

Llywodraeth Cymru Welsh Government

Mark Hand Development Services Manager Newport City Council Civic Centre Newport NP20 4UR

Eich cyf : Your ref: Examination Ein cyf : Our ref: qa995981 Dyddiad : Date: 24 July 2014

Dear Mark,

Newport Local Development Plan - Consultation on Schedule of Matters Arising Changes (MAC) and revised Monitoring Framework (July 2014)

Thank you for your correspondence in relation to the consultation on the proposed MACs. We recognise your Authority's commitment to achieving a sound LDP and the amount of work by the forward planning team in reaching this stage. The matter of whether a plan is considered 'sound' will be for the appointed Planning Inspector to determine.

We have all ready submitted our comments on a range of topic areas throughout the examination process which have been published on the examination web site. We therefore have **no objections** to the proposed MACs under the tests of soundness and consider that the Council has addressed the majority of our concerns.

We have included below a small number of **comments** relating to clarity which may be of assistance to the Inspector at this late stage in considering suitable changes to improve the clarity and accuracy of the plan.

MAC- 2.9 (SP10 - House Building Requirement)

The reference to the 'affordable housing <u>requirement'</u> of 8,901 units should be removed from the policy. Reference to affordable housing need would be more appropriately contained within the reasoned justification as this figure is likely to change regularly, based on the need identified within the Local Housing Market Assessment. The affordable housing <u>'target'</u> should remain within the policy.



Appendix 2 – Revised H1 Policy

The revised table shows that 9,855 homes are either completed, under construction or remaining in the plan period. The corresponding H1 sites table states that this figure is 10,597 homes. It appears that the affordable housing units have been duplicated in this figure? The affordable housing figures are included within the 9,855, not in addition to this. The authority need to ensure that H1 table aligns totally with the summary table in order to provide clarity when reading the plan.

Revised Monitoring Framework – Appendix 5 (OB4 – MT7)

We support the thrust of what this policy is trying to achieve, however we feel the indicator would benefit from further clarity.

For example, from what 'baseline position' will the Council use to determine whether the residual land values have increased or decreased by 5% in the various sub market areas. What costs have been factored into this baseline equation? Where/is this information currently available? It would be helpful if the Council would explain how it intends to monitor this indicator make the appropriate amendments.

MAC 2.22 - Policy SP22 Minerals

For clarity and consistency with national policy, we suggest that paragraph 2.88 is amended as follows:

"There is no current landbank in Newport and resources are limited. National Planning Policy requires local authorities to maintain a landbank to meet demand where there is an insufficient landbank of permitted reserves to meet the identified demand. ensure levels of supply are sufficient to meet anticipated demand.

The Inspector's Matters Arising note following the Minerals hearing session stated that the rail sidings referenced in policy M4 should be clearly denoted on the proposals plan. The rail sidings at Newport Docks are listed as being safeguarded. The policy should also safeguard Monmouthshire Bank sidings. The authority's Minerals Background Paper (paragraph 3.6) states that "the rail sidings at Mon Bank should be safeguarded to maintain existing and potential use for the transportation of aggregates by rail." The RTS First Review also refers to safeguarding rail sidings at Monmouthshire Bank.

Yours sincerely

Candice Coombs Planning Manager Planning Division Department for Housing and Regeneration