housing and economic growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure; and consider how they can support and benefit from Newport's increased strategic regional role. 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. The inclusion of Newport as a Centre of National Growth is a significant boost for the city.

Welsh National Marine Plan

3.13 The Welsh National Marine Plan (WNMP) was adopted on 12 November 2019. It is the first marine plan for Welsh seas and covers the inshore and offshore marine plan areas for which Welsh Ministers are the marine planning authority. The WNMP sets out the Welsh Minister's policies for the sustainable development of Wales' seas. The Plan will help manage increasing demands for the use of our marine environment, encourage and support the economic development of

marine sectors at appropriate locations and incorporate environmental protection and social considerations into marine decision-making. Due to Newport's coastal location, the next version of the LDP will need to fully consider the adopted WNMP.

Planning Policy Wales (Edition 11) and Technical Advice Notes

3.14 Since the LDP was adopted in January 2016, Welsh Government have revised Planning Policy Wales four times; the current version is Edition 11 which was published in February 2021. PPW was redrafted so that the implications of the publication of Future Wales: the national plan 2040 is fully integrated into policy. This reiterates the concept and importance of placemaking into the heart of national planning policy in order to ensure that planning decisions consider all aspects of well-being and deliver new development which is sustainable and provides for the needs of all people

3.15 Since the adoption of the LDP, the following changes have been made to TAN and Mineral Technical Advice Notes (MTAN) in Wales:

- TAN 1: Joint Housing Land Availability Studies was revoked by WG in March 2020.
- TAN 4: Retail and Commercial Development was updated in November 2016.
- TAN 8: Planning for Renewable Energy was revoked by WG in February 2021.
- TAN 11: Noise. There was a call for evidence made in early 2020 to support the review of the TAN to include air quality and soundscape. Clean Air Plan for Wales - Healthy Air, Healthy Wales.
- TAN 12: Design was updated in March 2016.
- TAN 14: Coastal Planning was recently updated, and consultation responses are being reviewed.
- TAN 15: Development and Flood Risk consultation was recently updated, and consultation responses are being reviewed.
- TAN 20: Planning and the Welsh Language updated in October 2017.
- TAN 21: Waste updated in February 2017.
- TAN 24: The Historic Environment was produced in May 2017.
- Current work is being undertaken on reviewing intensive agriculture.

Local Development Plan Manual, Edition 3

3.16 The Development Plans Manual, Edition 3, was published on 26 March 2020. The Manual is a reference document for practitioners who are responsible for, or contribute to, the preparation and implementation of development plans. It contains practical guidance on how to prepare, monitor and revise a development plan, underpinned by robust evidence to ensure that plans are effective and deliverable and contribute to place-making, as defined in national policy set out in PPW. The Manual incorporates lessons learned to date, best practice in resolving issues and how to 'de-risk' plans through the preparation of a robust and focussed evidence base. The Manual clarifies the expectations of Welsh Government about the plan making process. This will be one of the key reference documents for the progression of a revised LDP.

Natural Resources Policy

3.17 In line with the Environment (Wales) Act 2015 the Welsh Government produced a Natural Resources Policy (NRP) in August 2017. The focus of the NRP is the sustainable management of Wales' natural resources, to maximise their contribution to achieving goals within the Well-being of Future Generations Act. The NRP sets out three National Priorities: delivering nature-based solutions, increasing renewable energy and resource efficiency, and taking a place-based approach. The NRP also sets the context for Area Statements (AS), which have been produced by Natural Resources Wales (NRW) (see below), ensuring that the national priorities for sustainable management of natural resources inform the approach to local delivery. Local Planning Authorities must have regard to the relevant Area Statement in Local Development Plans.

The National Strategy for Flood and Coastal Erosion Risk Management in Wales

3.18 In line with the Flood and Water Management Act (2010), Welsh Government has produced its second national strategy on flood and coastal erosion risk management (FCERM)

(October 2020). The strategy sets out how the Government intend to manage the risk and sets objectives and measures of all partners, including NCC, for the next ten years. A replacement LDP will need to recognise the risk and provide a policy framework which looks to prevent exposure to risk which will be informed by the anticipated Wales Flood Map.

Wales Transport Strategy

3.19 The WG have recently begun consultation for a new Wales transport strategy: a vision for transport in Wales (November 2020). The overarching vision for the strategy is to achieve 'An accessible, sustainable transport system'. The WTS is a statutory document required by the Transport (Wales) Act 2006 (The Act). The strategy covers all modes of transport, setting out the government's strategic priorities and desired outcomes, providing a link to wider priorities as well as plans at the local authority level. The development of this strategy will have a clear impact on a replacement LDP.

■ Regional Context

Strategic Development Plans (SDP)

3.20 The aim for the SDP is to address regional factors such as housing, employment and transport across the region. It is anticipated that Newport will be part of an SDP area which shall be in alignment with the emerging Cardiff Capital Region (CCR) City Deal proposals. LDPs will continue to have a fundamental role in the plan led system. The Welsh Government are currently consulting on the regulations for the establishment of Corporate Joint Committees (CJC) as well as the subordinate legislation for the procedure to produce SDPs in Wales. The CJC will be responsible for delivering strategic planning and therefore it is expected progress on the South East Wales Strategic Development Plan will occur post consultation in 2021.

3.21 The UK Government has agreed to a 1.2bn City Deal for the Cardiff Capital Region in partnership with the Welsh Government and ten Local Authorities, including Newport City Council. As set out in the report 'Powering the Welsh Economy', the Cardiff Capital Region is intended to encourage the ten local authorities and other key partners in its boundaries to work together and collaborate on projects and plans for the area. This includes investment in the regions infrastructure, creation of a non-statutory Regional Transport Authority, development of capabilities in compound semiconductor applications, creation of Skills and Employment Board, future employment support, Regional Business Organisation and commitment to a partnership approach to housing and regeneration. The authorities forming the Capital Region are continuing to work on a City Deal bid to fund projects aimed at boosting the competitiveness of the region over the next 20 years. The progression of the Cardiff Capital Region agenda, City Deal Bid and any subsequent implications for the LDP will be given further consideration.

Western Gateway

3.22 The Western Gateway is a recently established strategic partnership that aims to deliver an economic powerhouse that will drive growth on both sides of the Severn. As an equal partner, Newport is expected to be a key player in the success of the Western Gateway and capitalise on the benefits of greater collaboration. In November 2019, the Western Gateway was formally launched as a strategic partnership promoting and maximising economic growth across South Wales and the West of England to create jobs, boost prosperity and support the universities and businesses of the region.

3.23 The strengths associated with working in partnership with authorities in the Western Gateway will need to be fully capitalised on with the creation of the RLDP.

3.24 Natural Resources Wales is required to prepare Area Statements (AS) under section 11 of the Environment (Wales) Act, 2016. These Area Statements are developed to help facilitate the implementation of the National Natural Resources Policy (NRP) and build on the evidence set out in the State of Natural Resources Report (SoNNAR). The South East Wales Area Statement (SEWAS) was published on 1 April 2020. It has taken a landscape scale approach considering where and why we want to build ecosystem resilience in terms of the special and distinctive landscape areas of South East Wales. The SEWAS has been produced to inform planning and helps stakeholders consider different ways of working together to meet the four strategic themes:

1. **Linking our landscapes** – identifying local opportunities for protected sites, natural and built environments to contribute towards resilience of wider priority habitat networks in the region.
2. **Climate Ready Gwent** – identifying landscape and regional scale opportunities and collective interventions for climate adaptation and mitigation which enhance local ecosystems and community resilience.
3. **Healthy Active Connected** – identifying opportunities and collaborative interventions that protect and improve health and wellbeing.
4. **Ways of Working** – identifying the benefits of strategic regional collaboration and identifying that we need to do at a regional scale to maximise local delivery and natural resource benefits.

3.25 The replacement Local Development Plan is required to have regard to and be consistent with this SEWAS and this will be judged against a test of soundness at examination.

■ Neighbouring LPAs

- 3.26 Considering the exceptional circumstances being experienced through the Covid-19 pandemic, progressing an LDP in line with agreed Delivery Agreements has been a challenge. Technical work has been progressed by LPAs, but a revised Delivery Agreement is required to agree a new way forward for RLDP preparation. The stage to which our neighbouring authorities reached pre Covid-19 is set out below.
- 3.27 **Cardiff City Council** adopted their LDP on 28 January 2016. The LDP has a plan period of 2006-2026. Following the fourth year of adoption the Council began the review of the LDP. The Review Report and Delivery Agreement were put out for public consultation in early 2020 but due to the impact of Covid-19, both are in the process of being updated and consultation ended in February 2021.
- 3.28 **Caerphilly County Borough Council** adopted their LDP on 23 November 2010. The LDP has a plan period of 2006-2021. Following consideration of the second AMR (2013) the Council resolved to commence work on the Review of the LDP. The deposit Replacement LDP occurred early 2016 but on 11 October 2016, following receipt of objections from Welsh Government, the Council resolved to withdraw the RLDP. On 23 October 2019 the Council agreed to commence work on a full revision of the adopted LDP and have produced a new draft review report. The updated Delivery Agreement (reflecting the Covid situation) is currently out for consultation due to end 29 March 2021. The Council is also out for a call for Candidate sites which ends 31 August 2021.
- 3.29 **Torfaen County Borough Council** adopted their LDP in December 2013. The LDP covers the period 2013-2021. Torfaen Council resolved to review the LDP in 2017. Work on the RLDP began on 10 March 2020 following approval of their DA. The Council are currently out for consultation on their Preferred Strategy which is due to end on 26 March 2021.

- 3.30 **Monmouthshire County Council** adopted their LDP on 14 February 2014. The LDP has a plan period of 2011-2021. Monmouthshire Council resolved to review the LDP in 2017. Work on the RLDP began on 14 May 2018 following the approval of their DA from WG; the plan period for the RLDP is 2018-2033. The publication of the WG population and household projections have meant that the Council has had to revisit both the Growth and Spatial Options and Preferred Strategy stages of the RLDP process. An updated DA has been agreed by Welsh Government in October this year and work will progress in line with this new timetable.

■ Local Context

2018 Based Population and Household Projections

- 3.31 The Office for National Statistics published the 2018-based local authority population projections on 27 February 2020. These were subsequently republished on 11 June 2020 revising an error discovered in the February data release. The projections provide an indication of the possible size and age structure of the population in the future for local authorities in Wales for the period 2018 to 2043. Newport has the highest projected increase in population of 5.1% over these years. Similarly, the 2018-based local authority household projections were published on 27 February 2020. The projections provide an indication of the future number of households and their composition in Wales. Again, Newport has the largest increase in households by 6.9%. These projections will form the basis of analysis for a revised LDP for Newport.

Newport Local Well-Being Plan

- 3.32 Under the provisions of the Well-Being for Future Generations Act, a Public Service Board (PSB) must be set up for each Local Authority in Wales. Newport established the One Newport PSB, and this partnership published the Local Well-Being Plan for Newport⁴ on 1 May 2018.

⁴ <http://www.newport.gov.uk/documents/One-Newport/Local-Well-being-Plan-2018-23-English-Final.pdf>

3.33 The Well-Being Plan sets out the PSBs priorities and actions for the period 2018-2023. Firstly, the Plan takes the seven Well-Being goals and has set out thirteen priorities. Four well-being objectives have then been developed to deliver against the Well-Being goals and priorities; these are:

- 1) People feel good about living, working, visiting, and investing in Newport
- 2) People have skills and opportunities to find suitable work and contribute to sustainable economic growth
- 3) People and communities are friendly, confident, and empowered to improve their well-being
- 4) Newport has healthy, safe, and resilient environments

3.34 Finally, five integrated interventions have been agreed to ensure the priorities were tackled in a targeted and focussed manner. The five interventions all have some direct or indirect influence over the development plan process; they are:

- **The Newport “Offer”** – the complete package of a desirable city to live and work.
- **Strong Resilient Communities** – taking a preventative place-based approach.
- **Right Skills- Access** - to skills and education that align with employment opportunities.
- **Green and Safe Spaces** –greener, healthier, and safer place with equal access to quality space.
- **Sustainable Travel** – efficient, safe, and accessible transport with low impact on environment.

3.35 There has been annual reporting on the Newport Well-Being Plan since its publication and a review is currently being undertaken. There is a requirement for a Well-Being Plan to be published no later than one year after the date of each ordinary election to the local authority, which is May 2022. The work for the next well-being plan will overlap with the development of the RLDP and a collaborative relationship between the two processes will be maintained. This will ensure that the RLDP has had regard to the Well-Being Plan as they are both developed. The Well-Being Plan is recognised as a fundamental part of the evidence base for development plans as set out in Planning Policy Wales.

Corporate Plan

3.36 The Newport Corporate Plan (2017-2022) sets out how the Council will build on successes and Build a Better Newport. The plan sets out how this will be done by focusing on jobs and the economy, education and skills, fairness and equality, community safety and cohesion, the environment, transport, culture, and social well-being. The four commitments set out in the plan, Resilient Communities, Thriving City, Aspirational People and Modernised Council, each have aspects that will influence and direct the focus of a RLDP. This impact from the plan can be seen in land use terms through focussing on achieving Council asset transfers, meeting the city’s dementia friendly status, focusing on increased SME development in the City, dealing with parking problems, new waste facilities, improved or new education and skill facilities, meeting social care capacity requirements and delivering neighbourhood service hubs.

3.37 The corporate plan is supplemented by three relevant corporate strategies – Digital Strategy, Strategic Equality Plan and Welsh Language Strategy. The Digital Strategy (2015-2020), currently under review, sets out how the Council will enable connectivity and increase access to service. The focus is for Newport to become a digital city which empowers its citizens, customers, and business through the innovative use of digital services. The Strategic Equalities Plan (2020-2024) will be an integral piece of information for the Integrated Assessment work undertaken for a RLDP. The Welsh Language Strategy (2017-2022) sets out a vision that ‘the people of Newport can use Welsh in all parts of life’. The RLDP will take the aims of this strategy into account when undertaking its language impact assessment, and when engaging on plan preparation, as well as the direct land use implications e.g. provision of welsh language schools.

3.38 The Council has recently signed up to the **Placemaking Wales Charter**; by signing up to the Wales Placemaking Charter the Council pledges to:

- Involve the local community in the development of proposals
- Choose sustainable locations for new development

- Prioritise walking, cycling and public transport
- Create well defined, safe, and welcoming streets and public spaces
- Promote a sustainable mix of uses to make places vibrant
- Value and respect the positive distinctive qualities and identity of existing places.

3.39 In addition, the Council has also signed up to the **Healthy Travel Charter** for Gwent. This charter commits those twenty-one leading public sector organisations in Gwent to support and encourage staff to travel in a sustainable way to and from work. Through 15 ambitious commitments, the charter promotes walking, cycling, agile working and the use of public transport and ultra-low emission vehicles. The aim is to increase sustainable journeys made to and from workplaces, reducing the impact on the environment and improving health in Gwent for current and future generations.

Other Council Plans and Strategies

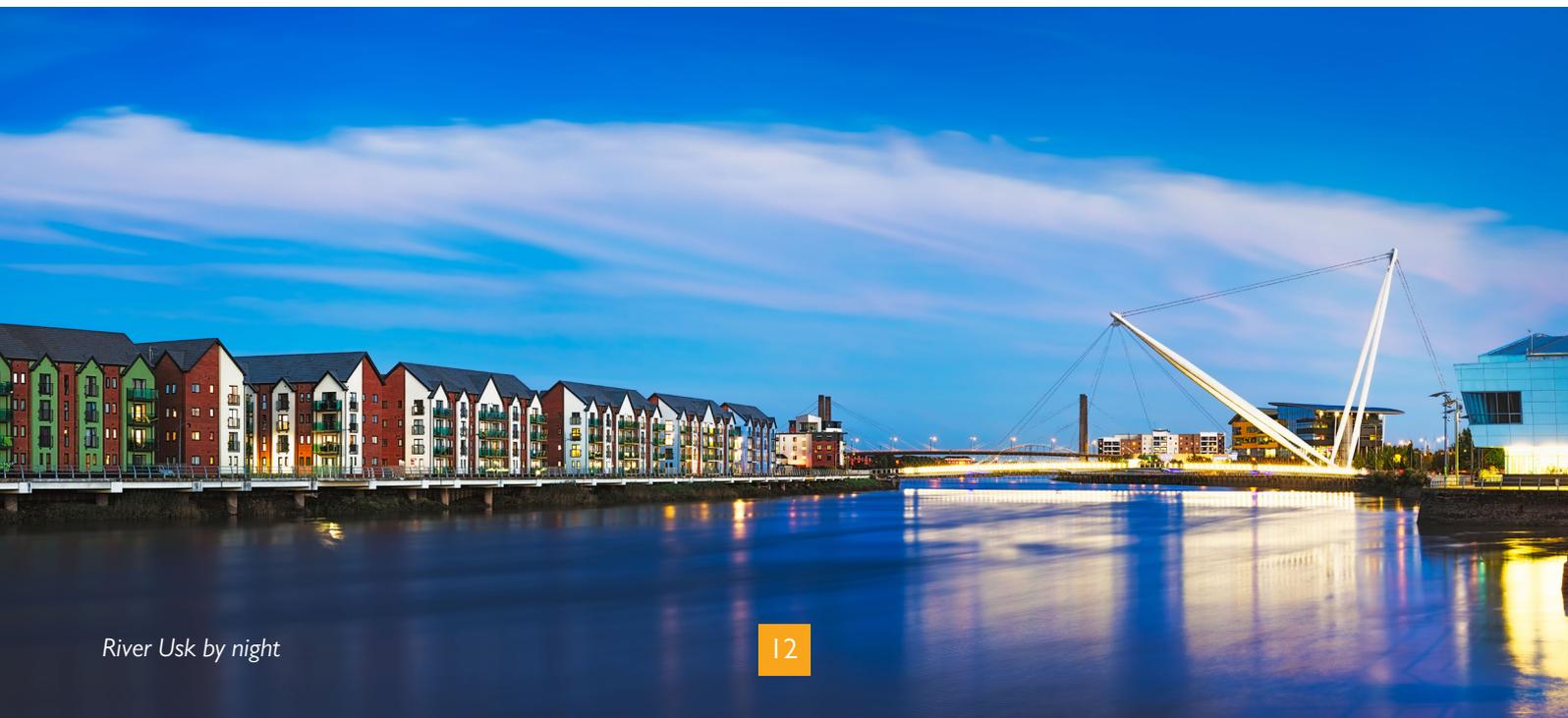
3.40 The national and regional context has seen much change, and this is reflected within the Council's own work programme. There are several relevant plans and strategies created since the adoption of the LDP which will provide an updated or new approach to local matters. A summary of the most relevant plans and strategies is set out below:

3.41 The Newport Economic Growth Strategy

(EGS) adopted in 2015, commits to a ten-year vision and framework for building Newport's economy. Since 2015, Newport has become a more competitive city with a growing influence in high value sectors. We have developed a multitude of training and development routes for future workers and the City is experiencing a rapidly expanding tourism sector. Newport now has a pivotal role in the success of both the Cardiff Capital Region and Western Gateway Partnerships and as an organisation we are embracing new ways of working. The Economic Growth Strategy, refreshed in February 2020, was updated to ensure that Newport is maximising opportunities to enable and facilitate growth as well as complimenting the ongoing physical regeneration of the City. A recovery addendum (2020) for the EGS was produced by the Council in June 2020 to set out how the Council will support the city's economic stability and growth in the wake of the coronavirus pandemic.

3.42 The **Newport City Centre Masterplan (2019 – 2029)** sets out the Council's strategic framework for city centre regeneration. This was updated in 2019 to reflect the progress made to date and a new vision and set of priority projects was been approved.

3.43 The requirements of the **Active Travel Act 2013** have meant the Council has undertaken a series of existing and integrated Route Maps; this will provide a new evidence base for RLDP work on sustainable travel matters. There is a clear role set out for the planning system



to facilitate active travel, and the RLDP will need to consider the outputs of the legislative requirements of the act. This national action plan sets out the Welsh Government vision and how this cultural shift towards prioritising active travel is undertaken e.g. through developments, planning policy, planning obligations etc.

3.44 **The Waste Strategy for Newport (2019-2025)** was adopted in February 2020 and this sets out the objectives, action plans and monitoring programme to ensure all elements linked to improved recycling are strategically driven and robustly monitored. A land use based action includes the provision of new facilities such as Household Waste Recycling centres.

3.45 **The Biodiversity and Resilience of Ecosystems Duty Report 2019** is a requirement of the Environment (Wales) Act 2016 and it outlines how the organisation has addressed its biodiversity duty and consequently achieves its Well-being objectives and Nature Recovery Plan objectives. The report shows a positive approach and highlights those projects and ambitions for future working that can provide evidence and relevant input to a new RLDP. An aim of the Council, and PSB, is to develop a Newport-wide Green Infrastructure Plan. Such a plan and the evidence behind it will be a key informative for a replacement LDP and satisfy the requirement of Planning Policy Wales for such an assessment.

3.46 Newport has 11 **Air Quality Management Areas (AQMA)** and since the LDP was adopted an SPG has been developed to ensure that air quality impacts are adequately dealt with through the planning application regime. The work being undertaken by WG on revising Technical Advice Note 7 and the new development allocations within a RLDP means that the plan will need to consider the impact on air quality at the strategic scale. An Air Quality Action Plan will be developed by the Council and work related to this will inform a RLDP. The recent publication of the **Clean Air Plan for Wales: Healthy Air, Healthy Wales (2020)** clearly establishes this topic as a concern. A RLDP will consider its impact and the role planning can take in assisting in tackling the causes of poor air quality.

3.47 Flood risk is a key concern for the Newport area, and one type of water management that the planning system can influence is the **Sustainable Drainage (SuD)** solution for new developments. The Flood and Water Management Act (2010) established the creation of **Sustainable Drainage Approval Body (SAB)** in local authorities. The legislation gives those bodies statutory responsibility for approving and in specified circumstances, adopting the approved drainage systems. From 7 January 2019, all new developments of more than 1 dwelling house or where the construction area is more than 100m², require SuDs for surface water. From this date onwards, SuDs on new developments must be designed and built in accordance with Statutory SuDs Standards and must be approved by the local authority SAB before construction work begins. This clearly has an impact on development requirements and future flood assessment work undertaken for the RLDP.

3.48 **Newport Destination Management Strategy and Action Plan** recognises Newport's strengths and addresses Newport's weaknesses as a destination, identifying key actions needed to improve the visitor experience, as well as on-going actions which underpin this. Tourism is vital to Newport's economy, which has seen a transformational shift in jobs from heavy industry and manufacturing to jobs in the public sector and service industries, of which tourism is a crucial sector representing about 5% of the total workforce. The importance of sports and tourism and events to Newport continues to increase with the draw of the Newport International Sports Village, National Velodrome, improved Rodney Parade facilities, the International Convention Centre, and the Ryder Cup venue at the Celtic Manor. The importance of such events was clearly set out in the adopted LDP strategy.

■ Covid-19 Pandemic

3.49 The Covid-19 health emergency has posed significant and unprecedented challenge and the long-term impact on businesses and societal norms is still not clear. The role of planning to aid any economic and social



recovery will need to be considered in the evidence base for any replacement LDP. Of note is the fact that the Coronavirus pandemic has had a massive impact on the way people work, travel, use open green space etc. It has also had an impact on terms of the reduction in the delivery rates of dwellings, and development in general, and we inevitably expect to record lower completions in 2020; we are hopeful that from 2021 and beyond, delivery rates will improve. The Council has set out its strategic recovery aims which outline how we shall continue to build a better Newport. This work has resulted in an addendum to the Economic Growth Strategy that sets out how business are being supported during this crisis (see above). Planning has a role to play in dealing with the impacts of this pandemic and this will be reflected in a replacement plan.

in the recovery period after the Covid-19 pandemic. The objective is that the planning system is centre stage in the consideration of built and natural environment issues that have arisen from the pandemic. The paper highlights the existing policies and tools to use for planners towards their aim of better places to live work and relax in. The importance of our environments has been emphasised through this crisis and although the system should do all it can to support economic recovery, this is not to be at the expense of environmental and social factors; the placemaking agenda is to be embraced by all involved in the planning system. This clarification is welcomed and will inform the focus of how to approach the impact on the pandemic in a future LDP.

Building Better Places (July 2020)

3.50 The Welsh Government published 'Building Better Places: Placemaking and the Covid-19 Recovery' in July 2020. The document sets out the planning policy priorities to assist in acting

4. AMR

Key Findings

4.1 As advised in the LDP Manual, a plan review should, amongst other things, draw on the findings of published Annual Monitoring Reports (AMRs). The most recent AMR for Newport was published in October 2020 and covers the period 1 April 2019 – 31 March 2020.

4.2 Overall, the LDP has made positive impacts and the policy framework has been effective in achieving truly sustainable development. The table below sets out a summary of the past five AMRs, this is followed by a quick overview of the assessments and recommendations of each AMR

| Indicators | 2016 | 2017 | 2018 | 2019 | 2020 |
|---------------------------------|------|------|------|------|------|
| Contextual | | | | | |
| Positive | 2 | 1 | 3 | 3 | 1 |
| Mixed | 1 | 0 | 0 | 1 | 0 |
| Negative | 1 | 3 | 1 | 0 | 3 |
| Core and Local | | | | | |
| Positive | 21 | 16 | 17 | 19 | 16 |
| Training required | 6 | 7 | 5 | 5 | 6 |
| SPG Required | 0 | 0 | 0 | 0 | 0 |
| Further research | 7 | 12 | 13 | 11 | 13 |
| Policy Review | 1 | 0 | 0 | 0 | 0 |
| Plan Review | 0 | 0 | 0 | 0 | 0 |
| Sustainability Appraisal | | | | | |
| Sig Positive | 37 | 44 | 53 | 41 | 44 |
| Mix effects | 18 | 30 | 22 | 34 | 29 |
| Sig Negative | 0 | 4 | 2 | 1 | 2 |
| No data/ baseline | 29 | 6 | 7 | 8 | 9 |

- 4.3 Baseline for monitoring was set in the 2016 AMR. It concluded that overall significant progress was made particularly regarding housing growth and the strategy was being achieved. Employment land delivery was progressing but not at the predicted rate. No indication that a full or part review was required.
- 4.4 For the 2017 & 2018 AMRs the conclusion was again, significant progress was being made with specific reference to housing growth. Also, the strategy, key aims and objectives were being realised. Research on topics including retail, flood risk and delivery of Gypsy and Traveller accommodation were noted as well as concern raised over the loss of community facilities, decreasing city centre footfall and lack of progress on the number of Air Quality Management Areas. The strategy, key aims and objectives were being realised and there was no indication for a full or partial review of the LDP.
- 4.5 The 2019 AMR concluded that significant progress was still being made particularly in reference to housing growth and delivery of employment land. The Strategy, aims and objectives were still being fulfilled. Flood risk and the provision of Gypsy and Traveller transit accommodation were again noted. The LDP was coming up to its fifth anniversary (January 2020) and reference was made to the requirement to review every four years. In particular, the success of allocated housing sites means that there is a need for further allocations. This was the first time SDP was noted which would also trigger a LDP review. It was concluded that discussions with Members and WG would begin on the need for a review.
- 4.6 Finally, the 2020 AMR concluded for the fifth year that significant progress is being made particularly in reference to housing growth and delivery of employment land. The Strategy, aims and objectives are still being fulfilled. city centre footfall levels, flood risk and gypsy and traveller transit accommodation were again noted. Access to local services and facilities have been highlighted and the need for additional residential sites was acknowledged. It was also noted that Welsh Government

officers recommended that a review is undertaken as we have clearly passed the four-year threshold. In addition, the NDF is on its way and will have clear consequences for the Newport area. The role planning can play in economic recovery following Covid is also key. Therefore, the AMR recommendation was for a formal review of the LDP to be undertaken. This review report is the first stage in moving towards a replacement LDP.

Continuing good practice

- 4.7 The policy framework of LDP has been successful in many ways including: delivering its brownfield strategy; housing supply has predominantly been delivered on allocated sites; there is a clear policy framework to encourage renewable energy schemes; no objections from Welsh Water; Newport is meeting its job creation targets; trees and woodlands are being protected and the Council is meeting and exceeding waste targets.
- 4.8 The Sustainability Appraisal has predicted significant positive effects from the implementation of the LDP including: achieving good levels of access to natural greenspace from new residential development; water pollution has not been identified as a concern; electricity consumption per household is reducing. There has been no loss of Public Rights of Way, SINC, greenfield land, loss of woodland, loss of valuable agricultural land, unless the losses have been in accordance with LDP policies. No objections from policy architectural officer; increase in welsh medium education; increased use of rail and the affordable housing delivered in the plan period has met National Design Standards.
- 4.9 It is important to understand the successes made to date to ensure the policy framework remains robust and effective.



AMR Topics for further investigation

4.10 There are inevitably topics which deserve a particular focus to reflect on their impact and provide a clear steer not only for the level of review required for the LDP but providing an overview of key issues for a replacement LDP to consider.

Housing Delivery

4.11 The housing delivery rates achieved since the adoption of the LDP have been impressive and Newport is one of the few authorities in Wales to achieve a consistent 5-year land supply of housing. Figure 1 below illustrates the housing delivery achieved to date.

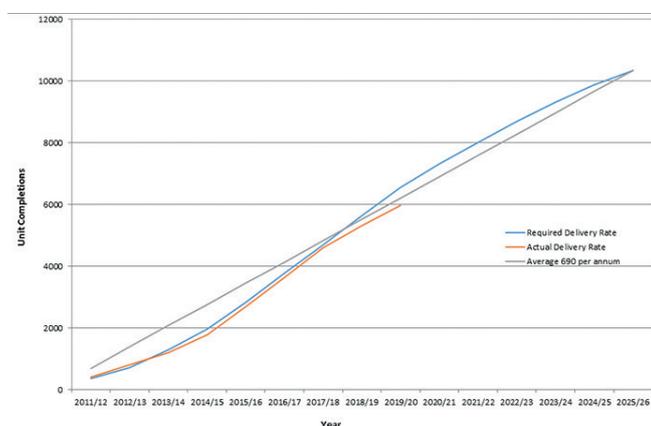


FIGURE 1: LDP HOUSING DELIVERY

4.12 On reflection, the data illustrates that 86% of housing delivery has been delivered on LDP housing allocated sites, with the highest level of windfall completions occurring in the sixth year of the plan. It is possible the reliance on windfall sites will increase as allocated sites are completed, reducing clarity for developers, and undermining the plan-led approach. In addition, 94% of housing has been delivered on previously developed land, consistent with LDP strategy. To deliver sustainable development, the focus on previously developed sites will be recommended where possible.

4.13 The LDP has two strategic housing sites which have been subject to specific monitoring. Both sites are progressing and remain an important supply of housing for the Council, albeit that the rate of delivery has been below that agreed in the LDP. The analysis of the delay is set out in the Annual Monitoring Reports for the LDP in Monitoring Objectives MT4OB4&5.

The need for specific allocations and monitoring details will be considered as part of any new LDP.

4.14 It is not clear whether future levels of growth can be accommodated predominantly on previously developed land over the next plan period. In addition, the NDF highlights Newport as an area for national growth and this will clearly impact on the level of land requirements. The 2018 population projections and household projections show that Newport have the highest level of growth nationally. The need for integration of employment and housing will also place a pressure on the take up of brownfield land from other uses. The impact from Covid-19 on build rates is yet to be quantified but we are predicting healthier rates from 2021 which mean we remain in a strong position to hit the LDP requirement by the end of the plan period. The success of the allocated housing sites means that with the current completion levels and clear progression of many other allocated sites. This does mean that new sites will need to be found to continue this successful achievement to ensure a sufficient housing land supply is maintained.

Affordable Housing

4.15 There has had an outstanding result in terms of having currently delivering 94% of the affordable housing target for 2015-2020. This reflects the increased level of Registered Social Landlord schemes within Newport. The LDP target reflected a realistic provision anticipated from the planning process. That is to say that the affordable housing target was not a direct reflection of all housing need for Newport. This level of need is acute, and the planning system remains one route to providing a supply to meet the demand. Therefore, an assessment of housing need, linked to the previous section on housing delivery, is required and this will provide an updated analysis of housing need for Newport.

4.16 The allocation of new sites, consideration of submarket areas, policy thresholds and impacts on viability will all serve to ensure a future LDP is based on up to date evidence. Monitoring has illustrated that further research on this matter is required because in practice, the level of contributions does not always meet that required by policy.' It is therefore key that work

is undertaken on this matter to ensure that appropriate percentages are set to reflect the increased house prices and up to date build costs.

Gypsy and Traveller Transit

4.17 The LDP has provided a residential Gypsy and Traveller site which covers the identified need set out in the GTAA for the plan period. The GTAA process is ongoing and a future LDP will need to consider if an updated assessment identifies any further need for such accommodation. This assessment also considers the need for transit accommodation, not yet delivered by the current LDP. The introduction of the SDP process will allow this matter to be considered at the regional scale, which is considered a much more appropriate scale. It is therefore concluded that the RLDP process should update the GTAA evidence base and reflect the outcome in its allocation and policy development.

Employment Land Delivery

4.18 The strategy for the LDP sets out an ambitious target for employment growth in terms of land supply and job creation. The number of jobs created over the plan period is above the forecasted trends and economic activity rates are above the Wales average and although the level of predicted development on allocated employment sites is lower than anticipated, it is considered the case that there is a development lag in delivery rather than specific concerns with the land allocations. There has been some loss of employment land to other uses, but this none of which has been approved on allocation employment land. There is still a 13-year land supply for employment uses available in Newport. Nonetheless, the growth rate required for housing supply for the next plan period and the impact from the global pandemic and the way in which it influences how we work in the future, will require a review of the level of job creation and employment land supply to ensure the strategy is robust and well considered.

Retail and City Centre Footfall

4.19 City centre footfall has unfortunately been

falling for several years and the impact from the pandemic will have only exacerbated this. This is not unique to Newport, but it is worth noting the recent investment which indicates the markets confidence in Newport. Since the adoption of the LDP, the centre has seen the completion of the Friars Walk development which has provided a retail and leisure focus to the city centre. It was appreciated in the LDP examination that once this redevelopment had taken place there would be a need to consider its impact and this will be a key consideration for the Council within its review. Work has been undertaken by the Council to provide an up to date evidence base on this matter for development management purposes through the commission of the Nexus Retail and Leisure Study (2019). In addition, the Council has published its City Centre Masterplan and the economic growth strategy and addendum, as detailed in section 3.36 of this report. Clearly a replacement LDP will have to consider these challenges facing the city centre and reflect on the functionality of the space over the next fifteen years.

Flood Risk

4.20 Newport's location alongside the Severn Estuary, the River Usk dividing the city, the complex reed network of the Gwent Levels and the various other pluvial and fluvial water sources within its boundary means that flood risk management and resilience is a key consideration for the LDP. The forthcoming update to national planning policy, through Technical Advice Note 15 and the production of new All Wales Flood Mapping, will require the LDP to take into account this updated policy and evidence base context. A Strategic Flood Consequence Assessment for the RLDP will be required to ensure that any new allocations are justified in terms of any impact on flood risk.

Out Commuting

4.21 The level of out commuting from Newport to other areas is noted but is not considered a significant concern. The strategic location of Newport and its proximity to Cardiff and Bristol means that out-commuting is always going to be a factor, but the plan will need to

consider how to reduce this in the interests of creating a sustainable city. There are many factors that are to be considered within the plans strategy to ensure that this is achieved, including provision for appropriate levels of employment land so we can ensure we are providing jobs as well as housing.

Access to facilities

4.22 Since the adoption of the LDP the Welsh Government have published an updated Index of Multiple Deprivation for Wales (2019). This will be used as a part of the evidence base for a replacement LDP, particularly using the 'access to services' section as a tool to understand where the plan could focus on resolving any known concerns in terms of access to facilities.

Policy Revisions

4.23 Section 5.3 of this report sets out an assessment of the current policy framework of the LDP. It is worth noting that there are a number of policies in the LDP that have been highlighted in the previous AMRs which require specific investigation so that their effectiveness is strengthened in a future LDP. These areas are:

- Community Facilities
- Mineral Safeguarding Area
- Alternative Use of Employment Land
- Loss of Environmental Space
- Site of Historical value
- Development Densities



5. Potential changes required

5.1 Review of LDP Vision, Issues and Objectives

LDP Vision

5.1.1 The Vision was developed to provide the core of the LDP, driving forward the intended changes for Newport from 2011. The development of the Vision was derived from the Newport Community Strategy (2005-2015), where those elements relating to and affected by land use were included.

LDP VISION (2011-2026)

As a gateway to Wales, Newport will be a centre of regeneration that celebrates its culture and heritage, while being a focus for varied economic growth that will strengthen its contribution to the region. It will be a place that people recognise as a lively, dynamic, growing city, with communities living in harmony in a unique natural environment.

The objectives of the plan are set out in section 4 and work will be underway in 2021 on an updated Well-Being Plan for publication in 2023. This review process provides an opportunity to consider the implications of the current context, since adoption of the LDP, and ensure the Vision is appropriately worded.

LDP Objectives

5.1.3 The LDP Vision is delivered through ten Plan Objectives which seek to ensure the delivery of a sustainable development strategy. The ten objectives were developed specifically for the LDP from the Council's Five Corporate Objectives (Caring, Fairer, Learning and Working, Greener and Healthier and Safer City). They were subsequently refined through public consultation.

5.1.4 A review of LDP objectives against the Seven Well Being Goals for Wales⁵ is set out below. The table illustrates which of the seven well-being goals are being delivered by each objective.

5.1.2 Since the adoption of the LDP, the Community Strategy was replaced by a Single Integrated Plan which has been replaced by the Local Well-Being Plan; a requirement of the Well-Being of Future Generations Act (2015).

⁵ For details of the Well-Being Goals please visit: <https://www.futuregenerations.wales/about-us/future-generations-act/#:~:text=The%20Well-being%20of%20Future%20Generations%20Act%20requires%20public,such%20as%20poverty%2C%20health%20inequalities%20and%20climate%20change>.

| LDP Objectives | Well – Being Goals | | | | | | |
|--|--------------------|-----------------|-----------------|------------------|-------------------------------|--|----------------------------|
| | Prosperous Wales | Resilient Wales | Healthier Wales | More Equal Wales | Wales of Cohesive Communities | Wales of vibrant culture and thriving Welsh Language | Globally responsible Wales |
| 1. Sustainable Use of Land To ensure that all development makes the most efficient use of natural resources by seeking to locate development in the most sustainable locations, minimise the impact on the environment and make a positive contribution to local communities | | | | | | | |
| 2. Climate Change To ensure that development and land uses in Newport make a positive contribution to minimising, adapting to or mitigating against the causes and impacts of climate change, by incorporating the principles of sustainable design, changes to travel behaviour, managing the risks and consequences of flooding, and improving efficiency in the use of energy, waste and water. | | | | | | | |
| 3. Economic Growth To enable a diverse economy that meets the needs of the people of Newport and those of the wider South East Wales economic region | | | | | | | |
| 4. Housing Provision To ensure that there is an adequate supply of land for housing in the most sustainable locations, and to ensure that the quantity, quality and variety of housing provision meet the needs of the population. Also to foster the creation of places which contribute to local distinctiveness and thriving communities. | | | | | | | |
| 5. Conservation of the Built Environment To ensure that all development or use of land does not adversely affect, and seeks to preserve or enhance, the quality of the historic and built environment. | | | | | | | |
| 6. Conservation of the Natural Environment To protect and enhance the quality of the natural environment, including landscape, protected habitats and species of principal importance for biodiversity in Wales (regardless of greenfield or brownfield status) and the protection of controlled waters. | | | | | | | |
| 7. Community Facilities and Infrastructure To ensure the provision of appropriate new, and/or enhanced existing, community facilities, and to safeguard existing well-used facilities. | | | | | | | |

| | | | | | | | |
|--|--------|--------|------|-------|-----------|-------|------------|
| <p>8. Culture and Accessibility To ensure that development proposals and uses are socially and physically accessible to all, taking account of the needs of all individuals.</p> | Yellow | White | Pink | Red | Dark Blue | Blue | White |
| <p>9. Health and Well-Being To provide an environment that is safe and encourages healthy lifestyle choices and promotes well-being.</p> | Yellow | Orange | Pink | Pink | Dark Blue | Blue | Light Blue |
| <p>10. Waste To ensure that waste management choices are based on the proximity principle, where appropriate, and a hierarchy of reduce, reuse, recovery and safe disposal, and that there is adequate provision for facilities to enable this to happen.</p> | Yellow | Orange | Pink | White | White | White | Light Blue |

5.1.5 The current LDP objectives clearly contribute to achieving all seven well-being goals. Some objectives deliver across all seven goals and have clear multi-benefit outcomes. Any changes to the LDP and its objectives will be informed by and be devised in accordance with the Well-Being Goals.

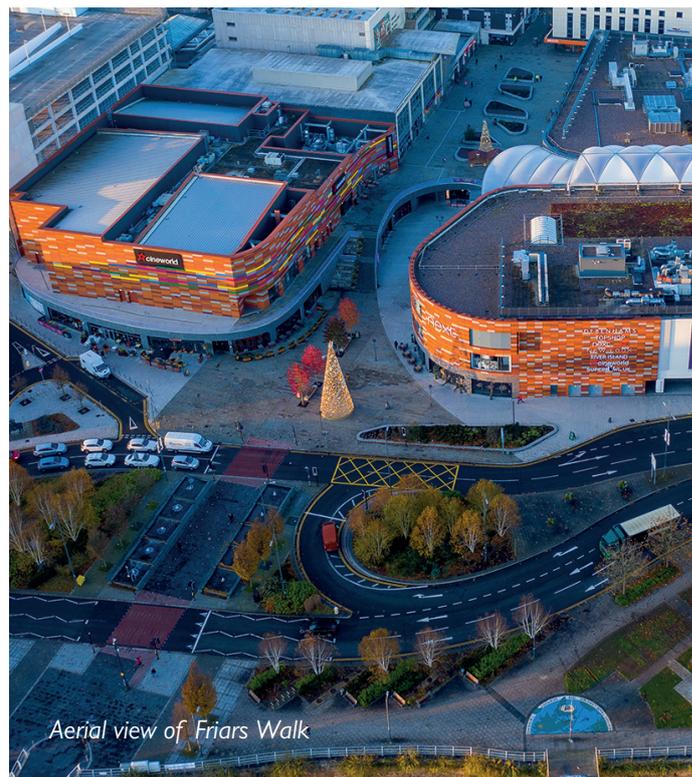
5.2 Review of LDP Strategy

- 5.2.1 The key elements of the current spatial strategy are to:
- to maximise the use of brownfield sites in the interests of sustainability, regeneration, community cohesion, and urban form;
 - to develop the Eastern Expansion Area of the city, focused on the former Llanwern Steelworks;
 - to regenerate the retail core of the city centre;
 - to protect the landscape, including maintaining the statutory Green Belt on the Cardiff boundary;
 - to conserve protected sites and species, and encourage biodiversity;
 - to foster growth of the city in line with its role in the region, its locational advantages and its distinct sense of place;
 - to build upon the success of Newport’s national and international class sporting facilities

In terms of measuring how successful implementing the strategy has been, each point is discussed below.

Maximise the use of brownfield sites in the interests of sustainability, regeneration, community cohesion, and urban form;

5.2.2 The overall preference of the current LDP strategy was for the development of land within the urban boundary particularly focussing on previously development sites. Regeneration was therefore a key element of the strategy where there are vacant or declining sites in need of improvement for economic, social, and environmental benefit. This regeneration focus was directed to industrial sites including the former Llanwern steelworks, former whitehead works, former Novelis factory, but it also sought the improvement of existing housing estates including Ringland and Alway as well as ensuring the city centre is able to meet its full potential, building on the success of Friars Walk redevelopment.



5.2.3 This focus on regeneration within the urban boundary focussing on previously developed sites has been extremely successful. Over the plan period 94% of all houses delivered have been on previously developed sites and all development on greenfield sites has been within the policy allowance of the plan. The success of the allocated housing sites in the last plan means that new sites will need to be found to continue to ensure a sufficient housing land supply is maintained. In terms of spatial distribution, it is likely that while brownfield sites will continue to play an important role in delivering windfall sites, going forward, it is recognised that there is a limited supply of brownfield land and there is likely to be a role that greenfield sites can play in bringing forward high levels of affordable and family housing and wider provision of strategic infrastructure the LDP.

Develop the eastern expansion area of the city, focused on the former Llanwern Steelworks;

5.2.4 The Eastern Expansion Area is focussed on the two large housing led developments at the former Llanwern Steelworks (Glan Llyn) and Llanwern Village. The former being a brownfield development and the latter greenfield. Both sites have not met the agreed rate of delivery set out in the LDP trajectory but both sites are progressing and it is clear to see the creation of new communities with the implementation of the primary school, play spaces and public house. The analysis of the delay is set out in the Annual Monitoring Reports for the LDP in Monitoring Objectives MT4OB4&5. The strategic focus on the development of this area took precedent in the previous LDP. It will remain a key part in the delivery of a future plan.

Regenerate the retail core of the city centre;

5.2.5 The Plan period has seen the successful delivery of the Friars Walk redevelopment, which has made a positive impact on the retail and leisure core of the city. The previous LDP was written before the implementation of the scheme so the retail policies reflect the situation pre-Friars Walk. Since then, the Council has commissioned a Retail & Leisure Study (Nexus 2019) which recommended a

flexible approach in the city centre to attract investment. The level of vacancies, reduction in footfall numbers and pressure for out of town retail remains a concern but the vitality of district and local centres is encouraging. The impact from Covid-19 is clearly a factor in the function and level of investment of a centre such as Newport's and a replacement plan will need to consider the most appropriate policy framework for the benefit of the city.

Protect the landscape, including maintaining the statutory Green Belt on the Cardiff boundary;

5.2.6 Newport has a unique landscape which provides a positive and attractive hinterland to its urban centre. The AMRs have shown that over the last five years the LDP has managed to ensure that developments do not lead to the loss of important landscape or open space without conforming with plan policies. The exceptions are made when harm from e.g. renewable energy schemes are outweighed by the benefits of the proposed use. The Green Belt and Green Wedge policies have protected those areas from inappropriate developments, and they are likely to remain an important part of protecting the openness and coalescence of urban form.

Conserve protected sites and species, and encourage biodiversity;

5.2.7 Newport has a plethora of internationally, nationally and locally designated biodiversity features. Monitoring of the LDP has been successful in the protection of this resource and the potential impact from future development will be a key factor in a replacement Plan. There has been a contextual shift since adoption and the need for an ecosystems approach in decision making. There has also been the introduction for the requirement for Green Infrastructure Assessments set out in PPW and there are clear considerations from the enactment of the Environment Act Wales in 2016 for the next LDP.

Foster growth of the city in line with its role in the region, its locational advantages and its distinct sense of place;

5.2.8 Newport plays an important role in the region due to its advantageous location, good connections, and its valuable cultural and environmental environs. This has been reflected in the National Development Framework and the RLDP will look to utilise this locational advantage and distinct sense of place.

Build upon the success of Newport's national and international class sporting facilities

5.2.9 The importance of sports and events to Newport continues to increase with the draw of the Newport International Sports Village, National Velodrome, improved Rodney parade facilities, International Convention Centre, and the Ryder Cup venue at the Celtic Manor. Events continue with the establishment of the ABP Newport Wales Marathon in 2018 and the more recent Westfield Health British Transplant Games hosted by the city in July 2019. The infrastructure is well established and the ability of Newport to host major events is evident. There are economic and social impacts from such activities which will need to be considered by a RLDP in terms of facility provision, accommodation needs and job creation.

Delivery of LDP Strategy

5.2.10 The LDP set delivery targets for the delivery of:

- 10,350 homes of which 2,061 were to be affordable; and
- 21.5 hectares of employment land, and the creation of 7,400 jobs;

The LDP has been successful in the delivery of its strategy by providing:

- 5,978 homes (only 575 units below plan requirement), of which 1,223 are affordable (only 78 units below the plan requirement);
- 26 hectares of new employment land and the level of job creation remains above the targeted rate;
- 94% housing development on brownfield land;
- The Eastern Expansion Area is progressing with both strategic sites seeing completions;
- The city centre has changed significantly since 2105 with the implementation of Friars Walk

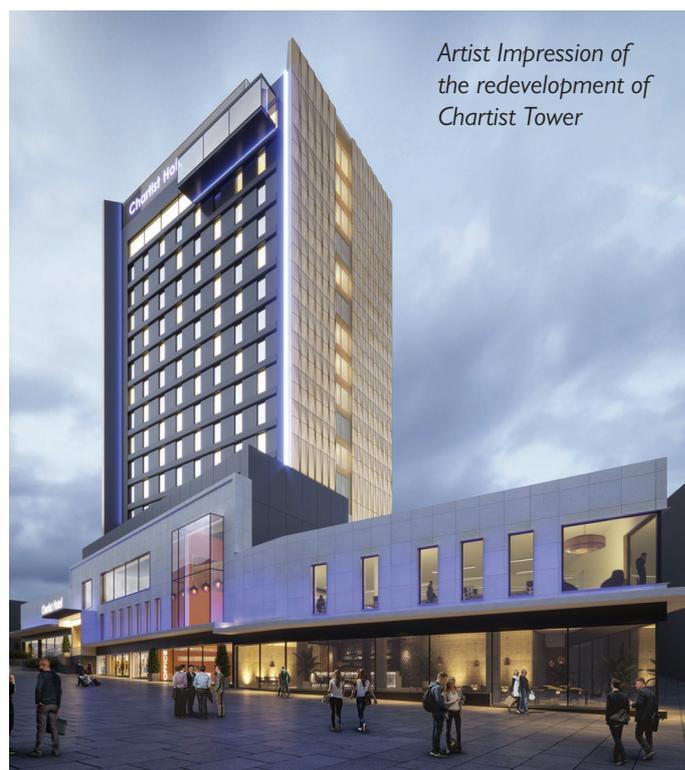
and the more recent investment in city centre regeneration e.g. Mecure Hotel;

- No Sites of Special, Scientific Interest, Sites of Special Nature Conservation, protected trees, Green Belt or Green Wedge land has been lost contrary to policy; and
- The city has hosted a number of sporting and other important events and has seen the creation of more event facilities e.g. ICC at the Celtic Manor.

For information, an overview on the delivery of LDP site allocations is set out in Appendix I.



International Convention Centre



Artist Impression of the redevelopment of Chartist Tower

Conclusion for LDP Strategy

5.2.11 The LDP strategy has been reviewed having regard to the five AMRs, contextual changes, and internal consultation with relevant sections of the Council. Whilst the overall aims of the previous strategy remain relevant the successful delivery of the strategy means that its review is particularly relevant.

5.2.12 The Replacement LDP will cover the period 2021-2036. That will mean that a revised LDP will need to consider the needs of the city, including housing and employment provision, up until 2036. The successful delivery of the adopted LDP will require additional development sites to be allocated. There are also numerous required updates to the LDP evidence base including an up to date Local Housing Market Assessment, Population Projections, Economic Strategy and Land Review, Village Assessment, Gypsy and Traveller Accommodation Assessment. The focus on the city centre regeneration, sporting and events potential as well as protecting our unique environment is likely to continue in line with other Council priorities and the underpinning requirements of delivering sustainable development. There will be a need to consider issues that have come to the fore since the LDP adoption in 2015, including increased concerns on climate change and air quality. All these matters will need to be considered as part of a RLDP.

5.3 Review of LDP Policies

5.3.1 The LDP policies have been reviewed having regard to the following:

- The findings of the past five Annual Monitoring Reports (AMR's);
- Significant contextual changes that have occurred since the adoption of the Plan, including changes in national, regional, and local policies, legislation and strategies;
- Internal consultation has occurred with various departments, including planning committee, within the Council. Virtual focus groups, questionnaires and presentations were used to gather information on the limitations, omissions, and successes of the current policy framework.

5.3.2 A summary of the policy review assessment is set out in Appendix 2. This gives an overview of whether a policy/allocation is functioning effectively, whether any amendments are likely to be needed and whether any policies should be removed or amalgamated as part of the Plan revision process. The policy assessment undertaken to date is not considered to be definitive and further consideration will be given to the need to revise the Plan's policies as part of the revision process.

5.3.3 The revision of the Plan will also need to consider the implications of an extended Plan period. The current Plan runs to 2026, with the Replacement Plan setting a plan period from 2021-2036. Extending the Plan period will result in a revised dwelling need and a requirement for new sites for both market and affordable dwellings. It will need to take account of the revised version of Planning Policy Wales, latest population and household projections and a revised Local Housing Market Assessment, as well as other updates to the evidence base. Furthermore, the review process can also explore the ways that a new plan could respond to current challenges such as the climate change, projected increase in population for Newport and other issues identified below. These updates and issues will need to be thoroughly considered and addressed in a comprehensive manner.

5.3.4 Based on the policy review assessment, the key policy topic areas are discussed in more detail below.

Climate Change: SPI, SP3, GPI, CE10

5.3.5 The LDP looks to tackle the causes and effects of climate change through the adoption of sustainable principles and development. Reflecting on the sustainable foundation of the Plan as a core principle, future iterations will need to reflect on the most up to date considerations and ensure a suitable policy framework.

5.3.6 **Flood Risk:** Much of Newport is located on the floodplain, and consequently Newport deals with a significant number of applications affected by flood risk. Monitoring for the flood

risk policies shows 29 applications have been permitted in flood zone which did not meet the flood risk criteria set out in TAN15 over the 5 years of AMRs. While these applications were considered permissible on the basis of regeneration, or that there was an acceptable level of risk or that there was no discernible increased risk from the development, there is clearly a dichotomy which will need to be investigated further.

5.3.7 Of relevance to the policy review is the forthcoming update to Technical Advice Note 15, the production of new All Wales Flood Mapping, an updated Strategic Flood Consequence Assessment, and the mandatory standards for Sustainable Drainage Systems.

5.3.8 **Renewable Energy:** The past AMRs have found that the renewable energy policies are functioning effectively in respect of the provision of renewable energy, with a total of 11 schemes incorporating on-site renewable energy, creating up to 80.35MW of energy, permitted since the LDP's adoption (excluding permitted development). However, significant contextual changes have occurred in relation to renewable and low carbon energy since LDP adoption which will need to be considered and addressed through the LDP revision process.

5.3.9 Welsh Government produced a revised version of "Planning for Renewable and Low Carbon Energy" in September 2015. The update includes an additional section relating to how local planning authorities assess the potential for solar farm developments. The revised toolkit provides a methodology to assist in the production of Renewable Energy Assessments (REAs) and additional advice on how to translate the results of the REAs into the LDP evidence base, resulting policies and setting targets. Local authorities are expected to undertake a proactive approach to all forms of renewable and low carbon energy generation. The revised LDP will need to consider the revised Toolkit and address the additional requirements set out within it.

Health: SP2, GP7

5.3.10 It is considered that current policies regarding health are functioning effectively. However, as part of the review of the plan a review of these policies will take place to ensure that they cover all aspects of the health agenda that planning has the ability to make a difference. Overall, the plan review process will need to look beyond AMR reporting and the analysis of existing policy in response to the increased evidence, which highlights the links between health and the built environment and seeks to favour the creation of healthier and active environments. In particular, the review process can consider things like the need for dementia friendly environments and explore the links between obesity, health and well-being, air quality and healthy and active lifestyles and the built environment and consider the most appropriate policy response to this changed context. This will be informed by the Health Impact Assessment set out in the Integrated Sustainability Appraisal work for the RLDP.



Green Infrastructure: SP5, SP6, SP7, SP8, SP9, CE1, CE2, CE3, CE9

Heritage: SP9, CE4, CE5, CE6, CE7

5.3.11 The existing open space and accessible natural green space policies contained in the LDP were informed by various technical background papers. These assessed the quantity of outdoor recreation, public open space provision, allotment provision, Green Wedge, Settlement boundary, SINC's etc. across the authority. The new requirement set out in PPW for a Green Infrastructure Assessment will combine the update of these technical papers and other requirements of GIA work to inform plan allocations and policy wording. The effectiveness of the green infrastructure related policies has been monitored by the 5 AMR's produced to date and have shown that that this has been effective.

5.3.13 The Heritage polices are generally considered to be functioning effectively. All previous AMR's have shown that the vast majority of relevant applications received on historic environment assets were considered to be policy compliant subject to conditions/ recommendations placed on the permission. A few applications were permitted with an outstanding objection from statutory heritage advisors and research will be undertaken to understand what alterations may be necessary to aid any concerns raised. Signposting to recent contextual changes e.g. Cadw guidance is likely to be helpful.

Ecology: SP4, SP9, GP5, CE8

5.3.14 The LDP was informed by Habitats Regulations Assessment (HRA), the purpose of which is to assess the impacts of a land use plan, in combination with the effects of other plans and projects, against the conservation objectives of internationally important European sites of nature conservation importance, such as Special Areas of Conservation and Special Protection Areas (designated for their ecological status) and to ascertain (following screening) what needs Appropriate Assessment (AA). This process shall be undertaken as part of the RLDP and any amendments to the policy framework shall be considered.



5.3.12 Given this, it is considered that these policies are functioning effectively there are opportunities to build upon the importance of connectivity by exploring and consolidating upon linkages with other policy areas, particularly those that promote green infrastructure. An appropriate review of evidence and the role of the Placemaking and Design will be undertaken as part of developing an understanding of the benefits and value of such an approach along with a review of the evidence base, to ensure it takes account of changes in national planning policy and contextual changes.

5.3.15 The ecological policies seek to ensure the protection and enhancement of the natural environment, and in doing so, contribute towards moderating the potential adverse effects of other policies that infer physical development even on previously developed land. The polices are generally considered to be functioning effectively but the evidence base will need to be updated to ensure that the relevant designations, species, and habitats are considered. The recent requirement for ecological mitigation will also need to be considered to ensure clarity of process.

Housing: SPI0, SPI1, HI- HI7

5.3.16 Following the revision to PPW and the revocation of TAN 1 in its entirety, the

revised LDP Manual (Edition 3) sets out how annual housing completions must be monitored against the Anticipated Annual Build Rate (AABR). The RLDP will need to include a housing trajectory, developed with key stakeholders including the development industry, taking into account the phasing of sites to ensure that it meets the requirement of the LDP manual.

- 5.3.17 The housing requirement set out in the current LDP is 10,350 dwellings (Policy SPI10) over the Plan period 2011-2026. This figure was primarily informed by the 2008 WG household projections which projected a population rise of 10% over the Plan period. The latest official WG population and household projections (2018) continue to project an increase in population for Newport. The WG projections will be used as the basis for informing the future housing requirement figures for the RLDP. The next plan process will need to assess the most appropriate level of growth for a Plan period beyond the end date of the existing LDP.
- 5.3.18 The housing delivery rates achieved since the adoption of the LDP have been impressive delivering 5,978 units to date, that is only 575 units below the LDP target. (April 2020). Newport has been one of the few authorities in Wales to achieve a consistent 5-year land supply of housing and while the 2020 AMR noted a slight under delivery (4%) against agreed rates for housing sites, set out against the Average Annual Requirement (AAR) it was considered that delivery remain acceptable.
- 5.3.19 The need for integration of employment and housing place a pressure on the take up of brownfield land from other uses. The success of the allocated housing sites in the last plan means that with the current completion levels and clear progression of many other allocated sites, the LDP allocations for housing are meeting demand. This does mean that new sites will need to be found to continue this successful achievement to ensure a sufficient housing land supply is maintained. In terms of spatial distribution, it is likely that while brownfield sites will continue to play an important role in delivering windfall sites, going forward, it is recognised that that

there is a limited supply of brownfield land and there is likely to be a role that greenfield sites can play in bringing forward high levels of affordable and family housing and wider provision of strategic infrastructure the LDP.

Employment: SPI7, SPI8, EMI, EM2, EM3

- 5.3.20 The Local Development Plan's employment land is safeguarded for employment purposes by Policies SPI7 and EMI. The future prosperity of the local economy is facilitated by ensuring that the authority can offer a range and choice of employment sites and premises for employment uses. As part of the revision process, consideration will be given to the employment strategy to take account of the industrial and business allocations that have been developed since LDP adoption. Consideration will also need to be given to the 'economies of the future' and their locational, sites and premises requirements.
- 5.3.21 The AMRs indicate significant progress has been made in reference to the delivery of employment land allocated under Policies SPI7 and EMI. However, it is noted 16 planning applications over the course of the 5 AMR's that involved the loss of employment land did not fully consider policy EM3. This was indicated as "training required". While the majority of applications did consider this policy, any future LDP revision should consider if the policy wording and criteria are, appropriately and workable for the future.

Planning Obligations: SPI3, H4

- 5.3.22 The planning obligations policies are generally considered to be functioning effectively. Amendments may be required in particular with regard to the strategic and site specific viability work and subsequent thresholds set to reflect the updated assessments.

Community Facilities: SPI2, CF1-CF13

- 5.3.23 The community facility policies are generally considered to be functioning effectively, however, consideration should be given to whether there is a need to narrow the definitions within the policies such as community facilities (CF12) and Tourism (CF8) and what opportunity there are to combine underused policies.

Transport: SPI4, SPI5, SPI6, GP4, TI -T8

5.3.24 The review of the Plan's transport policies indicates that there are currently no concerns with their effectiveness and implementation, as detailed in Appendix 2. However, a number of contextual changes have occurred since the Plan's adoption, which will need to be taken into account in the LDP revision process including subsequent outcomes of the South East Wales Transport Commission and Metro.

5.3.25 The Council has undertaken a series of existing and integrated Active Travel Route Maps; this will provide a new evidence base for the RLDP on sustainable travel matters. There is a clear role set out for the planning system to facilitate active travel, and the RLDP will need to consider the outputs and how the cultural shift towards prioritising active travel is undertaken e.g. through developments, planning policy, planning obligations etc.

Retail and the City Centre: SPI9, RI - RII

5.3.26 The existing LDP was informed by the Colliers Retail Study and Capacity Assessment, (2012), which evidenced the need to focus new retail and commercial developments in the identified retail hierarchy to assist in sustaining and enhancing the city centre, district and local centres and building sustainable communities. Since the adoption of the LDP the city centre has seen the completion of the Friars Walk development which has provided a greater retail and leisure focus to the city centre and this will be a key consideration for the Council within its review. In addition, the monitoring of the retail policies set out in the 5 AMRs has continually raised concern in particular with the primary and secondary shopping frontages, the level of vacancies, reduction in footfall numbers and pressure for out of town retail.

5.3.27 Work has already been undertaken by the Council to provide an up to date evidence base on this matter for development management purposes through the commissioning of the Nexus Retail and Leisure Study (2019). In addition, the Council has published its City Centre Masterplan and the economic growth strategy and addendum.

The updated retail and leisure study will help inform the Plan revision in terms of retail strategy, retail policies and LDP allocations. Further work will also be undertaken in response to the current challenges faced by the High Street to inform the merits or otherwise of how future LDP policy can respond most effectively.

Waste: SP20, WI, W2, W3

5.3.28 The Waste policies are generally considered to be functioning effectively and the SPG has been considered useful. The need to provide enough land for waste facilities, as required by PPW, will be considered as well as the need for any Council required facilities.

Minerals: SP21, M1, M2, M3, M4

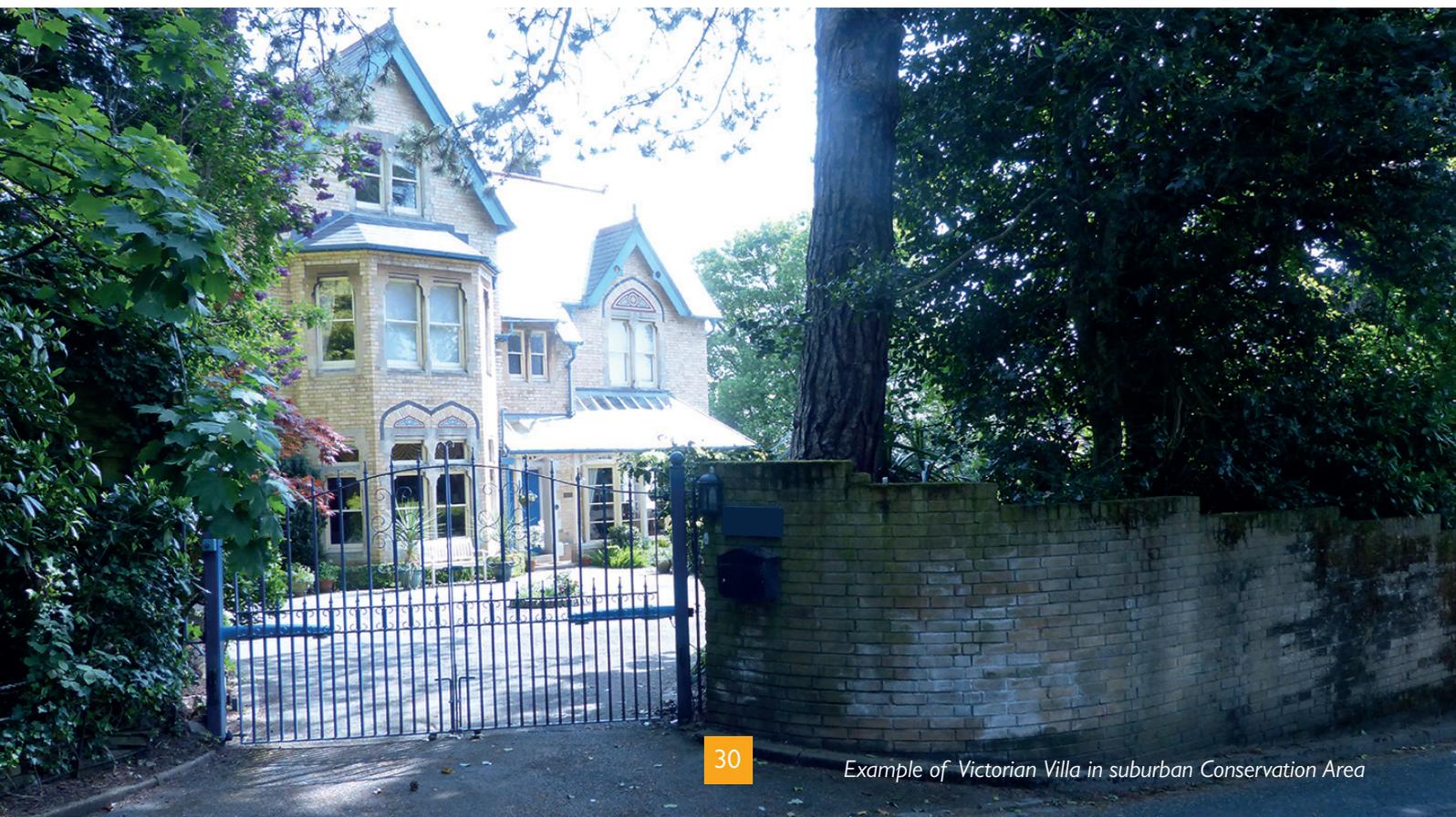
5.3.29 The Minerals policies were prepared in the context of PPW, MTANI and the Regional Technical Statement (RTS) of the South Wales Regional Aggregates Working Party (SWRAWP) (October 2008). A second ongoing Review of the RTS is currently being finalised and endorsement sought from each MPA. The review of the LDP will need to consider the implications of the recommendations in the second Review of the RTS along with any changes in current Government guidance. The monitoring of the Minerals policies set out in the AMRs show that the policies SP21, M1 and M2 have been constantly shown as "training required" any future LDP revision should consider if the policy wording is appropriately and workable.

Supplementary Planning Guidance

5.3.30 A number of supplementary planning guidance (SPG) documents to support key LDP policy areas have been approved by the Council since adoption of the plan. These are:

- Planning Obligations SPG
- Affordable Housing SPG
- Archaeology and Archaeologically Sensitive Areas SPG
- Wildlife and Development SPG

- House Extensions and Domestic Outbuildings SPG
 - New Dwellings SPG
 - Flat Conversions SPG
 - Waste Storage and Collection SPG
 - Parking Standards SPG
 - Housing in Multiple Occupation SPG
 - Sustainable Travel SPG
 - Mineral Safeguarding SPG
 - Outdoor Play Space Provision SPG
 - Trees, Woodland, Hedgerows and Development Sites SPG
 - Air Quality SPG
 - Security Measures for Shopfronts and Commercial Premises SPG
 - Caerleon Conservation Area Appraisal SPG
 - Stow Park Conservation Area Appraisal SPG
 - Clytha Conservation Area Appraisal SPG
 - The Shrubbery Conservation Area Appraisal SPG
- 5.3.31 A review of the existing SPG, including ones recently adopted, will be undertaken as part of the LDP Revision process where time allows. The need for additional SPG will also be a matter for the revised LDP process.
- Proposals Plan and Constraints Plan**
- 5.3.32 The form and content of the LDP Proposals Plan will require changes as part of the LDP Review to reflect any changes to the plan.
- 5.3.33 The LDP Constraints Plan contains designations that are not directly proposals of the LDP but are constraints to development created by legislation or other mechanisms outside of the LDP process such as Flood Risk Areas and SSSI's, etc. The printed Constraints Plan for the LDP represents a point in time and includes several designations particularly flood risk areas that have been updated since adoption of the LDP and therefore it is out of date. In addition to a printed plan the Constraints Plan, alongside the Proposals Plan, will be produced in an electronic form with public access that will allow for it to be updated, as necessary.



6. Future evidence base requirements

6.1 The contextual and evidence base changes that have occurred since the Plan's adoption in 2015, including updates to WG population and household projections, indicate that the RLDP will need to be revised to reflect such changes. Other elements of the LDP evidence base will also need to be updated as part of the plan preparation process, as detailed below. To inform the review of the LDP there will be a need to update various elements of the evidence base that informed the current Local Development Plan in order to fully understand the land use requirements of the city up to 2036. A sample of potential evidence base studies which may be required to inform the LDP include:

- Population and household forecasts
- Local Housing Needs Assessment
- Employment Land Review
- Affordable Housing Viability Assessment
- Gypsy and Traveller Accommodation Needs Assessment
- Strategic Flood Consequence Assessment
- Retail and Leisure Study
- Green Infrastructure Assessment
- Renewable Energy Assessment
- Landscape Assessment
- Aggregate Monitoring Surveys

6.2 This is not a definitive list and additional evidence base requirements may emerge as the plan revision progresses. Opportunities to undertake this work with other LPAs is discussed in Section 7.

■ Sustainability Appraisal including Strategic Environmental Assessment

6.3 A requirement of the LDP process is that Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) informs preparation of the LDP. The SA/SEA process is integral to the development of the LDP to ensure the policies in the LDP promote Sustainable Development through integration of the key economic, environmental, social and cultural objectives in the development of the LDP policies and proposals and take account of any significant effects on the environment. The SA/SEA has been an iterative process throughout preparation of the LDP and policies and proposals in the LDP reflect this.

6.4 A monitoring of the Sustainability Appraisal Objectives is undertaken on an annual basis and reported through the LDP Annual Monitoring Report. This enables the Council to assess the extent to which the LDP is contributing to the achievement of sustainable development and to identify any concerns. To inform the review of the LDP, it will be necessary to revisit and update the environmental, social and economic baseline information, along with the review of relevant plans policies and programme. The SA Monitoring Framework including the SA Objectives will need to be reviewed to ensure this remains up to date, and this will include considering whether the methodologies need revising due to changes in legislation.

6.5 An Integrated Sustainability Appraisal⁶, (SA) incorporating Strategic Environmental Assessment⁷ (SEA) and Welsh Language Impact Assessment (LIA), is a statutory requirement of LDP preparation. The Council will undertake an Integrated Sustainability Appraisal (ISA) but shall broaden the scope of this integrated assessment to ensure that it also captures a few other impact assessments. This approach will assess the contribution the RLDP can make to the Well-Being Goals and ensures a collaborative approach on a variety of issues, recognising links between them and avoiding duplication of work. This holistic and integrated approach will ensure that as well as the SA, SEA and LIA (noted above) the integrated assessment will include as a minimum an Equalities Impact Assessment (EIA), Health Impact Assessment (HIA) and a clear understanding of how the Welsh well-being goals are influencing the plan. For future reference, the Integrated Sustainability Appraisal should be considered to include the

broader assessments as noted above. The ISA process will run concurrently with the plan making process and forms an iterative part of plan preparation.

■ Habitat regulations assessment

6.6 The LDP was informed by Habitats Regulations Assessment (HRA), the purpose of which is to assess the impacts of a land use plan, in combination with the effects of other plans and projects, against the conservation objectives of internationally important European sites of nature conservation importance such as Special Areas of Conservation, Special Protection Areas (designated for their ecological status) and RAMSAR and to ascertain following screening what needs Appropriate Assessment (AA). As part of the review of the LDP, the HRA will need to be reviewed.



Newport Wetlands Centre

⁶ Section 62 (6) Planning and Compulsory Purchase Act 2004

⁷ European Union Directive 2001/42/EC & Environmental Assessment of Plans and Programmes (Wales) Regulations 2004

7. Options for review

7.1 A key outcome of the final Review Report is to make a recommendation on the type of revision process to be followed, based on the evidence contained in the report. This can either be a short form or full revision. This Review Report forms a discussion document to seek the views of stakeholders on the best way to proceed. A conclusion on the form of review is set out in section 8.

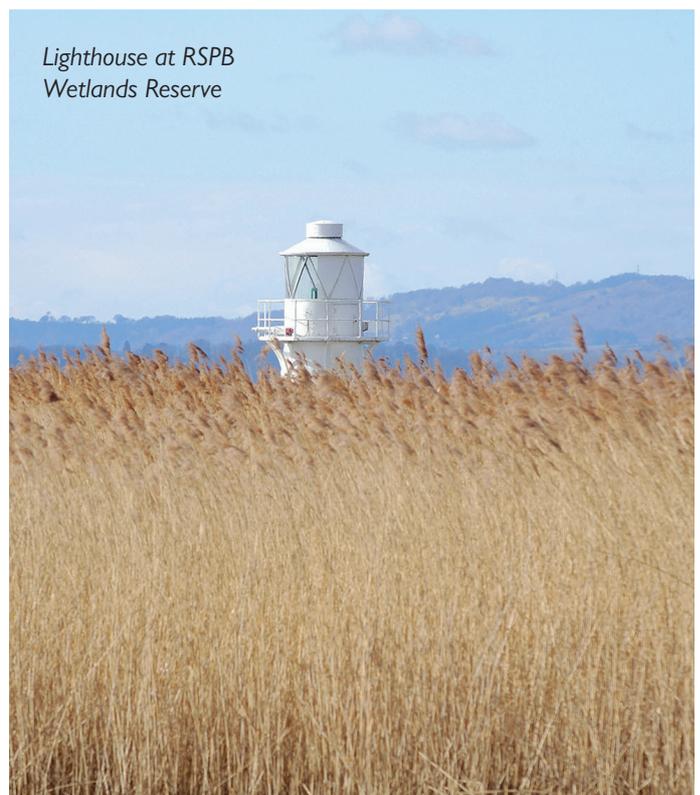
■ Joint LDPs and joint working

7.2 In line with the development plan manual, consideration must be given to the scope for preparing a Joint LDP with another LPA. It is noted that out of the 10 authorities in South East Wales, there are no examples of a joint LDP being undertaken. There are however many examples of joint working within the region. Of the 10 authorities only Cardiff and Caerphilly, as neighbouring authorities, have a similar timescale for the preparation of a replacement plan. On reflection, it is considered that the preparation of a joint plan is not appropriate due to the lack of synergy on key aspects of plan preparation. Each authority has unique factors to consider within their own plan that would not benefit from a strict joint approach, e.g. Newport's identification in the 'Future Wales: The National Plan 2040' (NDF) as a national area of growth.

7.3 Nonetheless, there are clear opportunities for joint working within the region. Where opportunities have arisen, Newport has taken the opportunity to commission work with

neighbouring authorities e.g. Renewable Energy and Employment studies. This will continue throughout the plan development whenever possible. There is an existing collaborative relationship across the South East Wales region which will be utilised to ensure that we maximise efficiencies and consistency where appropriate and cross-boundary matters are adequately addressed.

7.4 It is therefore considered that the most appropriate way forward is to respond to local issues and maintain plan coverage and wherever possible produce and share a joint evidence base.

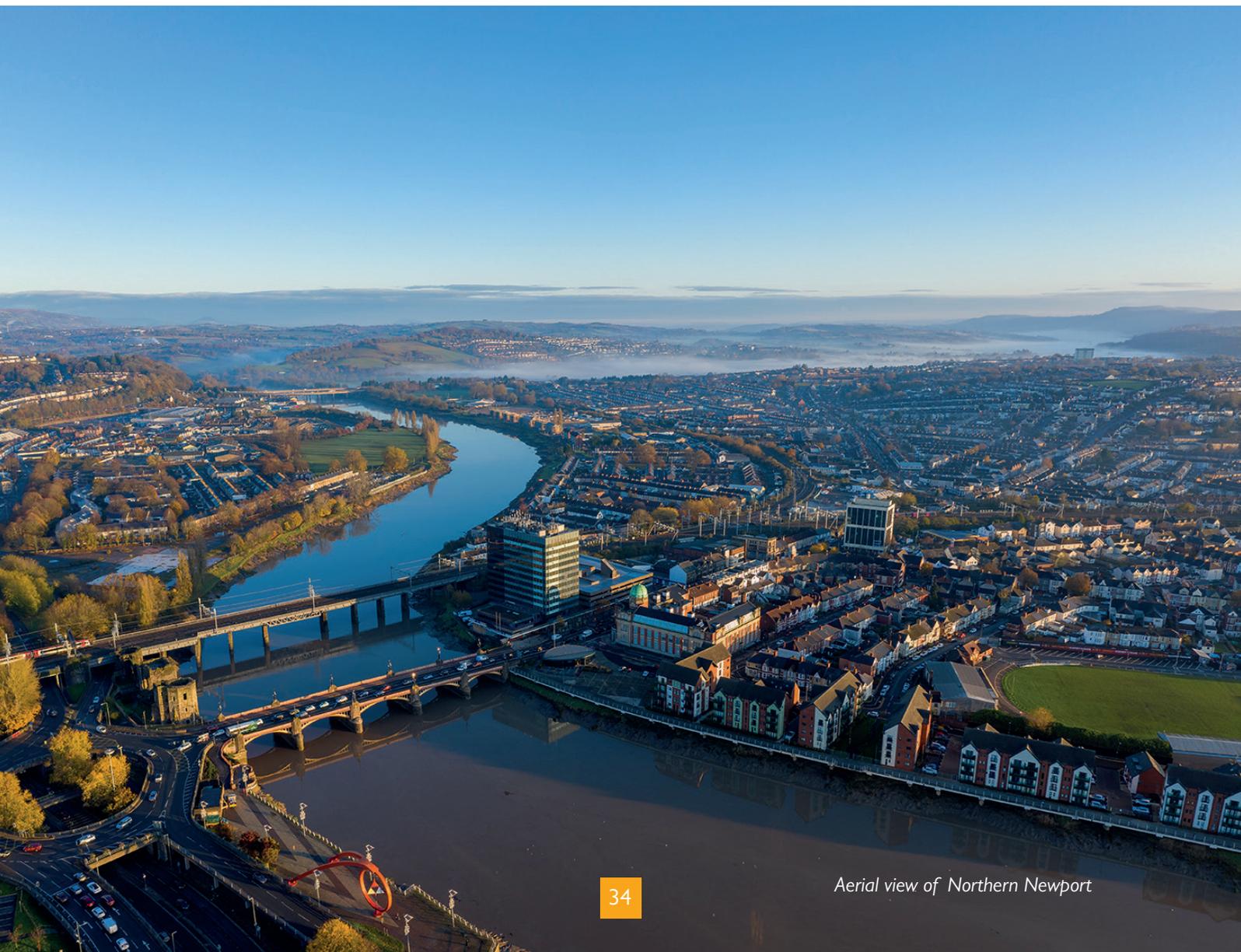


8. Conclusions and the next steps

Recommendation

8.1 In terms of the procedural route for revision of the Newport LDP, it should be noted that the plan is already subject to the statutory 4-year full review, and as such, all aspects of the plan will need to be assessed to consider

if they remain sound and fit for purpose. It is considered, irrespective of the deadline for review set by legislation, that based on this report, the most appropriate form of review is the Full Revision Procedure and a Replacement LDP is prepared for the period 2021-2036.



9. Glossary

| | |
|--------|--|
| AAR | Average Annual Requirement |
| AMR | Annual Monitoring Report |
| AVHA | Affordable Housing Viability Assessment |
| CCR | Cardiff Capital Region |
| CIS | Community Involvement Scheme |
| DA | Delivery Agreement |
| FW | Future Wales: The National Plan 2040 |
| GTAA | Gypsy and Traveller Accommodation Assessment |
| HRA | Habitat Regulations Assessment |
| JHLAS | Joint Housing Land Availability Study |
| LDP | Local Development Plan |
| MPA | Mineral Planning Authority |
| MTAN | Mineral Technical Advice Note |
| MYE | Mid-Year Population Estimates (supplied by Office for National Statistics) |
| NDF | National Development Framework |
| ONS | Office for National Statistics |
| PCPA | Planning and Compulsory Purchase Act |
| PPW | Planning Policy Wales |
| PSB | Public Service Board |
| RLDP | Replacement Local Development Plan |
| SA | Sustainability Appraisal |
| SAC | Special Area for Conservation |
| SEA | Strategic Environmental Assessment |
| SEWSPG | South East Wales Strategic Planning Group |
| SINC | Site of Importance for Nature Conservation |
| TAN | Technical Advice Note |

Appendix I:

LDP Allocation review

AI.1 The following tables summarises the progress made with regards to the delivery of allocations listed within the LDP. This includes Housing, Gypsy and Traveller Accommodation, Employment Land and Education Allocations

PROGRESS MADE ON LDP HOUSING ALLOCATIONS

| LDP Reference | Units to deliver within LDP | Units complete | % complete | Progress Update |
|---|-----------------------------|----------------|------------|---|
| HI(1) McReadys, Ponthir Rd | 54 | 56 | 100% | Site complete. |
| HI(3) Llanwern Village | 1100 | 31 | 3% | Developer on site progressing |
| HI(4) Pirelli | 250 | 221 | 100% | Site complete. |
| HI(5) Glebelands | 153 (Now 215) | 58 | 27% | Developer on site progressing |
| HI(7) Bethesda Close | 22 | 22 | 100% | Site complete. |
| HI(8) The Severn Stiles | 23 | 0 | 0% | Developer interest in the site. |
| HI(9) Frobisher Road | 16 | 16 | 100% | Site complete. |
| HI(10) Pencoed Castle | 12 | 0 | 0% | Access road has been implemented. |
| HI(11) Laburnum Drive | 20 | 20 | 100% | Site complete. |
| HI(12) Former Tredegar Park Golf Course | 150 | 119 | 79% | Developer on site progressing |
| HI(13) Allt-Yr-Yn Campus | 125 | 125 | 100% | Site complete. |
| HI(14) Monmouthshire Bank Sidings | 517 | 517 | 100% | Site complete. |
| HI(15) Victoria Wharf, Old Town Dock | 130 | 0 | 0% | Planning permission (16/0789) granted 21/09/2017 for 93 units with a 3 year time period for implementation. |
| HI(16) Penmaen Wharf | 160 | 0 | 0% | Planning permission has lapsed. The site is within Flood Risk Zone C2. |

| | | | | |
|--------------------------------------|--------------|-----|------|--|
| HI(17) Former Hurrans Garden Centre | 60 | 60 | 100% | Site complete. |
| HI(19) Land at Hartridge High School | 65 | 0 | 0% | The site is linked to the development of the Jigsaw site. |
| HI(21) Former Floors 2 Go | 10 | 0 | 0% | No planning permission in place. No completions expected within the next 5 years. |
| HI(23) Traston Lane | 21 | 0 | 0% | Planning permission for a revised scheme was granted in late 2012. Limited progress made. |
| HI (24) 30-33 High Street | 16 | 16 | 100% | Site complete. |
| HI(25) Taylors Garage | 71 | 71 | 100% | Site complete. |
| HI(26) Ty Du Works | 26 | 26 | 100% | Site complete. |
| HI(30) Rear of South Wales Argus | 89 | 89 | 100% | Site complete. |
| HI(31) Roman Lodge Hotel | 10 | 0 | 0% | Owner is concentrating on the hotel use. Residential development not anticipated within the next 5 years. |
| HI(32) Former Sainsbury's | 140 | 0 | 09% | Mixed use proposal for 140 residential units; student accommodation; hotel and commercial. Outline planning permission approved 20/04/2016. The outline permission is very detailed with not many outstanding issues to be approved via reserved matters. Demolition and construction of a flood defence bund in conjunction with NRW is now complete, however very little progress has been made since. |
| HI(34) Bankside Coverack Road | 38 Now 76 | 0 | 0% | Revised scheme for 76 apartments approved subject to the signed of a S106 – ref: 18/1169. |
| HI(36) Farmwood Close | 10 | 0 | 0% | Extant planning permission which has been implemented by the commencement of 10 units. No known intent for the site. |
| HI(37) City Vizion | 338 | 338 | 100% | Site complete. |
| HI(38) Lysaghts Village (Orb Works) | 559 | 559 | 100% | Site complete. |

| | | | | |
|---|------|-----|------|---|
| HI(39) Former Bettws Comprehensive | 224 | 224 | 100% | Site complete. |
| HI(40) Westmark, Old Town Dock | 154 | 64 | 41% | Footings are in place for the remaining 90 units. There is no information as when the last block of flats will be completed. |
| HI(41) Trinity View | 16 | 15 | 94% | Long standing self-build development. Properties tend to be delivered at a rate of 1 house per annum. |
| HI(42) Black Clawson (Alexandra Gate) | 63 | 63 | 100% | Site complete. |
| HI(43) Portskewett Street (Liberty Grove) | 92 | 0 | 0% | Planning application 17/0038 for 92 flats granted 20/03/2018. |
| HI(44) Turner Street | 32 | 32 | 100% | Site complete. |
| HI(45) Lysaghts Parc | 100 | 0 | 0% | Remaining 100 units of a wider residential scheme. Linc Cymru are in the process of selling the land for development. |
| HI(47) Glan Llyn | 4000 | 780 | 20% | Developer on site progressing with two developers on site. |
| HI(51) Whitehead Works | 498 | 0 | 0% | Whitehead Development Company Ltd (subsidiary of Tai Tirion) set up to promote the site. Welsh Government has agreed a £7m commercial loan to WDC. Remediation works are complete on site. Resolution to approve the outline planning application has been agreed subject to the signing of a S106. (15/0775). 18/1039 – Phase 1 Reserved matters application approved 17/3/20. 471 Units (226 Tirion, 245 Lovell). |
| HI(52) Old Town Dock Remainder – East Dock Road | 288 | 45 | 16% | Site has progressed with 89 completions and a developer interest on remainder of the site |
| HI(53) Bideford Road | 35 | 0 | 0% | Completions not anticipated within the next 5 years. |
| HI(54) Jubilee Park Former Alcan Site | 934 | 830 | 89% | Developer on site progressing |
| HI(55) Jigsaw Site, Ringland | 200 | 0 | 0% | Site to be promoted for development alongside Hartridge High School site. |
| HI(56) Opposite Belmont Lodge | 122 | 0 | 0% | Permission is extant and owner has concentrated on the implementation of the ICC. Housing development not anticipated over the next year. |

| | | | | |
|---|-----|-----|------|---|
| HI (57) Treberth Crescent | 58 | 0 | 0% | Pobl scheme – 18/1231 for 45 older person homes approved. Expected to start on site in 2020. |
| HI (58) Panasonic | 250 | 250 | 100% | Site complete. |
| HI (59) 24 Crawford Road | 10 | 0 | 0% | 18/0255 - Partial discharge of condition relating to app 11/1258 for 21 flats. |
| HI (60) Parry Drive | 15 | 15 | 100% | Site complete. |
| HI (61) Former Postal Exchange, Mill Street | 70 | 0 | 0% | Residential no longer being pursued on the site – converted to new office building. |
| HI (62) Former Queens Hill School | 92 | 0 | 0% | 18/0507 – Hybrid application – outline for 96 units and full for some demolition works – approved 05/02/2019 20/0236 – Condition discharge - awaiting decision |
| HI (63) Telford Depot | 60 | 0 | 0% | NCC owned site. No progress. |
| HI (64) Uskside Paint Mills | 53 | 0 | 0% | Completions not anticipated during the next 5 years. |

PROGRESS MADE ON DELIVERY OF GYPSY/TRAVELLER ALLOCATION

| LDP Reference | Total Pitches | Pitches complete | % complete | Progress Update |
|--------------------------|---------------|------------------|------------|---|
| HI 6 Hartridge Farm Road | Up to 43 | 3 | 7% | A full planning application for 35 pitches on the Hartridge Farm Road site was approved in August 2016. Delivery will be phased to ensure the supply meets the demand. Three pitches have been fully completed, with the infrastructure in place for nine. |

PROGRESS MADE ON DELIVERY OF EMPLOYMENT LAND ALLOCATIONS

| LDP Reference | Use | Hectares developed | % complete | Progress Update |
|-----------------|---------------|--------------------|------------|---|
| EMI (i) Duffryn | B1, B2 and B8 | 0 | 0% | No progress has been made on this site. |

| | | | | |
|---|------------------------------|------|--------|--|
| EMI (ii) East of Queensway Meadows, South of Glan Llyn | B1, B2 and B8 | 0 | 0 | An application for a B8 Lorry Park and associated infrastructure (3.14ha) has been approved. |
| EMI (iii) Celtic Springs | B1 | 0 | 0 | An application for residential development on this land was resisted by the Council. No employment land proposals have come forward for this allocation to date. |
| EMI (iv) Solutia | B1, B2, B8 and leisure | 2.56 | 6.0% | Eastman (formally known as Solutia) is developing this site for development that directly benefits their chemicals business. A storage facility and heat and power plant has already been constructed and a Therminol Production plant was completed in 2016/17. (Therminol is a high temperature heat transfer fluid and is used in products such as solar panels). |
| EMI (v) Gwent Europark | B8 distribution | 0 | 0 | An outline planning permission for B8 distribution centres is in place for this allocation, but there have been no signs of any development progress in recent times. An application was approved in 2019 to allow B1 and B2 use at the site as well. |
| EMI (vi) Land off Chartist Drive | B1, B2 and B8 | 0 | 0 | No progress has been made on this site. |
| EMI (vii) Llanwern former steelworks, eastern end | B1, B2 and B8 | 7.97 | 22.5%% | Phase I of the Celtic Business Park has been completed. This was the first speculative employment scheme to be completed in Newport since before the recession. The CAF train factory (6ha of employment land) opened in late 2018. Additional phases of land also have permission but no |
| EMI (viii) Phoenix Park (former Pirelli works) Corporation Road | B1, B2 and ancillary use | 0 | 0 | No progress has been made on this site. |
| EMI (ix) Godfrey Road (Rear of Station) | Business and Commercial uses | 0 | 0 | No progress has been made on this site. |

PROGRESS MADE ON LDP HOUSING ALLOCATIONS

| LDP Reference | School | Progress Update |
|---|------------------|--|
| CF13 i) Former Whitehead Works, Cardiff Road | Primary School | Outline planning permission for a residential scheme along with a school has been granted, subject to signing of the S106 agreement. |
| CF13 ii) Jubilee Park (Former Alcan/Novelis Site) | Primary School | The school opened for the first day of term in September 2017. |
| CF13 iii) Glan Llyn | Primary School 1 | The school opened for the first day of term in September 2019 |
| CF13 iii) Glan Llyn | Primary School 2 | No plans to deliver the second primary school at Glan Llyn yet. |
| CF13 iv) Llanwern Village | Primary School | The residential development has now commenced. The school will be delivered at a later phase. |

Appendix 2:

LDP Policy review

A2.1 The following tables summarises the policy review assessment undertaken with specific Council departments and LDP users to ensure that as well as reflecting on the implementation of the policies as written any limitations or omissions are captured by those implementing the LDP.

A2.2 For each policy it should be assumed that amendments may be required to reflect contextual changes, evidence, updated legislation, and national policies and accommodate future changes to spatial strategy.

| Strategic Policies | | Commentary |
|--------------------|---|---|
| SP1 | Sustainability | Review necessary – to reflect the placemaking agenda and ensuring the policy does not duplicate other policy areas. |
| SP2 | Health | Review to consider Air Quality, and Dementia friendly topics as well as links between open spaces and physical and mental health. |
| SP3 | Flood Risk | Revision necessary – 4 of the past 5 years – issues have been highlight with monitoring target (MBI,MT3). The role of NRW and NCC needs clarifying this may be done through the new TAN 15. Impact of new flood maps and outcome of SFCA will influence future policy wording |
| SP4 | Water Resources | Functioning effectively |
| SP5 | Countryside | A review of both the Settlement and Village boundaries will take place to ensure it reflects the up to date position from 2015 and development allocation decisions. |
| SP6 | Green Belt | Functioning effectively. |
| SP7 | Green Wedges | A review of both the boundary of the Green Wedge will take place to ensure it reflects the up to date position from 2015 and development allocation decisions. |
| SP8 | Special Landscape Areas | Functioning effectively – SPG has not been provided to date review on whether this is still necessary. |
| SP9 | Conservation of the Natural, Historic and Built Environment | AMR highlighted as a concern where an outstanding objection remained in regard to the impact on a Listed Building. Further investigation as to the effectiveness of this policy and signposting to more up to date guidance, post Historic Environment Act. |
| SP10 | House Building Requirement | Revision necessary – revised level of housing growth over new plan period in relation to housing requirement and spatial strategy. |
| SP11 | Eastern Expansion Area | Revision necessary – is this allocation still necessary due to successful implementation of this policy. |

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| SPI2 | Community Facilities | Amendments required to considered what is defined as community facilities and where they are best located. There is a need to consider the purpose of the policy and what is trying to be achieved. |
| SPI3 | Planning Obligations | Functioning effectively – SPGs will be updated to reflect new requirements linked to viability work for new developments. |
| SPI4 | Transport Proposals | Amendments required to considered Active Travel and transport hierarchy, outcome of WG decision on M4 relief road, RLDP growth options and development allocation decisions. |
| SPI5 | Integrated Transport | Amendments required to considered Active travel and transport hierarchy. |
| SPI6 | Major Road Schemes | Amendments required to considered transport hierarchy, outcome of WG decision on M4 relief road, RLDP growth options and development allocation decisions. |
| SPI7 | Employment Land | Revision Necessary - to reflect RLDP growth options and to assess the long term impact of Covid and how the current shift to home working will impact on employment sites long term. |
| SPI8 | Urban Regeneration | Updates and amendments required to reflect successful delivery of regeneration schemes outlined in policy text, contextual changes, evidence, updated legislation and national policies and accommodate future changes to spatial strategy. |
| SPI9 | Assessment of Retail Need | Revision Necessary – the current plan was adopted prior to the Friars Walk redevelopment. The level of vacancies, reduction in footfall numbers and pressure for out of town retail remains a concern and a more flexible approach should be considered. |
| SP20 | Waste Management | Functioning effectively. |
| SP21 | Minerals | Revised to Reflect up to date Regional Technical Statement. |

| General Policies | | Commentary |
|------------------|--|---|
| GP1 | Climate Change | Revision necessary to reflect spatial strategy over the extended period. |
| GP2 | General Amenity | Functioning effectively. |
| GP3 | Service Infrastructure | Functioning effectively. |
| GP4 | Highways and Accessibility | Amendments required to considered Active Travel and transport hierarchy |
| GP5 | Natural Environment | Amendments to include signposting to enhancement requirements, Bee Friendly City status, outcome of HRA and ISA. Review the process of monitoring in planning decisions. |
| GP6 | Quality of Design | Amendments required to clearer define “Good Design,” and opportunity to stress the importance of place-making. |
| GP7 | Environmental Protection and Public Health | Revision necessary - to reflect and provide enhanced clarity on dealing with pollution matters e.g. noise, overheating and air quality matters. |

| Environment Policies | | Commentary |
|----------------------|---|---|
| CE1 | Routeways, Corridors and Gateways | Functioning effectively |
| CE2 | Waterfront Development | Functioning effectively. |
| CE3 | Environmental Spaces and Corridors | Functioning effectively. |
| | Heritage | Review the need to update in line with new legislation and link with the Newport Offer. |
| CE4 | Historic Landscapes, Parks, Gardens and Battlefields | Functioning effectively. |
| CE5 | Locally Listed Buildings and Sites | Review whether a local list is to be produced |
| CE6 | Archaeology | Functioning effectively |
| CE7 | Conservation Areas | Functioning effectively. |
| CE8 | Locally Designated Nature Conservation and Geological Sites | Functioning effectively. |
| CE9 | Coastal Zone | Amendments may be required to reflect impact from the National Marine Plan and monitoring requirements |
| CE10 | Renewable Energy | Revision necessary to reflect government and local targets, with the policy text updated to be more in line with national policy. |

| Housing Policies | | Commentary |
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| H1 | Housing Sites | Revision necessary – revised level of housing growth over new plan period in relation to housing requirement and spatial strategy. |
| H2 | Housing Standards | Review whether the policy can further reflect updates in design and lifetime development needs. |
| H3 | Housing Mix and Density | Revision necessary – to reflect on why the policy has not been met and whether the allocation of new development sites will require further clarification within this policy |
| H4 | Affordable Housing | Revision necessary – revised level of housing growth over new plan period in relation to housing requirement and spatial strategy. A review of site viability and previous success of commuted sum requirements. |
| H5 | Affordable Housing Exceptions | Revision necessary –required greater clarification on what is local need. |
| H6 | Sub-division of Curtilages, Infill and Backland Development | Functioning effectively |
| H7 | Annexes to Residential Dwellings | Functioning effectively |
| H8 | Self Contained Accommodation and Houses in Multiple Occupation | Revision Necessary – Whilst an additional SPG has been prepared, appeal decisions are not always supporting the Council's position so a review is considered timely. |
| H9 | Housing Estate Regeneration | Update in line with successful delivery of Alway, Ringland and Pillgwenny Regeneration schemes. Identify specific allocations if required. |

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| H10 | Conversions in the Countryside | Functioning effectively |
| H11 | Outbuildings and Extensions to Conversions | Functioning effectively |
| H12 | Replacement Dwellings in the Countryside | Functioning effectively |
| H13 | Extensions to Dwellings in the Countryside | Functioning effectively |
| H14 | Caravans | Functioning effectively |
| H15 | Gypsy and Traveller Transit Accommodation | Revision Necessary – to reflect updated needs assessment. |
| H16 | Gypsy and Traveller Residential Accommodation | Revision Necessary – to reflect updated needs assessment. |
| H17 | Gypsy and Traveller Accommodation Proposals | Functioning effectively |

| Employment Policies | | Commentary |
|---------------------|-------------------------------------|--|
| EM1 | Employment Land Allocations | Revision Necessary - to assess the long term impact of Covid and how the current shift to home working will impact on employment sites long term. What ancillary facility are appropriate in and employment site? |
| EM2 | Newport Docks | Functioning effectively |
| EM3 | Alternative uses of Employment Land | Revision Necessary - to reflect RLDP growth options and to assess the long-term impact of Covid and how the current shift to home working will impact on employment sites long term. What is defined as commercial leisure developments, clarification on what constitutes “marketing”, consider restricting COU of recently constructed employment sites. |

| Transport Policies | | Commentary |
|--------------------|--|---|
| | Transport Policies - General | Amendments required to considered Active Travel and transport hierarchy. |
| T1 | Railways | Functioning effectively |
| T2 | Heavy Commercial Vehicle Movements | Functioning effectively. |
| T3 | Road Hierarchy | Functioning effectively. |
| T4 | Parking | Revision required – to reflect national policy requirements, consider boundaries of parking zones and ULEV charging implications. |
| T5 | Walking and Cycling | Functioning effectively |
| T6 | Public Rights of Way Improvement | Functioning effectively |
| T7 | Public Rights of Way and New Development | Functioning effectively |
| T8 | All Wales Coast Path | Should this be combined with Policy T7? |

| Retailing and the City Centre Policies | | Commentary |
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| R1 | City Centre Schemes | Revision necessary - to assess the long term impact of Covid and how the current shift to home working will impact on employment sites long term. What ancillary facility are appropriate in and employment site? |
| R2 | Primary Shopping Frontage | |
| R3 | Non-Retail Uses in Secondary City Centre Shopping Areas | |
| R4 | Non-Retail Uses in Other City Centre Shopping Areas | |
| R5 | Café Quarter | |
| R6 | Retail Proposals in District Centres | A Health check on the centres will be required to highlight any concerns. Clarification as to the application of the needs and sequential test at the local scale is required, as well as reflecting whether the policies are meant for the urban area only. |
| R7 | Non-Retail Uses In District Centres | |
| R8 | Small Scale Retail Proposals | |
| R9 | Change of Use to Non-Retail Uses Inside Local Centres | |
| R10 | New Out of Centre Retail Sites | Revision necessary to all Out of Centre Retail Polices – The level of vacancies, reduction in footfall numbers and pressure for out of town retail remains a concern. Policies to be reviewed to ensure this pressure is managed, as necessary. |
| R11 | Development of Existing Out-of-Centre Retail Sites | |

| Community Facilities & Other Infrastructure Policies | | Commentary |
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| CF1 | Protection of Playing Fields, Land and Buildings Used for Leisure, Sport, Recreation and Play | Functioning effectively |
| CF2 | Outdoor Play Space Requirements | Revision of calculations required to reflect revised level of housing growth over new plan period in relation to housing requirement and spatial strategy. |
| CF3 | Water Based Recreation | Consider the need to assess/encourage requirements e.g. lifeboat and leisure access. |
| CF4 | Riverfront Access | Consider the need to assess/encourage requirements e.g. lifeboat and leisure access. |
| CF5 | Usk and Sirhowy Valley Walks | Update to ensure this covers the requirement of PROW strategy |
| CF6 | Allotments | Functioning effectively |
| CF7 | Horse Related Developments | Functioning effectively |
| CF8 | Tourism | Amendments required to consider what is defined as tourism, very permissive at present possible implications from temporary accommodation from housing stock. |
| CF9 | Celtic Manor | Is a specify policy still necessary, can this be incorporated into CF8? |
| CF10 | Commercial Leisure Developments | Amendments required to consider what is defined as commercial leisure developments |
| CF11 | Outdoor Leisure Developments | Functioning effectively |

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| CF12 | Protection of Existing Community Facilities | Amendments required to consider what is defined as community facilities and where they are best located or how they can be protected if a private business. |
| CF13 | School Sites | Functioning effectively |

| Minerals Policies | | Commentary |
|-------------------|----------------------------------|--|
| M1 | Safeguarding of Mineral Resource | Revision Necessary – AMR highlighted that further training is needed every year. Review whether category 2 minerals should be safeguarded. |
| M2 | Mineral Development | Functioning effectively |
| M3 | Oil and Gas | Question whether this policy goes beyond national policy |
| M4 | Wharves and Rail | Functioning effectively |

| Waste Policies | | Commentary |
|----------------|--|--|
| W1 | Sites for Waste Management Facilities | Review to ensure adequate land supply to meet requirements of PPW. |
| W2 | Waste Management Proposals | Review to ensure adequate land supply to meet local requirements. |
| W3 | Provision for Waste Management Facilities in Development | Functioning effectively |

Policy Topics noted as missing from the current plan:

- External space for Care Homes
- Guidance on lifetime homes and adaptation of homes strategy.