

Newport City Council LDP Reg 15 Pre-Deposit Consultation: Welsh Assembly Government Response

We note that a **SELF-ASSESSMENT** based on the soundness tests has been **PROVIDED** at Preferred Strategy stage (at Appendix B of the preferred Strategy doc; LDP Manual 6.5.1)

P1 - Prepared in accordance with the Delivery Agreement including the CIS

<u>Comments</u>	<u>Suggested Actions</u>
<p>We assume that the Preferred Strategy has been prepared in accordance with the Delivery Agreement. Please advise if this is not the case – the self-assessment doesn't indicate any discrepancies other than the need to revise the plan preparation timetable (Appendix B).</p> <p>PS stresses throughout the role of earlier consultations in defining the plan vision, objectives and options.</p>	----

P2 - Subjected to Sustainability Appraisal including Strategic Environmental Assessment (and Habitats Directive Appropriate Assessment)

<u>Comments</u>	<u>Suggested Actions</u>
<p>SA/SEA: We note that:</p> <ul style="list-style-type: none"> - The Preferred Strategy has been subject to SA/SEA: supporting documentation (Atkins) '<i>Sustainability Appraisal/ SEA Initial Report</i>' (Jan2010) (ISAR) – includes the environmental report - subject of current consultation. (+ <i>SA/SEA Scoping Report Nov08</i>). Strategic objectives, options and policies have been assessed. <p>Habitats Appropriate Assessment - Habitats Regulations Appraisal (HRA): We note that:</p> <ul style="list-style-type: none"> - the Preferred Strategy has been subject to HRA screening: supporting documentation (Atkins) the <i>HRA Initial Screening Report for the Preferred Strategy (Jan2010)</i> -subject of current consultation. <p>There is a number of nature conservation sites designated, or proposed to be designated, which require the highest level of protection. Newport has a number of European protected sites including the River Usk Special Area of Conservation (SAC), the Severn Estuary SAC, Special Protection Area and RAMSAR site.</p>	<p>It is vital that the authority is able to demonstrate that it has followed the correct procedure outlined in the SEA Regulations, the Habitats Regulations, has had regard to European Protected Species and that the deposit plan has had regard to the findings.</p> <p>Correct reference should be made to the Wales SEA Regulations and to the Habitats Regulations which transpose the requirements of the SEA Directive and the Habitats Directive respectively</p>

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C1 It is a land use plan which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.

<u>Comments</u>	<u>Suggested Actions</u>
<p>We note that the preferred strategy provide reference to the national, regional and local context for the LDP and refers to a number of the key relevant plans, policies and strategies:</p> <p>National: one reference to the WSP (Para 2.69) and South East Wales region (para 2.69) but no discussion of the implications</p> <p>Regional: references made to collaborative and cross- border working (South East Wales Regional Planning Group, South East Wales Transport Alliance and South Wales Regional Aggregates Working Party)</p> <p>Local:</p> <p>The SA/SEA Scoping Report (Nov08) sets out a more full review of relevant plans and policies at all levels including international / European.</p> <p>Relationships: Limited reference is made to collaborative & cross border working; references made to South East Wales Regional Planning Group, South East Wales Transport Alliance and South Wales Regional Aggregates Working Party.</p> <p>The authority should look at the emerging development plans of neighbouring authorities and explain their implications for any significant cross border issues. The neighbouring authorities' preferred strategies could have an impact on the role and function of the authority and influence the strategy. It is important the authority provides evidence of collaborative working for example on housing, infrastructure, utilities e.g. recorded meeting notes, to ensure a robust evidence base. The submitted LDP will need to have regard to any joint working for housing provision</p>	<p>Ensure that contextual strategies have collectively influenced the strategy, and that it made clear how they have done so. This includes emerging strategies of key neighbouring LPAs.</p> <p>Coordinate cross border designations and approaches.</p> <p>Provide clarification of any regional issues (e.g. flooding, infrastructure, utilities).</p> <p>Consider the impact of neighbouring authorities' development plan issues and strategies and how these will impact the future role and function of the authority and influence the strategy.</p> <p>Ensure adequate collaborative working, and provide evidence of it e.g. recorded meeting notes, to ensure a robust evidence base.</p>

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C2 It has regard to national policy.	
Comments	Suggested Actions
<p>LDP Wales (and PPW Companion Guide) makes clear that though LDPs must have regard to national policies, they should not repeat them, but rather explain how they apply to the local area. The draft strategic policies in the preferred strategy document should be the key delivery mechanisms for areas of change in the preferred spatial strategy (LDP Manual paragraph 6.5.1).</p> <p><i>N.B. Comments in relation to national policy are included under soundness tests CE1 & CE2</i></p>	<p>Review, refine or supplement the strategy and deposit plan proposals to implement national policy where appropriate. The deposit plan should have a clear statement on the application of national policy; it should also incorporate a form of notation that makes clear when national policy will apply.</p> <p>See comments under soundness tests CE1 & CE2</p>
C3 It has regard to the Wales Spatial Plan	
Comments	Suggested Actions
<p>The LDP strategy is considered to have had regard to the Wales Spatial Plan. (only one reference in para 2.69)</p> <p>It is unclear how the Preferred Strategy has been chosen from the Spatial Options considered. There is also an unclear link between the options and Preferred Strategy.</p> <p>Integration of, and complementarities between, emerging LDPs within the appropriate spatial plan areas is crucial to ensure that, taken together, the plans will help realise the WSP vision and objectives.</p>	<p>Ensure there is regional complementarity between emerging LDPs.</p> <p>In terms of the future roles and functions of settlements, the role of ongoing WSP work (e.g. the Settlement Complementarity Study) should be identified in the deposit plan and evidence base.</p>
C4 - Has regard to the relevant community strategy/ies.	
Comments	Suggested Actions
<p>The Preferred Strategy has not identified the Community Strategy, 'Building for our Future Together' 2005-2015.</p> <p>The self-assessment soundness test says that the LDP Preferred Strategy has had regard to, and seeks to implement, the Community Strategy.</p>	<p>Ensure evidence base clarifies whether a review of the emerging strategy is necessitated by the current review of the Community Strategy</p>

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<p>CE1 The plan sets out coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities</p> <p>&</p> <p>CE2 The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives, and/or are founded on a robust and credible evidence base</p>	
Comments	Suggested Actions
The Preferred Strategy documentation should make clear what the key issues are that the LDP will address, what the plan vision is, what the plan objectives are, what strategic spatial options were considered and what the preferred spatial strategy is (see LDP Manual section 6.5). These are identified in the Preferred Strategy document at chapters 1 and 2.	----
The summary of the Preferred Strategy document provides a useful insight into the approach taken to addressing the key issues that need to be addressed through the LDP process.	
<p>Issues are identified in Chapter 2, but are not addressed in a clear way, as they are combined with 'trends, issues, options and preferred options'. This section could be sub-divided for clarification purposes. There is limited information regarding the key issues which have informed the objectives.</p> <p>Many different topics are discussed, but no key topics are identified. It is critical that the issues developed are transparent and evidence-based. It may be of benefit to clarify the key questions that the strategy needs to address. It would benefit the focus of the LDP strategy and deposit plan if a small number of critical land-use issues were clearly identified which the LDP will aim to address and to deliver on.</p>	<p>Review the issues to identify the key critical land-use issues which the LDP will aim to address and to deliver on. Ensure it is clear what the key questions are that the strategy needs to address, the required action by the LDP, and consequently, the monitoring framework.</p>

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<p>The LDP vision is very generic and lacks a spatial dimension as it could be applied to many other authorities in Wales.</p> <p>This integral vision is essential to ensure it is locally distinct with a spatial dimension and relevant to land use planning. A vision specifically for the LDP is welcomed, rather than simply adopting the generic Community Strategy Mission Statement.</p>	
<p>8 Strategic Objectives are identified in Chapter 2. The Strategic Objectives are largely generic and lack local distinctiveness, and each objective shows no evidence of a 'spatial commentary' which could include reference to issues being addressed, how it will be achieved / delivered, timescale & monitoring.</p> <p>There is little context provided for the objectives, save for the brief vision. The objectives would benefit if they were related to a set of key issues / spatial portrait , therefore providing a local dimension. This section lacks any context with regard to the national, regional and local context , it is not clear how this document fits in with other strategies, plans etc.</p> <p>The strategic objectives should be based on local issues that can be measured in accordance with SMART principles, including details of the actions that need to be taken to achieve the vision with timescales where appropriate; this would make them easier to monitor and ensure the strategy is being delivered.</p>	<p>Consider developing into SMART locally distinct spatial objectives to aid clarity for monitoring; ensure that any links / inconsistencies / conflicts between objectives are identified and also identify any prioritisation that is required.</p>
<p>Section 2 on Trends, issues, options and preferred options is too broad a chapter and could be split into smaller sections for clarity, for example, identifying 'trends and issues', strategic development options and a Preferred Strategy are all important sections of the Pre-Deposit Preferred Strategy.</p> <p>The issues identified are not communicated in a clear way.</p> <p>Preferred strategy from strategic options:</p> <p>There are no Spatial Options that have been considered in the preferred strategy. There appears to be a presumption that a 'brownfield' option is the only available option and likewise with the level of growth.</p> <p>The approach in the LDP will be a Sustainable Development (Brownfield) strategy, the same as in the adopted UDP approach:-</p> <ul style="list-style-type: none"> ▪ Spread of Brownfield sites across the City e.g. Llanwern Steelworks (east); Whiteheads Steelworks & 	<p>Ensure that the selection of a preferred spatial option is clearly and firmly founded on robust evidence, and that the role of stakeholders in developing it is appropriate; and that it is clear in how it will achieve the plans objectives.</p> <p>Ensure adequate clarity on how the options selected are realistic options for meeting the plan objectives.</p> <p>Ensure that the spatial strategy is</p>

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<p>Monmouthshire Bank Sidings (south west); Old Town Dock (Riverfront south); Cindau (Riverfront north).</p> <ul style="list-style-type: none"> Focus on regeneration, building on the culture and heritage of the city, seeking to maximise the use of previously developed, Brownfield land. <p>It is not made clear how effective the UDP Brownfield strategy has been to date and whether there have been any changes in the main issues that it was intended to address; this would be an important contributory piece of evidence as to why it would be fit for purpose for the LDP.</p> <p>The LDP strategy needs to be adequately justified to avoid any assumption that it has been chosen purely because it was the identified strategy for the UDP.</p> <p>Growth potential (Para 2.28)</p> <p>A projection of population and household growth based on recent trends 640 dwellings per annum. This is in line with the Welsh Assembly's 2006 based household projections (613 dwellings per annum), but lower than the South East Wales Strategic Planning Group (SEWSPG) regional apportionment of 800 dwellings per annum. Whilst the level of growth is largely consistent with WAG projections, these should be a starting point and justified locally. There is a lack of justification for the growth level.</p> <p>The current UDP has a requirement of 740 dwellings per annum. (See Strategic Options background paper (March 2009)). The consideration of options is weak as there is no consideration of how the options fit with the vision, capacity issues, regeneration requirements, infrastructure, environmental constraints, delivery of affordable housing etc. It would be useful to know how the 640 dwellings per annum compares with recent build rates / completions.</p> <p>The 'sustainable development' preferred strategy (Ch2 & Key Diagram) proposes placing a strong emphasis on regeneration as being the most sustainable way to meet the development needs of the city. Whilst the key diagram identifies urban regeneration sites and key new employment areas, there is no explanation or justification for the selection of these sites in the supporting text.</p> <p>3 Strategic brownfield sites are identified (2.57) and 2 Strategic greenfield sites (2.65). These sites are not clearly shown on key diagram. The deposit plan should signify where Masterplans will be appropriate.</p> <p>Deliverability of the strategy – see comments at CE3 below.</p>	<p>suitably supported by the SA.</p> <p>Evidence the effectiveness of the UDP Brownfield strategy to date.</p> <p>Ensure preferred growth option is clear and supported by robust evidence clarifying the regional situation and linked to the issues and considerations specific to the plan area.</p> <p>Ensure that the preferred growth option can be delivered, is flexible to adapt to changing economic circumstances and is thoroughly evidenced. Clear evidence addressing linkages to the issues and any implications arising should also be presented.</p> <p>A detailed review of settlements must ensure the strategy is robustly evidenced and establish the level of growth that can be accommodated. The capacities for development within various settlements needs to be evidenced and clarified.</p> <p>Ensure that proposed strategic sites are appropriately reviewed. Consider Masterplan requirement. The deposit plan should be sufficiently flexible and provide contingencies should a strategic site prove undevelopable; it should at a minimum indicate the plan's priorities.</p>
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<p>Evidence – robust and credible:</p> <p><u>Background Studies / Evidence Base or Topic papers have not been supplied</u></p> <p>We would draw attention in particular to being clear about:</p> <ul style="list-style-type: none"> - any regional apportionment of housing - that the viability and delivery of affordable housing provision is demonstrated - the level of need for Gypsy Traveller accommodation - the location of sites vulnerable to flooding - minerals - waste - the issue of infrastructure constraints and required solutions 	<p>It is vital that an appropriate robust and credible evidence is available and its influence in developing and supporting the strategy is clear in the Deposit plan, including if studies arrive at differing conclusions from those that have formed the basis for the draft preferred strategy. It is important that there are suitable clearly referenced background papers to accompany the deposit plan.</p> <p>Ensure that policies are drafted to clearly reflect the local circumstances and evidence base.</p>
<p>Clarification of how the site assessment process (through the site assessment methodology) will work is not provided.</p>	<p>----</p>
<p>Implementation & Delivery; Flexibility; Monitoring – see comments at CE3 & CE4 below</p>	
<p>SPG - Reference is made (2.39) to the preparation of SPG for young people's housing, possible SPG on environmental performance of new housing (para 2.50) and SPG on the Community Infrastructure Levy (policy SP10). Information on the SPG programme should be provided in the Deposit plan.</p>	<p>Information on the SPG programme should be provided in the deposit plan.</p>
<p>Strategic Policies (ch.3) – 19 policies on a topic basis.</p> <p>A significant number of Strategic Policies appear vague and generic and as such fail to provide the local dimension for national planning policy or lack the required detail. There is a lack of relationship to the key issues and objectives for the area.</p>	<p>Reconsider the need to redraft strategic policies for greater relevance and local focus; add necessary detail from the emerging evidence base.</p>
<p>Agricultural land</p> <p>The strategy does not raise any issues relating to the operation of paragraph 2.8.1 of PPW. The parts of the strategy that demonstrate the above view are paragraphs 2.62 – 2.66 and policies SP1(1), SP8 and SP15 which clarify that development on a significant scale on greenfield sites, apart from exercising existing planning permissions, is not required during the plan period.</p>	<p>Ensure the deposit plan is based on an assessment of the agricultural land quality of development sites and directs development away from best and most versatile agricultural land.</p>

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<p>Gypsies & Travellers</p> <p>It is good to see that Gypsies and Travellers have been considered in Newport's Local Development Plan.</p> <p>Newport's County Council's LDP states that a "joint Gypsy and Traveller Accommodation Needs Study was completed in October 2009 and the conclusions on pitch numbers and recommended locations for sites will form the content of criteria based policies and/or allocations for this plan. Any site selection process will be carried out in consultation with both settled and Gypsy and Traveller citizens".</p> <p>We would like to know what Newport's intentions are as they have an identified need but appear to be unable to meet this need at this stage.</p> <p>What work is being done to locate a site to accommodate this additional need? Will Newport revise their LDP once a site has been identified?</p>	<p>Ensure that the required Accommodation Needs Assessment (ANA) for Gypsy and Travellers informs LDP preparation. The authority should provide suitable land to accommodate the identified need. Ensure appropriate site(s) are identified in the deposit plan (both permanent and transit) along with an appropriate criteria based policy.</p>
<p>Employment (SP7 & 7.12)</p> <p>Para 2.103 notes that large areas of employment land in public ownership are constrained by the uncertainty surrounding the new M4 and the Quinn Therm project.</p> <p>The future of the M4 is crucial –at Queensway Meadows it provides boundary definition, layout orientation. Without the new M4 it is unlikely to go ahead. In relation to west Newport it is important for layout orientation and general issues of certainty. There is no mention of Newport Unlimited.</p> <p>With regard to cross boundary issues reference should be made to adjacent authorities'. In this instance Monmouth in its Employment Study has explicitly referred to Newport as an employment provider for Monmouthshire.</p> <p>There appears to be limited information to justify the level of employment land. Despite an overprovision of employment land it is not clear how this affected the brownfield strategy. This also needs to be considered in light of the waste proposals to use B2 sites.</p> <p>Transport and Communications</p> <p>Para 2.94- Notes" New M4 is not included in the National Plan's consultation Draft"</p>	<p>The deposit plan and its evidence base should:</p> <ul style="list-style-type: none"> - clarify relationships with neighbour authority employment strategies / allocations; - identify any strategic employment sites; - be robust and realistic in terms of employment land allocations and their deliverability; - clarify the inter-relationship between housing and employment land allocations within the plan area and with neighbouring plan areas. <p>As the LDP acknowledges that the new M4 route will not come forward this should be deleted, and associated</p>

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<p>The route of proposed M4 is indicated on proposals map but not a policy.</p> <p>It is appreciated that the future decision on the M4 relief is not a matter that Newport can determine. It is however fundamental to the transportation and the employment strategies and subsequent detailed planning, promotion and deliverability.</p>	<p>allocations revisited and re-located</p>
<p>Historic Environment</p> <p>Cadw has not identified any national policy issues that have not been addressed in the plan in relation to the historic environment.</p> <p>The following general comments should improve the aspects of the plan that relate to the historic environment.</p> <p>p.5 Objective 5 The objective should read “To ensure that all development or use of land does not adversely affect, and seeks to preserve or enhance, the quality of the <i>historic and</i> built environment.”</p> <p>p.10 Heritage Paragraph 2.25 Cadw – Welsh Historic Monuments should be amended to <i>Cadw, the Welsh Assembly Government’s Historic Environment Service</i>.</p> <p>p.29 SP7 Conservation of the Natural and Built Environment This policy should be renamed Conservation of the Natural, <i>Historic</i> and Built Environment.</p> <p>Cadw also advises that Newport City Council should develop a special policy/ supplementary guidance covering development within Caerleon, where the concentration and very extensive areas of well-preserved Roman remains and the later medieval settlement are worthy of special consideration.</p> <p>In addition, the candidate site at Broadway Farm, Caerleon directly affects the following scheduled ancient monuments:</p> <ul style="list-style-type: none"> • Caerleon Civil Settlement (MM231) • Caerleon Amphitheatre (MM232) 	

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<ul style="list-style-type: none"> • Caerleon Leginnary Fortress (MM230) • Caerleon Civil Settlement: Area under playing fields (MM254) <p>Broadway Farm is not only within the scheduled ancient monument MM231 but is immediately adjacent to MM232, which is part of Cadw's estate. Any development on this candidate site would be contrary to the Welsh Assembly Government's Planning Policies on cultural heritage as set out in chapter 6 of Planning Policy Wales. Cadw cannot support the retention of this site in the emerging Local Development Plan. The proposal is also contrary to Objective 5 on page 5 of the Preferred Strategy.</p>	
<p>Housing</p> <p>In accordance with Ministerial Interim Planning Policy Statement 01/2006, <i>Housing</i>, the Preferred Strategy utilises the Assembly Government's 2006 based Population Projections.</p> <p>The Preferred Strategy proposes to provide 9,600 new housing units (640 p.a.) over the plan period 2011 – 2026. This is broadly in line with the Assembly Government's Household Projections for Newport, which indicate that 9,200 units are required (613 p.a.) over the 15 year period 2011 -2026. This figure is lower than the South East Wales Strategic Planning Group (SEWSPG) regional apportionment of 800 dwellings per annum. (See the Strategic Options background paper (March 2009)).</p> <p>The consideration of options is weak as there is no consideration of how the options fit with the vision, capacity issues regeneration requirements, infrastructure, environmental constraints, delivery of affordable housing etc. There is a lack of information on the deliverability of the housing figures. No information on past build rates is provided.</p> <p>Policy SP8 House Building Requirement Each phasing period of considered 'self-contained'. This may be significant in terms of the delivery of dwellings, for example if there is a shortfall of meeting targets in the first phase, then the whole plan will not meet its targets. It is not clear how the phasing is to be enforced. The phasing will benefit from a housing trajectory, clearly demonstrating deliverability.</p> <p>Affordable Housing (2.45)</p> <p>Affordable housing delivery is a Ministerial priority of the Welsh Assembly Government ("One Wales" commitment).</p>	<p>The deposit LDP should:</p> <ul style="list-style-type: none"> - provide robust housing figures which are adequately evidenced in accordance with national policy; - include a robust affordable housing target, supported by viability testing; - provide threshold(s) to deliver affordable housing and clarify the reasons for them with suitable viability studies; - evidence collaborative working with neighbouring LPAs in identifying housing requirements; - clarify the inter-relationship between housing and employment land allocations within the plan area and with neighbouring plan areas. - The deviation from the 2006 projections and apportionment agreement should be fully articulated, including any implications arising. - Clearly identify commitments and allocations. - Undertake economic viability testing,

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<p>No affordable housing policy has been included in the PS, but para 2.45 states that a target of 30% of units to be affordable is proposed to be a realistic maximum, although the authority's 2007 Local Housing Market Assessment (LHMA) revealed a need for 37% of housing to be affordable. There is no mention of this target being supported by viability testing, but the Council uses a Development Appraisal Toolkit to test the viability of schemes. The 2007 Local Market Assessment revealed a need for 37% of housing to be affordable (para 2.43). The target of 30% affordable housing to be provided is not translated into a numerical figure. There is no policy on affordable housing. Need to demonstrate that every effort is being made to close the gap between the affordable housing need and the level considered viable.</p> <p>A threshold of sites of over 10 dwellings or more to provide affordable housing. There is limited justification for this chosen threshold level.</p>	<p>including thresholds.</p> <ul style="list-style-type: none"> - Demonstrate how the large bank of commitments can deliver the affordable housing and infrastructure.
<p>Landscape and biodiversity (SP14 & 7.16)</p> <p>The LDP should be consistent with the Biodiversity Duty placed on all public bodies by the Natural Environment and Rural Communities Act 2006.</p> <p>Biodiversity</p> <p>2.17 Newport County Borough has a rich diversity of habitats and species of nature conservation importance and this is reflected in the presence of a wide range of local, national and international designations. The designated sites represent important environmental resources, and the Council has a duty to ensure that they are protected from inappropriate or damaging development, under the Natural Environment and Rural Communities Act (2006).</p> <p>However, much wider ranging effects of the Natural Environment & Rural Communities Act have not been identified. The implication here is that it only applies to designated sites rather than to all actions of the local authority that have an effect on biodiversity anywhere in the Borough.</p>	<p>Ensure adequate account is taken and the evidence base robust</p>
<p>Minerals (S10 & 7.17)</p> <p>We are pleased to see Newport's minerals strategy safeguards the sand and gravel resources as well as the wharves which support the area.</p> <p>There is doubt over Newport's ability to meet the need for aggregate minerals within the authority and comply with MPPW on ensuring supply and landbank provision. As minerals can only be worked where they occur, there may</p>	<p>The deposit plan should:</p> <ul style="list-style-type: none"> - adequately safeguard mineral resources in line with national policy and consistently across boundaries with neighbouring LPAs; - adequately provide for the

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<p>be a need to demonstrate agreements with neighbouring authorities to meet regional needs.</p> <p>The Cuesta Consulting study on the former Gwent area does identify the proximity of workings in neighbouring authorities and the environmental constraints that Newport faces but does not rule out land within the authority for preferred areas of search.</p>	<p>contribution to aggregates production over the plan period identified in the RTS;</p> <ul style="list-style-type: none"> - safeguard existing wharves; - be supported by robust background evidence.
<p>Renewable Energy</p> <p>National policy as contained in the Ministerial Interim Planning Policy Statement and TAN 8 encourages the use of renewable energy and requires local planning authorities to facilitate the development of all forms of renewable energy. The MIPPS states that local planning authorities should undertake an assessment of the potential of all renewable energy resource; renewable energy technologies, energy efficiency and conservation measure and include appropriate policies in LDPs.</p> <p>TAN8 provides targets not ceilings; work for the deposit plan should consider whether those target figures can be increased for the LDP.</p> <p>SP1 Sustainability contains very generic policy on renewable energy, and there is no evidence that the required assessment has been undertaken. Further consideration needs to be taken into securing benefits for Renewable Energy, Energy Efficiency and Conservation, particularly where large scale growth is envisaged.</p>	<p>Ensure that adequate consideration and assessment is evidenced; and that the deposit plan contains appropriate policy coverage.</p>
<p>Policy SP4 Countryside</p> <p>The phrase 'appropriate in the countryside' needs to be clarified.</p>	
<p>Retail</p> <p>The plan states that future investment should be concentrated in the city centre, rather than in out of town retailing.</p>	<p>The deposit plan and its evidence base should be suitably robust and clear</p>
<p>Sustainable Development</p> <p><u>Design</u></p> <p>The Preferred Strategy is not in accordance with MIPPS (01/2008) 'Planning for Good Design', as it does not set</p>	<p>Expand and / or consider as indicated for</p>

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<p>out in policies the design expectations for new development proposals. Further detail will be needed at the deposit stage to explain the implementation mechanisms to ensure these expectations are considered in the decision making process.</p> <p><u>Planning for Sustainable Buildings</u> There is no mention in the Preferred Strategy of Strategic Sites or the assessment of these sites. As a result, the preferred strategy is not in accordance with para2.12.15 which states LPAs should <i>assess the potential for strategic sites to meet higher sustainable building standards</i>.</p> <p>The accompanying 'Initial Sustainability Appraisal Report' mentions the assessment and development of Strategic Sites and it identifies 3 suitable sites. However, no reference is made to the policy outlined in MIPPS 01/2009.</p> <p>'Urban regeneration sites' are shown on the 'Preferred Strategy Map' on page 43 of the Preferred Strategy. It is not clear: whether these are the Strategic Sites or not; which sites they are as no description is given; or what opportunities there are on-site so to meet higher sustainable building standards.</p> <p>The preferred strategy lists 19 Strategic Policies including SP1 Sustainability. Point (iii) of SP1 relates to "<i>REDUCING ENERGY CONSUMPTION, INCREASING ENERGY EFFICIENCY AND ENCOURAGING THE USE OF LOW AND ZERO CARBON ENERGY SOURCES</i>". The policy is not linked to the requirement in MIPPS 01/2009 and no supporting text/evidence for the policy is provided.</p>	<p>deposit plan. Determine any policy requirement for local distinctiveness in design; also where Masterplans may be appropriate.</p>
<p>Waste (SP17, SP18)</p> <p>LDPs should identify sites for local and regional waste facilities or areas where such facilities may be suitable in line with PPW (12.5.4), and having regard to the requirements identified in the Regional Waste Plan. Para 2.105 of the PS recognises this.</p> <p>Policies and proposals should be based on evidence, including;</p> <ul style="list-style-type: none"> - why the sites have been chosen for the location of suitable waste facilities; and - the ability of the sites to accommodate site waste management facilities required to meet regional and local needs (e.g. suitability and availability). <p>Sites allocated for waste management in the LDP should be identified on the proposal map.</p> <p>Policies proposing any major new development should incorporate adequate and effective waste management facilities.</p>	<p>The deposit plan must:</p> <ul style="list-style-type: none"> - be supported by background evidence; - identify sites for local and regional waste facilities.

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<p>Water and flooding (SP2 & SP3)</p> <p>Newport will undertake a Strategic Flood Consequence Assessment (SFCA) to “Inform policy production and site selection” (para 2.7). This will bring together the extensive amount of information already held by the LPA. There is concern at what stage the SFCA will be completed, and how the preferred strategy has been formulated in its absence, as it will be needed before any policy or sites are considered for the LDP.</p> <p>Paragraph 2.8 indicates a willingness to address flood issues but there is no strategy indicating how Newport will do this.</p> <p>There is some contradiction in saying that ‘Development will be directed away from flood risk areas’ (para 2.8), but quoting recent developments on the riverfront which were in C1 and C2 areas.</p> <p>The PS advises that the Strategic Flood Consequences Assessment will be undertaken to collate and refine the extensive amount of existing information on flood risk within Newport to inform policy production and site selection (page 8); as this assessment should guide the strategy, the work would appear to be overdue.</p> <p>It is important that Deposit plan allocations and policies are in line with the TAN 15 and updated DAM maps and that sites in zones B and C are assessed in line with the requirements of TAN 15 to draw out any implications of this for the deposit LDP. Issues of surface water flooding should be addressed.</p> <p>Any water quality issues should also be addressed</p>	<p>Ensure that the strategy is informed by the SFCA and that flooding issues are suitably addressed in the deposit plan.</p>
<p>Water infrastructure</p> <p>National planning policy states that spatial choices should be based on, and influenced by, evidence of capacity and ability for delivery. If the provision of water/sewerage infrastructure is required, the measures needed and where, how and when they could be secured should be identified in the deposit plan. It would be useful to consider: current capacity, implications of public investment programmes, co-ordination of any improvement works, the need for phasing, and any other relevant delivery issues. Although it is unnecessary to reiterate national policy, the local implications of how infrastructure capacity and provision impact on the preferred strategy and its delivery should be clearly outlined.</p> <p>Early engagement with Dwr Cymru will provide useful information on the deliverability of development in terms of infrastructure provision.</p>	<p>Ensure that water / sewerage infrastructure implications for the plan's strategy and allocations are suitably addressed in the deposit plan.</p>

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It is not clear why the second sentence of policy SP2 'Flood Risk' achieves much more than national guidance.	
<p>Welsh Language</p> <p>PPW paragraph 2.10.2 states that local planning authorities should consider whether they have communities where the Welsh language is part of the social fabric.</p> <p>The Plan gives consideration to local provision of Welsh Medium Schools.</p>	Ensure that adequate consideration and assessment is evidenced; and that the deposit plan contains appropriate policy coverage.

CE 3 There are clear mechanisms for implementation and monitoring	
Comments	Suggested Actions
<p>Implementation and Delivery</p> <p>Information on implementation and delivery in the deposit plan is critical.</p> <p>The deliverability of the preferred 'brownfield' strategy needs to be addressed in the Preferred Strategy</p> <p>When developing the deposit plan, more consideration should be given to this matter, with clarification of what infrastructure is critical to the delivery of the strategy (versus what is desirable), and how it will be delivered, including timescales for implementation, and impacts on the delivery of affordable housing should also be fully explored. There is an indication that flooding issues, sewerage infrastructure and other constraints are significant issues, and it is not entirely clear that these have yet been fully explored; these may prejudice the delivery of the spatial growth strategy in certain areas and affect the soundness of the plan. Section 106 priorities should be made clear.</p> <p>A monitoring framework (2.116) sets out a list of topics around which key indicators will be drafted. A developed monitoring framework should consider plan objectives, strategic and relevant non-strategic policies together with principal implementation routes, responsibility for implementation (including stakeholder involvement), timescale, resource implications, targets (along with directions of travel and milestones), phasing and indicators. Contingencies and triggers for review should also be considered. Ensure that WAG core indicators are included.</p>	<p>Ensure that the key elements of the strategy can be delivered, and that proposed timescales for this delivery are provided. Funding streams, key delivery agents, and infrastructure requirements will need to be identified at an early stage.</p> <p>Section 106 priorities must be made clear.</p> <p>Ensure the monitoring and implementation framework will be satisfactory for measuring the effectiveness of the plan strategy and policies, and that WAG core indicators are included. (and see LDP Manual paragraph 9.5)</p>

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<p>A small section on the proposed Monitoring Framework is included at the end of section 2. This would be better placed at the end of the document.</p> <p>SP1 Sustainability No mechanisms or indicators are proposed for monitoring or implementing SP1.</p>	
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CE 4 It is reasonably flexible to enable it to deal with changing circumstances	
<u>Comments</u>	<u>Suggested Actions</u>
<p>The deposit LDP should be sufficiently flexible to enable it to deal with changing circumstances (such as a key site not coming forward for development), and identify any contingencies that might be in place, or what would trigger a review of the Plan.</p> <p>It is unclear whether the policies proposed will facilitate the delivery of future zero carbon standards in the authority area.</p>	<p>Ensure the strategy and deposit plan is sufficiently flexible to respond to changes in the economy, housing market assessment, key site take up and other changes.</p>