Consultation Report

Appendix 15 - Report of Representations on Revised Deposit Plan

December 2013
Policy SP8 identifies 7 SLAs within Newport, including 3 adjoining the Monmouthshire boundary – River Usk, Caldicot Levels and Wentwood. Generally support this policy approach to landscape protection through SLA designation.

Although the Monmouthshire LDP proposes a policy approach to landscape protection and management based on landscape characterisation, as defined by LANDMAP landscape character areas, it is considered that a consistent approach to landscape protection and management of adjoining landscape character areas should be achievable, given that both LPAs have used LANDMAP as a basis for landscape assessment.

Support noted. The method of assessment across Monmouthshire, Newport and Cardiff provides a robust evidence base and a consistent approach.
**Item Question**  
Representation Text

11  
Policy SP10 House Building Requirement

Policy SP10 sets out Newport’s house building requirements over the plan period.

It is noted that the Plan is deviating from the Welsh Government 2008 based projections, with the recommended housing requirement based on both demographic and economic led scenarios. Policy SP10 sets out a housing requirement of 10,350 units (690 p.a.) over the plan period 2011-2026, with provision made for 11,622 units (i.e. 12% flexibility allowance). This is higher than the target set out in both the Deposit LDP and the Preferred Strategy (583 p.a. and 640 p.a. respectively). While there is concern over the general principle of the methodology used to establish this target, this does not directly impact on Monmouthshire particularly as the higher growth target is welcomed in that it should contribute more positively to wider regional needs and to meeting Newport’s affordable housing requirements. It is noted that the target is lower than the SEWSPG regionally apportioned figure of 800 units p.a.

Support the policy’s intention to focus development within existing built up areas which is reflective of the Plan’s brownfield strategy.

**Item Question**  
Council Responses

13  
Council Response

Noted. The housing need and build rates are considered to fully reflect the most up to date evidence and the Council’s growth strategy.
Document: Revised LDP, p.25
Policy: SP11
Summary: Traffic Impact Assessment required for the Eastern Expansion Area

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**Representation Details**

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**Item Question**  
**Representation Text**

11  
**Representation**

Policy SP11 Eastern Expansion Area

Policy SP11 identifies land to the east of the City, centred on the redundant part of Llanwern Steelworks, as a mixed use sustainable urban expansion area, providing for housing, employment land and community uses. Given the proximity of this area to the western boundary of Monmouthshire at Magor/Undy, it is considered that the continued focus on the former steelworks for residential and employment development is likely to bring benefits of an expanding residential market and additional employment prospects for the sub-region.

The traffic generated by the proposed new development could have consequences for the M4 junction at Magor and possibly on the wider road network. A TIA will should therefore be undertaken and should include that part of the highway network from the County boundary to Junction 23A of the M4 motorway, including the partial cloverleaf interchange with the B4245.

---

**Item Question**  
**Council Responses**

13  
**Council Response**

Noted. A Transport Assessment was submitted as part of the Glan Llyn development supporting the outline planning application. The application has been approved and implemented. Monmouthshire County Council was consulted on this application.

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### Representation Details

**Rep'n/Para/Policy:** L4\//SP16  
**Representor:** Monmouthshire County Council  
**Accession No:** 07/08/2013  
**Date Lodged:** 07/08/2013  
**Late?:** False

**Document:** Revised LDP, p.30  
**Policy:** SP16  
**Summary:** Cross boundary implications - seek clarification as to why the M4 relief road has not been included in SP16

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#### Item Question  
**Representation Text**

**11**  
**Representation**  
Policy SP16 Major Road Schemes

Policy S16 identifies major road schemes for which land will be safeguarded over the plan period. Of note, the eastern extension of the southern distributor road is currently being upgraded from Junction 23A Magor to Queensway Meadow at Spyty and will provide a new strategic east-west link between the southern distributor road and Junction 23A at Magor.

Given proposals to develop the Eastern Expansion Area, it is important that the cross-boundary implications of the eastern extension of the southern distributor road and of traffic generated from development is thoroughly considered. Need for TIA to include that part of the highway network from the county boundary to Junction 23A. The need to safeguard the route of the proposed M4 relief road between Junction 23A at Magor and Junction 29 at Castleton is acknowledged in the supporting text to Policy S16, key diagram and constraints map. However, it is not included as a major road scheme for which land will be safeguarded in Policy S16. Seek clarification as to why the M4 relief road has not been included in Policy S16. Policy MV10 of the Monmouthshire LDP safeguards the route of M4 relief road that lies within its boundary.

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#### Item Question  
**Council Responses**

**13**  
**Council Response**

The M4 relief Road is a Welsh Government transport proposal and the legally protected route has been shown on the LDP Constraints Map. Policy GP4 outlines the requirements for new development in relation to highways impacts. Criterion vii) makes reference to highways capacity.
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<tr>
<th>Item Question</th>
<th>Representation Text</th>
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<tbody>
<tr>
<td>11 Representation</td>
<td>Policy SP17 Employment Land Requirement / SP18 Employment Sites</td>
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<td></td>
<td>Policy S17 makes provision for approximately 168 ha of employment land over the plan period. Employment forecasts are based on Experian Economics forecasts which anticipate that Newport’s economy will grow by 7,400 jobs over the LDP period. New industrial and business development is proposed in south east Newport within the Eastern Expansion Area (Policy S18). Given the area’s proximity to Magor/Undy the focus on this allocation is likely to bring additional employment prospects for the sub-region. The traffic generated by the proposed new development in this area is likely to have consequences for the M4 junction at Magor and possibly on the wider road network. A TIA will should therefore be undertaken and should include that part of the highway network from the County boundary to Junction 23A of the M4 motorway, including the partial cloverleaf interchange with the B4245.</td>
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<tr>
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<tr>
<td>13 Council Response</td>
<td>Detailed Transport Assessments will need to be submitted to the Council well before any development is permitted. The Council will need to be satisfied that any negative transport implications will be mitigated accordingly. With respect to any development likely to affect the M4 motorway, the Welsh Government, as Highway Authority, will also need to be satisfied.</td>
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</table>
Policy SP22 Minerals

It is noted that the Minerals Background Paper (June 2013) has not been updated in relation to the cross boundary position in Monmouthshire. It is assumed that reference will be made to Monmouthshire County Council’s letter of 30 May 2013 which sets out its position in this respect.

Council Response

The Minerals background paper sets out the cross boundary situation, including the recent letter from Monmouthshire which noted the potential to supply Newport with some of Newport's required apportionment. The Regional Technical Statement is currently being updated and as such the situation is being monitored and the requirement will need to be updated in line with the Regional approach.
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Document: Revised LDP, p.65

Policy: H1

Summary: TIA should be undertaken to Junction 23A of M4 including interchange with B4245

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**Item Question**  | **Representation Text**
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11 Representation | Policy H1 Housing Sites

Policy H1 identifies the main sources of housing land in Newport. The key sites with potential cross-boundary implications for Monmouthshire are the Eastern Expansion Area (H3) and Glan Llyn (former Llanwern) (H47) which make provision for 1,100 dwellings and 2,794 dwellings respectively over the plan period. Given the proximity of these allocations to the western boundary of Monmouthshire at Magor / Undy, the significant amount of residential development proposed in this area is likely to bring benefits of an expanding residential market for the sub-region.

The traffic generated by the proposed new development in this area is likely to have consequences for the M4 junction at Magor and possibly on the wider road network. A TIA will should therefore be undertaken and should include that part of the highway network from the County boundary to Junction 23A of the M4 motorway, including the partial cloverleaf interchange with the B4245.

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**Item Question**  | **Council Responses**
--- | ---
13 Council Response | Noted. A Traffic Impact Assessment was submitted at the outline planning application stage for the development at Glan Llyn as well as the northern, greenfield element of the Eastern Expansion Area.
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Document: Revised LDP, p.70
Policy: H04
Summary: More clarity required on affordable housing policy

**Representation Details**

**Item Question**  Council Responses

**Item Question**  Representation Text

11 11 Representation
Policy H4 Affordable Housing

Policy H4 sets out the proportion of affordable housing required on development sites. A number of concerns are raised with regard to the policy’s lack of detail on viability issues and absence of an overall target for the number of affordable units to be delivered over the plan period. It is not clear whether Newport is planning to meet its affordable housing requirements. Clarity is sought on this issue, particularly the relationship between the affordable housing policy and the Local Housing Market Assessment, which was carried out on a sub-regional basis with the adjoining authorities of Monmouthshire and Torfaen.

Item Question  Council Responses

13 13 Council Response

The detail of how the viability assessment will be undertaken will be set out in the Supplementary Planning Guidance. It is considered that the level of detail required would be too excessive to be written in the plan. There is an overall target of affordable units to be delivered over the plan period in policy SP10. It is made clear in policy SP10 that Newport is unable to meet its high level of affordable housing needs as set out in the Local Housing Market Assessment but that the Plan makes every effort to deliver as much as possible through the planning system. The Local Housing Market Assessment 2013 was undertaken in house in line with the Welsh Government guidance and replaces previous assessments undertaken with adjoining authorities. Cross boundary issues take into account any double counting.
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Document: Revised LDP, p. 76
Policy: H17
Summary: Support provision

**Item Question**

11 11 Representation
Policies H15 Gypsy and Traveller Transit Accommodation / H16 Gypsy and Traveller Residential Accommodation
Support provision of transit and residential gypsy and traveller sites in Newport identified in policies H15 and H16.

**Council Responses**

13 13 Council Response
Support noted.
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**Document:** Revised LDP, p.79  
**Policy:** EM01  
**Summary:** TIA should be undertaken from the County boundary to J23A of the M4 including the B4245 interchange

**Item Question**  
**Representation Text**

11 11 Representation  
Policy EM1 Employment Land Allocations

Policy EM1 identifies 34 ha of employment land at Queensway Meadows south of Glan Llyn for B1, B2 and B8 uses for single large user projects of at least 10 ha, and 16 ha at Gwent Europark for B8 uses. Gwent Europark adjoins Monmouthshire’s western boundary in Magor – its proposed use for B8 distribution uses is considered appropriate and reflects those employment allocations in the Magor area identified in the Monmouthshire LDP. The requirement for the conservation and enhancement of SSSI features to be central to the consideration of any future strategic employment proposals at Gwent Europark is welcomed and reflects Monmouthshire’s approach to the consideration of development proposals in this area.

Given the proximity to Magor/Undy these employment land allocations are likely to bring additional employment prospects for the sub-region.

Again, the traffic generated by the proposed developments in this area is likely to have consequences for the M4 junction at Magor and possibly on the wider road network. A TIA will should therefore be undertaken and should include that part of the highway network from the County boundary to Junction 23A of the M4 motorway, including the partial cloverleaf interchange with the B4245.

**Council Responses**

13 13 Council Response

Detailed Transport Assessments will need to be submitted to the Council well before any development is permitted. The Council will need to be satisfied that any negative transport implications will be mitigated accordingly. With respect to any development likely to affect the M4 motorway, the Welsh Government, as High Authority, will also need to be satisfied.
Policy EM2 Regeneration Sites

Policy EM2 encourages regeneration schemes at Llanwern former steelworks eastern end (39.5 ha for B1, B2, B8 use) and Llanwern former tipping area south of Queensway (122 ha for B1, B2, B8 use). Given the proximity of this area to the western boundary of Monmouthshire at Magor/Undy, it is considered that the continued focus on the former steelworks for employment development is likely to bring additional employment prospects for the sub-region.

The traffic generated by the proposed new development in this area is likely to have consequences for the M4 junction at Magor and possibly on the wider road network. A TIA will therefore be undertaken and should include that part of the highway network from the County boundary to Junction 23A of the M4 motorway, including the partial cloverleaf interchange with the B4245.

Council Response

Detailed Transport Assessments will need to be submitted to the Council well before any development is permitted. The Council will need to be satisfied that any negative transport implications will be mitigated accordingly. With respect to any development likely to affect the M4 motorway, the Welsh Government, as High Authority, will also need to be satisfied.
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<tbody>
<tr>
<td>11</td>
<td>Support the strategy’s emphasis on brownfield regeneration. Newport has significant regeneration / brownfield opportunities for new residential and employment development which should be maximised. The Deposit LDP does not appear to give any consideration to the spatial proposals / policies contained in the Monmouthshire Deposit LDP or to other adjoining development plans. Reference should be made to spatial strategies included in LDPs of neighbouring authorities and any cross border issues identified and taken into account (Soundness test C1 refers).</td>
<td>Support for strategy's emphasis on brownfield regeneration noted. The LDP may not contain explicit references to the LDPs of neighbouring authorities, but cross-boundary issues are addressed in relevant background papers. The Regional Context section of the LDP (page 13) also sets out cross-boundary issues which are discussed with neighbouring and other South East Wales authorities on an on-going basis.</td>
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Document: Revised LDP, p.6
Policy: Intro & Overview
Summary: General support for strategy
### Representation Details

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<td>The Brock Planning Consultancy</td>
<td>18/07/2013</td>
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<td>O</td>
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**Document:** Revised LDP, p.24

**Policy:** SP10

**Map:** Proposals East: Proposals Plan - East

**Summary:** Propose amendment to Langstone Settlement boundary to enable residential development

---

**Item Question**

- 6 | Amend the boundaries of an existing site
- 10 | Soundness Test

**Representation Text**

- Yes
- Yes

**Additional material submitted - Please click here**
by: (No grouping)
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Rep'n/Para/Policy     Representor                                                                      Agent              ...                               Accession No    Date Lodged    Late?   Source   Type    Mode     Status     Status Modified
11
11

I hold a Master of Arts degree from Cambridge University, together with a Post Graduate Diploma in Town Planning. I have been a Member of the Royal Town Planning Institute for over thirty years and have over thirty eight years experience in planning, working in both the public and private sector. Before establishing The Brock Planning Consultancy in 1984, I worked in the Planning Departments of Surrey County Council, Three Rivers District Council in Hertfordshire, Purbeck District Council in Dorset and Dean District Council in Gloucestershire.
I am the principal of The Brock Planning Consultancy, which was established over twenty eight years ago, and since that date have dealt with a wider angle of development proposals in and around Gloucestershire, Herefordshire, Worcestershire, South Wales and the South of England in general. The majority of the work of the Practice relates to providing preliminary advice on development opportunities, preparing and submitting planning applications and, where appropriate, presenting appeals on behalf of a wide range of clients. The Practice enjoys good working relationships with a significant number of allied professionals and consultants which enables requirements of statutory authorities to be properly addressed. In addition, the Practice has represented clients in relation to Local Plans, Local Development Frameworks, Structure Plans and Unitary Development Plans, including attendance and giving evidence at Development Plan Inquiries. I am familiar with the policies and proposals of the relevant Development Plan policies for the area, as well as national guidance and legislation.

2. INTRODUCTION

2.1 These representations have been prepared on behalf of Mrs Marjorie Kaid of Langstone Hall, Tregam Road, Langstone, Newport. Having carefully considered the Revised Deposit Local Development Plan produced by Newport City Council, Mrs Kaid wishes to comment and object to the filet that land at Langstone Hall is not incorporated within the Settlement Boundary of Langstone on the Proposal Map and considers that the Plan should be changed so as to incorporate Langstone Hall itself and other land as indicated in red on the attached Ordnance Survey based plan. Representations have been presented in the past on behalf of Mrs Kaid within various stages of the Local Development Plan to seek an amendment to the Settlement Boundary of Langstone which might then enable a small scale residential development to take place on her land.

2.2 Newport City Council has been undertaking consultations in connection with their emerging Local Development Plan for some five years. In preparing these representations, careful consideration has been given to the Plan itself and, in these representations, reference will be drawn to the nature of the area proposed to be incorporated within the Defined Settlement Boundary of Langstone, relevant planning history in the locality and a judgement made on the way in which the Local Development Plan has developed. It will be concluded that amending the Settlement Boundary, as proposed, represents a modest change which will not have any adverse effect upon the character and appearance of the area but would, undoubtedly, provide a logical, sustainable small site for residential development, thereby assisting in sustaining existing services and facilities within the settlement of Langstone.

3. SITE LOCATION & DESCRIPTION

3.1 As highlighted in Section 2 above, at Appendix A to this statement an Ordnance Survey based plan is provided indicating an area of land extending to approximately 1 hectare which is considered could reasonably be incorporated within the Settlement Boundary of Langstone without harm to any interest of acknowledged importance. Langstone Hall has been the respondent's home for several decades and itself comprises a substantial detached property situated within the settlement of Langstone and served by an existing road way to Tregarn Road. Along its eastern boundary, there is an existing drive which extends northwards to a further dwelling arising from a conversion scheme which took place in the 1990s. Other land to the north and west of the area outlined in red on the plan provided at Appendix A to this statement also lies within the respondent's ownership. From inspection, it will be noted that Langstone Hall and its curtilage are elevated above surrounding development and there are now well established boundaries. To the south of the area edged red, there is a small estate of detached dwellings which were also constructed in the 1990s on land which had formerly been part of the grounds associated with Langstone Hall. These dwellings were constructed following an appeal decision, bearing in mind Newport City Council had refused planning permission for the development in question. This development is served by a highway (known as Langstone Rise) which emerges onto Tregarn Road and the same access road serves Langstone Hall and the converted agricultural building referred to above by private driveways.

3.2 Other development within the locality principally comprises detached houses and bungalows, the majority of which are set in reasonably spacious grounds. From inspection of the area, it will be noted that there is no particular pattern to the residential development and the character of the existing residential development is highly varied in terms of design, age of properties and use of external materials. Many new properties have been constructed through sub-division of existing plots and by infill development. The settlement of Langstone is served by the A48 Highway which, historically, linked Chepstow to the east with Newport to the west. Much of the development occurred in ribbon form along the A48 Highway and along the road network radiating from that highway. Langstone now enjoys a good level of local community facilities and services as well as extensive employment areas. Pressure for development in Langstone arises primarily from its excellent location in terms of communications, together with its proximity to nearby Newport and Cardiff. At its western end, there is a junction to the M4 motorway and public transport routes operate through Langstone, ensuring a choice of modes of transport, Langstone Hall, together with the rest of the area edged in red on the plan in Appendix is well situated to take advantage of local facilities and services, together with public transport routes.

4. PLANNING HISTORY

4.1 Over the last 25 years, Langstone Hall and its grounds has been the subject of a number of development proposals. Bearing in mind the nature of these representations, it is relevant to highlight the planning history, taking into account that each application was presented at a time when the individual site areas were outside the Settlement Boundary of Langstone.
4.3 The first application of significance was submitted in 1991 seeking a change of use of Langstone Hall itself to a 25 bedroomed nursing home. A conditional planning permission was granted for that development on the 4 September, 1992 under Reference: 91/1394.

4.4 In 1994, an outline planning application was submitted for the erection of 8 dwellings on an area of land fronting Tregarn Road. That application was refused outline planning permission on the 13 January, 1995 under Reference: 94/1048 and a subsequent appeal was dismissed in October, 1995 based upon the fact that the site fell outside the Settlement Boundary of Langstone. In 1995, a further outline planning application for the erection of 8 dwellings was submitted to the Council and registered under Reference: 95/1069. The Local Planning Authority refused planning permission for the development but a subsequent appeal was allowed on the 30 April, 1996. In 1997, a further application was submitted to allow change of use of Langstone Hall to a nursing home and those proposals were approved by the Authority under Reference: 97/0143.

4.5 In 1997, Barrett Homes submitted a planning application for the erection of 13 dwellings on the area of land for which outline planning permission had been granted for 8 dwellings then appeal in 1996. That application was refused permission by the Council on the 24 June, 1998 under Reference: 97/1238. Barrett Homes then submitted a planning application for the erection of 10 dwellings on the same area of land and conditional planning permission was granted for that development on the 14 January, 1999 under Reference: 98/1029. The small estate of 10 dwellings to the south of Langstone Hall, fronting Tregarn Road were constructed in accordance with that planning permission.

4.6 In 2002 an outline planning application was submitted for residential development of land south of Langstone Hall and that application was registered under Reference: 02/0689. That application was subsequently withdrawn in October, 2002. In January, 2003 a similar application was submitted for residential development in outline form and that application was registered under the Reference: 03/0020. The Local Planning Authority refused permission on the 24 February, 2003 and a subsequent appeal was dismissed in July, 2003, based upon the fact that the site lay outside the Settlement Boundary of Langstone. Finally, in 2004, an outline planning application for the erection of one dwelling in the curtilage of Langstone Hall was submitted and registered under Reference: 04/0536. Those proposals were refused planning permission in May, 2004.

4.7 The only proposal for commercial development on the site relates to a planning application submitted in 2007 involving demolition of Langstone Hall and the erection of a 60 bed care home. That application was refused permission in July, 2008 under Reference: 07/1537. The reasons for refusal related to the fact that the application site was outside the Settlement Boundary of Langstone and concern was also raised in terms of the size of the proposed care home building, access arrangements, infrastructure inadequacies and lack of demonstrable need.

5. THE EMERGING LOCAL DEVELOPMENT PLAN

5.1 Under the Town & Country Planning Act, 1990, development proposals are required to be determined in accordance with the Development Plan for an area. The current Development Plan comprises the Newport Unitary Development Plan 1996-2011, which was adopted by the Local Planning Authority in May, 2006.

5.2 Since 2008, Newport City Council has been preparing their Local Development Plan to cover the period 2011-2026. The Planning & Compulsory Purchase Act, 2004 required Local Planning Authorities to prepare the Local Development Plan and the Deposit version of the Plan was produced in 2012. Following consultation on the Deposit version, issues were raised which required changes to the Plan and Newport City Council has now approved the revised Deposit Local Development Plan for consultation purposes. Comments have been made at various stages of the Plan process on behalf of the respondent by this Practice but it has been confirmed by Newport City Council, comments made in relation to previous public consultation exercises will not automatically be considered in respect of the revised Deposit version of the Plan. Therefore, a response is required at this stage if the respondent wishes her views to be considered at Examination.

5.3 It is acknowledged that the revised Deposit LDP seeks to achieve the sustainable development strategy with a focus on re-generating, building on the culture and heritage of the city and seeking to maximise the use of previously developed brownfield land. It is also acknowledged that the Plan has been prepared in the context of the growing awareness of the need to produce and use energy in more sustainable ways. Consideration of the revised Deposit version serves to confirm ten main objectives dealing with sustainable use of land, climate change, economic growth, housing provision, conservation of the built environment, conservation of the natural environment, community facilities and infrastructure, culture and accessibility and health and well-being and waste. The Plan includes twenty two strategic policies together with a range of general policies.

Chapter six of the Plan deals with housing and given the objective of altering the Settlement Boundary to incorporate the land at Langstone Hall, this chapter is of specific relevance. Strategic Policy 10 deals with house building requirements, confirming that over the Plan period, over 10,000 new dwelling units are to be provided within the Council's administrative area. The objective is that the majority of the house building requirements will be provided by re-use of previously developed land. It is, however, acknowledged that in addition to previously developed land and the specific allocations set out in Policy H1, other infill development, windfall and small sites "will contribute to the overall housing provision over the Plan period. It is specifically confirmed that housing outside Settlement Boundaries will not be allowed unless compliant with Policy H5 which deals with affordable housing provision. The key diagram to the Plan confirms that the area edged red on the Plan at Appendix A lies outside the Proposed Settlement Boundary of Langstone and would, therefore, be viewed as open countryside for development control purposes.

5.4 Given the respondent's objective of providing for some new residential development on the land between the curtilage of Langstone Hall and the residential development fronting Tregarn Road (known as Langstone Rise), this objection is necessary to Newport City Council's revised Deposit Local Development Plan.

6. MERITS OF AMENDING THE SETTLEMENT BOUNDARY TO INCORPORATE THE RESPONDENT'S LAND.

6.1 From inspection of the area, it is apparent that the development of 10 ten dwellings formerly in the grounds of Langstone Hall have assimilated satisfactorily with existing development in the area. However, it will be noted from the planning history section above that the Local Planning Authority consistently resisted development on this site until such time as the appeal was allowed in April, 1996.
6.2 As highlighted in Section 3 above, Langstone is a sustainable location to accommodate new general residential development and over the last 20 years, new house building has occurred, principally by way of infill development and sub-division of existing residential curtilages. The opportunities for further, similar development over the Plan period to 2026 is now limited and, whilst the general soundness of the major housing allocations of the Plan are not being challenged, it is generally considered that in connection with small areas of land of this nature, the Plan is unsound by not providing any significant degree of flexibility. In effect, as far as Langstone itself is concerned, notwithstanding the fact that a substantial number of new dwellings are required to be accommodated within the Council's administrative area over the Plan period, no changes are being proposed by the City Council. Preparation of the current adopted UDP started in the late 1990s and, by simply reproducing exactly the same Settlement Boundaries, the opportunities for new development in sustainable locations are being missed. The modest change to the Settlement Boundary as proposed in these representations would have no significant bearing upon the overall housing land supply but, clearly sites of different sizes attract different forms of development.

6.3 Given the fact that Langstone Hall itself will need to retain a curtilage commensurate with the size of the property, the actual area where new residential development could be accommodated, if the Settlement Boundary were to be amended, as recommended by these representations, comprises the area to the south of Langstone Hall and to the north of the properties in Langstone Rise. This area of land has historically accommodated other buildings including stables and a piggery and, to that end, could justifiably be viewed as previously developed land. The area of land in question extends to approximately 0.4 hectares and has no beneficial use. Development proposals for this land have been resisted in the past purely based upon the fact that the site does lie outside the Defined Settlement Boundary of Langstone, notwithstanding the fact that in all other respects a small scale development would be achieved in a sustainable location where no harm would arise to any interest of acknowledged importance. It clearly would be practical to provide for a small number of new dwellings carefully designed and sited so as to avoid any adverse effects upon adjoining land uses. It is, therefore, the inflexibility of retaining the original boundaries to the settlement from the UDP which is critical in this regard, particularly bearing in mind the fact that small sites are identified in the chapter on housing as providing a significant proportion of new dwellings over the Plan period and yet there clearly is a diminishing supply of small sites as time progresses if no changes are made to Settlement Boundaries such as the one being advocated in this instance.

7. Sustainability APPRAISAL

7.1 The guidance notes relating to presenting representations confirm that if one is proposing to add a new site then the representation forms should be accompanied by a Sustainability Appraisal. Prior to preparing these representations, correspondence took place with the Senior Planning Policy Officer of the Council to establish whether a proposed boundary change would require a Sustainability Appraisal. It was confirmed that respondents should consider whether the proposed boundary change represents a significant change or have a significant environmental effect. It was further confirmed that if the proposed change is a minor alteration then respondents might consider that any effects may have already been considered as part of the Authority's own SEA and, therefore, a further assessment would be unnecessary. Only in circumstances where the proposed change was likely to have a significant environmental effect, such as impact upon an SSSI would respondents need to undertake an SEA.

7.2 In the light of this advice, it has been concluded that a Sustainability Appraisal would be unnecessary in this instance. The boundary change being proposed is relatively minor. A reasonable proportion of the site comprises the residential curtilage of Langstone Hall, where no changes are likely to occur. The residual area of land has not been identified as having any wildlife interest. Given the scale of development which could be accommodated on that land, together with the sustainability credentials of the site in general, a Sustainability Appraisal is unnecessary. It will be noted that no objections are being raised in connection with the consultation on the Sustainability Appraisal, which itself is considered to be reasonably sound.

8. CONCLUSIONS

8.1 From the information contained within this report, it will be clear that, historically, a number of proposals have been presented in the past on behalf of the respondent for development of land associated with Langstone Hall. The main basis of concerns raised by the Local Planning Authority in dealing with those submissions has been the fact that the land in question has been defined by the Local Planning Authority as lying outside the Settlement Boundary of Langstone. Development which has been authorised following an appeal has clearly assimilated satisfactorily without causing harm. The revised Deposit version of the Plan, notwithstanding representations made in the past, has not proposed any amendments to the Settlement Boundary of Langstone and this serves to preclude sustainable small sites being-developed sensitively. The opportunities to develop small sites diminishes where boundaries remain unaltered and there must, in these circumstances, be a serious question relating to the soundness of the Plan due to its inflexibility in terms of Settlement Boundaries. No specific evidence is provided in the Plan to indicate that careful consideration has been given to amending the original boundaries from the UDP for Langstone so as to ensure that the aims and objectives of the Plan, in terms of small housing sites, is achieved. The soundness of the Plan would be improved by amending the Development Plan to incorporate the area of land outlined in red on the plan in Appendix A.
It is clear from the varied planning history the site holds, that Newport City Council has resisted development at the site. The supply of housing set out in the Plan is considered able to provide for a clear range and choice of housing. The housing sites within the Plan are located across the City, with a clear focus on regeneration in the east as per the established strategy. The Plan provides a supply of affordable units for a mixture of needs as well as providing a mix of family homes and inner city living to cater for the broad housing market. The opportunity to provide homes in more rural locations has been investigated and there was no clear evidence to justify expansion to existing settlements. The Plan therefore has provided the opportunity for exception sites where such justification can be produced.

During the Local Development Plan process for Newport a broad evidence base has been developed. This evidence base includes the Settlement Boundary Methodology Paper 2013, which assessed the Langstone boundary, and provides a review of settlement boundaries and the reasoning for any proposed changes. Overall the decision has been made to tighten the settlement boundary in order to ensure development occurs in sustainable locations.

The proposed site is located adjacent the urban boundary; however it does not form a logical extension to the boundary.

The plan seeks to promote the reuse of Brownfield sites in preference to extensive use of Greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities.

The forecast housing need has been assessed in the context of population and employment projections and current market realities. The Plan allocates more than sufficient land to meet this requirement. Additional housing allocations in a rural location cannot therefore be justified. Furthermore, the release of the representation site for housing would be contrary to the Council’s strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

It is recommended that this site is not included in the Local Development Plan for development.
Document: Revised LDP, p.21
Policy: SP05
Summary: Object to the proposed village boundary at Bishton and propose two amendments.

Representation Details
by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M

Rep'n/Para/Policy Representer
39.L1//SP05 Bishton Community Council

Accession No Date Lodged Late? Source Type Mode Status Status Modified
29/07/2013 P O M

Additional material submitted - Please click here

Representation Details
by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M

Rep'n/Para/Policy Representer
39.L1//SP05 Bishton Community Council

Accession No Date Lodged Late? Source Type Mode Status Status Modified
29/07/2013 P O M

Additional material submitted - Please click here

Representation Details
by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M

Rep'n/Para/Policy Representer
39.L1//SP05 Bishton Community Council

Accession No Date Lodged Late? Source Type Mode Status Status Modified
29/07/2013 P O M

Additional material submitted - Please click here

Item Question Representation Text
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11
Representation
Please accept this letter as a formal objection to your decision regarding the BCC request to amend the proposed Village boundaries as drawings Site Ref AS(A)023 (3152.D1&3321D2) and Site Ref AS(A)024 (3152.D1) (3221.D2) attached.

Firstly may I state BCC are very disappointed in your response once again not consulting with BCC regarding your decisions. These boundary changes have now been submitted for several years leading up to the decision and once again your team could not even be bothered to invite BCC to the site visits of the sites as earlier promised. Might I remind you of the Peoples Charter BCC signed with NCC. You obviously have not researched the village as on page 204 your objections to grant states "with no known transport services". This suggests that this has just been a desktop formal rejection. Bishton does in fact have a bus service provided by no other than Newport Transport. I include a bus time table for information to your team when reconsidering your decisions.

I would like to state that the two areas BCC would like included within the boundaries are probably some of the oldest properties in the Village. The Boundaries have obviously been wrongly drawn up probably by some one at a desk drawing a ring around an area they see fit not taking this fact into consideration. How can these areas possibly be considered as outside the Village Boundaries? The Villagers in these properties are wrongly being discriminated against.

I would like to state that the Village of Bishton is becoming less and less attractive to any one wishing to live here as the Village has now seen closure of the Village shop, Post Office, Public House and even the Telephone Box. This is due to reasonable development within the Village not being granted.

Villagers have siblings which would dearly love to live within the Village although this is not being permitted due to your archaic planning decisions. Bishton overlooks the Llanwern Steelworks and also probably the largest warehouses in the country although reasonable development within the wrongly drawn Village boundaries is not being considered.

BCC feel very strongly that our proposals are correct and reasonable and intend to pursue this to the highest level of authority to achieve our objectives.

Item Question Council Responses
13
13
Council Response
Comments relate to both sites put forward by representor:

The Newport LDP Preferred Strategy discourages development in Bishton unless it would serve a clear strategic purpose. Any amendment to the settlement boundary that might result in inappropriate housing development would clearly be at variance with this principle. One ought to bear in mind, however, that Policy H5 of the LDP allows for exceptions where affordable housing is concerned. Specifically, it is stated that, where a genuine local need is identified, proposals for affordable housing on sites within, or adjacent to, settlements will be considered favourably, provided that such housing would remain affordable in the long term.

The Revised Deposit LDP promotes ‘brownfield’ development, whereby proposals are directed towards previously developed sites with comprehensive public-transport networks. Bishton, a small rural village with few public-transport links, is precisely the type of unsustainable location where development is resisted. In view of this, it is proposed to maintain a tight village boundary around the existing built form and those sites which benefit from ‘live’ planning permission.
**Representation Details**

**Document:** Revised LDP, p. 75  
**Policy:** H15.01  
**Summary:** Object to gypsy and traveller site at Celtic Way, Coedkernew.

**Item Question**  
Delete an existing site

**Representation Text**

Members have asked me to write to you with regards to the proposed Gypsy/Traveller site identified by Newport City Council at land off Celtic Way Coedkernew.

The community council believe the site to be unsuitable for the following reasons, the site is in an area earmarked for business use, a site of this type could put off new business opportunities, the local school at Marshfield is already full with local children being refused access and having to travel to other areas, there are no shops, no doctors surgery or clinic, no play areas, no street lighting.

The area of Coedkernew is already being used as an illegal gypsy/traveller encampment, with hundreds of thousands of pounds already spent clearing up the tipping following these visits, as well as the horses which have caused havoc not only to the residents but also businesses in the Celtic Springs area, the residents have endured this situation for many years and deserve some peace in the future.

**Council Responses**

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

As this site will only be a transit site for Gypsy/Travellers to temporarily stay, it is unlikely they will seek school places for their children. The same is true with regard to a GP surgery, although in terms of the latter, the site is within easy access of St Brides medical centre.

The Council has a duty to provide accommodation for the Gypsy/Traveller population. We do not have a duty to provide land for horses. The site will be owned by the Council and there is no intention to allow the occupants to keep horses on site.

The site will be designed as a transit site and therefore only used by Gypsy/Travellers on a temporary basis as they pass through Newport. It is expected that the Gypsy/Travellers will use their vehicles to move around and there will be limited activity in terms of moving around the area on foot. Therefore the fact there is poor street lighting and a lack of pavement is not considered to be a significant concern in relation to a transit site. Increased street lighting could be provided if Members consider it to be essential.
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<tr>
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<th>Agent</th>
<th>Accession No</th>
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<td>02/08/2013</td>
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Document: Revised LDP, p.30  
Policy: SP16  
Summary: Pleased to see SEWTA is supported by the Local Authority

**Representation**

The Council are pleased to see SEWTA is supported by the Local Authority as this provides collaboration to ensure transport links are continuous between different adjoining regions.

**Council Response**

Support noted.

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<th>Rep'n/Para/Policy</th>
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Document: Revised LDP, p.21  
Policy: SP06  
Summary: Supports green belt between Newport and Cardiff

**Representation**

Council is pleased to see that the green belt between Newport and Cardiff (including the minor extension) is to be maintained and must be protected.

**Council Response**

Support noted.
## Representation Details

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**Summary:** Support for designated Special Landscape Areas

**Item Question**  
Representing:

11 11  
Rep'tn: Council supports the designated Special Landscape Areas, specifically (ii) West of Rhiwderin, and all the countryside bordering the built up areas of Bassaleg and Rhiwderin. Council strongly objects to the development of any Candidate Sites within this SLA as it would contravene the objective of policy CE5 (Environmental Spaces, q.v.). Additionally the principle and local highways network is incapable of supporting further large-scale development.

**Item Question**  
Council Responses:

13 13  
Council Response:

Support noted.

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## Representation Details

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**Summary:** Agrees that cemeteries should be made more environmentally friendly.

**Item Question**  
Representing:

11 11  
Rep'tn: Council agrees with the need to make cemeteries more environmentally friendly.

**Item Question**  
Council Responses:

13 13  
Council Response:

Support noted.
<table>
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<tr>
<th>Item Question</th>
<th>Representation Text</th>
<th>Council Responses</th>
</tr>
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<tbody>
<tr>
<td>11 11 Representation</td>
<td>Council feels the Junction 28 roundabout needs significant improvement and has been requesting this for the past 18 months to no avail, so are pleased to see this issue will be addressed. As this issue was given a public consultation in October 2001, Council urges that this be attended to at the earliest opportunity. Council are concerned that no commitments to improve the feeder roads into this junction have been made and that they will also need upgrading to prevent bottlenecks occurring elsewhere.</td>
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<th>Council Responses</th>
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<tr>
<td>13 13 Council Response</td>
<td>Junction 28 of the M4 is listed as a Major Road scheme.</td>
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<th>Item Question</th>
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<tr>
<td>11 11 Representation</td>
<td>Council broadly supports the Duffryn Link as a relief to the M4 and Junction 28 provided the appropriate steps are strictly monitored to have minimal impact on the surrounding environment.</td>
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<td>13 13 Council Response</td>
<td>Support noted.</td>
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<td>42.L7//CE11</td>
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Document: Revised LDP, p.62
Policy: CE11
Summary: Support renewable energy supplies and protection of important sites

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<th>Item Question</th>
<th>Representation Text</th>
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<tr>
<td>11</td>
<td>Council are pleased to support renewable energy supplies and applaud the fact that the protection of important sites will not be compromised.</td>
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<td>13</td>
<td>Council Response</td>
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<td></td>
<td>Support noted.</td>
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**Representation Details**

**Document:** Revised LDP, p.68

**Policy:** H01.54

**Summary:** Some concerns with delivery of Alcan Site - flooding and traffic

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<tr>
<th>Item Question</th>
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<tr>
<td>11</td>
<td>Council has some concerns regarding site H54 (Alcan). Proper consideration needs to be given to the fact that the site is only 2 feet above the river level so flooding would be a very real danger, and also that the development of the site would put an overbearing strain on the already inadequate road infrastructure and amenities of the local area which should be addressed prior to any development taking place. Also the Former Tredegar Park Golf Club site is of concern regarding the above problems of infrastructure, amenities and flood risk. Council are wary of the fact that these sites are earmarked for 700 and 150 units respectively, but past experience dictates that final figures for housing stock on these sites are likely to be much higher, posing even more stress on local facilities than expected. Council is of the view that large-scale development on these sites should not be permitted until the proposed improvements to Junction 28 are in place. As the tables show, if developments H12, H26, H44 &amp; H54 are completed to just the numbers stated this will place a further 320 dwellings either within the Graig ward or on its borders, a very significant percentage when compared to the size and scale of the ward as it currently stands prior to these developments.</td>
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</table>

**Council Response**

The former Alcan site has been granted planning approval for up to 1200 units with a signed section 106 agreement, and there is movement on the site with site clearance and remediation. The former Tredegar Park Golf Course site has been granted planning approval for 150 units on appeal and the flood mitigation measures associated with the development are being progressed. There is pressure from the land owners to increase the level from 150 to 200 units; this is dealt with under a separate representation. The LDP notes the need to improve junction 28 of the M4 to deal with the congestion in the area and would need to be progressed with the Welsh Government. However, when considering applications, the Council considers the impact on highways, flood risk and community facilities. Therefore any improvements required to the highway etc. would be conditioned to the application.
### Rep'n/Para/Policy: 42.L9/H01
**Graig Community Council**

**Date Lodged:** 02/08/2013  
**Accession No:** 42.L9//H01  
**Status:** M  

**Summary:** Concern that windfall sites will place greater stress on infrastructure

**Represented by:** Graig Community Council

**Item Question Representation Text:**

Council are concerned that although no windfall sites are designated, that potentially 750 houses on hidden plots of land could be built within the life of the LDP. This would significantly burden current infrastructure and amenities which are already under great stress. There are areas in the Graig ward which are currently garage blocks under the ownership of Newport City Homes which Council believe are earmarked for future development, as would some small green areas around the villages, these areas would be likely to fall into this category and be allowed for development which is of concern.

**Item Question Council Responses:**

13 13  
**Council Response**: The Plan is required to consider the implications of windfall sites as Planning Policy Wales notes that 'flexibility will be needed in respect of the emergence of unidentified sites, i.e. sites not allocated in the LDP for the particular type of development are generally referred to as windfall sites, para 2.5.2.' The settlement boundary of village areas has been reviewed and tightened where it was felt necessary to do so. Green or open spaces are protected in line with Policy CE5. The impact of development on existing infrastructure including amenities will be considered at the planning application stage.

### Rep'n/Para/Policy: 42.L10/T01
**Graig Community Council**

**Date Lodged:** 02/08/2013  
**Accession No:** 42.L10//T01  
**Status:** M  

**Summary:** Support for the Pye Corner Railway Link

**Represented by:** Graig Community Council

**Item Question Representation Text:**

Council fully support the Pye Corner railway link and hopes it will be completed as soon as possible with the adequate parking facilities needed. Council also supports the re-opening of the Ebbw Vale to Newport rail link as soon as feasible to breathe new life into the City, and generally supports the other several proposals listed.

**Item Question Council Responses:**

13 13  
**Council Response**: Support noted.
Item Question  Representation Text

11  11  Representation

Council supports that adequate off road parking should be provided at all new developments. It is a fact that households now have multiple cars per family. Many issues encountered by Council are as a result of residents not being able to park off-road.

Item Question  Council Responses

13  13  Council Response

Support noted.

Document: Revised LDP, p.88
Policy: T04
Summary: Support adequate off road parking
### Representation Details

<table>
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<tr>
<th>Rep'n/Para/Policy</th>
<th>Representor</th>
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<td>02/08/2013</td>
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**Document:** Revised LDP, p.111  
**Policy:** CF11  
**Summary:** Supports the provision of leisure facilities and stresses that facilities are insufficient in Graig ward

**Representation**

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<tr>
<th>Item Question</th>
<th>Representation Text</th>
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<tr>
<td>13</td>
<td>Support and comments noted.</td>
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</table>

**Council Response**

- Support and comments noted.

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### Item Question: Council Responses

- **Council Response:** Support and comments noted.

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**42.L14/monitoring** Graig Community Council  
**Document:** Revised LDP, p.121  
**Policy:** Monitoring Framework  
**Summary:** Council requests a copy of the Annual Monitoring Report

**Representation**

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<th>Item Question</th>
<th>Representation Text</th>
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<tbody>
<tr>
<td>11</td>
<td>Council requests that Community Councils be allowed a copy of the Annual Monitoring Report.</td>
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</table>

**Council Response**

- Request noted. AMR will be published online. It should be possible to provide paper copies if necessary.
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<th>Item Question</th>
<th>Representation Text</th>
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<tr>
<td>11 Representation</td>
<td>General comments regarding the Graig ward: There are feelings that the Graig ward’s village identity is being gradually lost in a &quot;fill it 'til it bursts&quot; approach, local amenities and the infrastructure for the current number of residents are extremely poor and are worsening with each new site being developed, the quality of life is deteriorating at pace. Forward planning for extra facilities and infrastructure for the ward must be a priority before any further large-scale development takes place.</td>
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<tr>
<td>13 Council Response</td>
<td>The only housing site in the LDP is H1(48), which is already under construction. No other major developments are proposed in the LDP. Small sites are monitored; therefore, the overall impact of development on demand for services/infrastructure can be monitored. The scope for further windfall sites in Graig is limited, and Alternative Site proposals for additional land allocations adjacent to the urban boundary in Graig are being resisted by the Council.</td>
</tr>
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</table>
**Representation Details**

Document: Revised LDP, p.6  
Policy: Intro & Overview  
Summary: General criticisms

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**Item Question**  
**Representation Text**

11  
**Representation**  
Overview of the document as a whole:  
Criticisms:  
The vision & objectives do not match the widely held perception that Newport is in decline. Its transport infrastructure is fragmented, its cultural & sporting facilities meagre & the focal point for residents to meet & shop is dismal & shabby. Such a situation will not attract the necessary investment. The LDP must demonstrate a comprehensive, integrated scheme, to develop & revitalise Newport with an emphasis on quality, in which its citizens can believe. There must be an integrated transport system: train, bus, safe cycle routes & walkways, adequate car parking as a first step to minimise environmental impact.

---

**Item Question**  
**Council Responses**

13  
**Council Response**  
It is felt that the LDP addresses each of the issues raised. For instance, the plan acknowledges the challenges that lie ahead of Newport as a city, and great emphasis is placed on the need to provide a comprehensive and sustainable transport network. Newport City Council is taking a positive approach, with a view to creating opportunities for growth and investment.
### Representation Details

**Graig Community Council**

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**Policy:** Intro & Overview

**Summary:** General Support and Praise

**Representation**

- **Praise:** Newport’s waste collection & disposal facilities are excellent.
- The parks, gardens & flower displays are excellent.
- The Wetlands are a wonderful feature.
- Tredegar House is a little gem to be nurtured.

**Council Response**

Support/praise noted.

---

### Langstone Community Council

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**Policy:** H01

**Summary:** Need to improve infrastructure if additional housing is proposed.

**Representation**

- **H Housing**

  The Council notes resident’s concerns in regards to the lack of infrastructure, mains sewage and amenities that have been provided with recent residential planning permissions in Langstone and seeks reassurances to be included in the Plan stating that if any residential development is proposed in the future it will only be considered if it provides increased amenities and improved sewage and infrastructure.

**Council Response**

The impact of development on existing infrastructure, including amenities, will be considered at the planning application stage. It is considered that the Revised LDP provides a suitable policy framework to ensure infrastructure is adequately provided by developments through either CIL or Section 106 agreements.
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Document: Revised LDP, p. 75
Policy: General G&T
Summary: Support for Gypsy and Traveller site allocations in the LDP.

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<td>11</td>
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<td>H15 – Gypsy and Traveller Accommodation</td>
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<td></td>
<td>The Council supports the inclusion in the Plan of sites for Gypsy and Traveller accommodation at locations other than which were being considered within Langstone and notes that the plan emphasises that the Langstone sites considered did not meet Welsh Government criteria.</td>
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<th>Item Question</th>
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<td>13</td>
<td>Council Response</td>
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<td>Support noted.</td>
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Representation Details

by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M
Rep'n/Para/Policy Representer Accession No Date Lodged Late? Source Type Mode Status Status Modified

43.L4//CF13 Langstone Community Council 26/07/2013 E M

Document: Revised LDP, p.113
Policy: CF13
Summary: Requirement for Welsh medium secondary school.

**Item Question** 
**Representation Text**

11 11 Representation

CF13 – School Sites
The council note that whilst it was stated that there would be an additional need for Welsh Medium Primary Schools within the life of the plan no provision for Welsh Medium Secondary Schools within the Newport area had been included in the plan. The council seek confirmation that this area of Welsh Medium Education has been considered and request that details of the how this increasing need will be addressed to be included in the deposit plan. There are currently 3 feeder schools within Newport and it is understood that Ysgol Gyfun Gwyrtryw the Welsh-medium comprehensive school located in Trevethin, Pontypool, to which pupils are currently sent has indicated that it is oversubscribed and will not be accepting pupils from outside the area from Sept 2016.

**Item Question** 
**Council Responses**

13 13 Council Response

At the time, there were no plans to host a WM2 school in Newport to support increasing demand. Since that time, a partnership arrangement has been set up between Welsh Government, Newport City Council and Monmouthshire CBC to host a south Gwent WM2 within Newport. This is in the early stages of planning, and no locations have been identified at the moment. It is considered that such a proposal can be supported on an appropriate site via the existing LDP policies.

43.L5//W01 Langstone Community Council 26/07/2013 E C M

Document: Revised LDP, p.117
Policy: W01
Summary: Note the decision to not build incinerator in Newport.

**Item Question** 
**Representation Text**

11 11 Representation

11 Waste
The Council note the decision not to build the proposed incinerator in Newport and agree with this decision.

**Item Question** 
**Council Responses**

13 13 Council Response

Comments noted.

12/02/2014

Page 32 of 1581
Representation Details

Filtered to show: (all of) Stage=L; Status=M

Rep'n/Para/Policy     Representer     Agent     Accession No     Date Lodged     Late?     Source     Type     Mode     Status     Status Modified

43.L6//SP12 Langstone Community Council

Document: Revised LDP, p.26
Policy: SP12

Summary: Support for improved community facilities in Langstone including new site at Langstone Court Road.

---

**Item Question** | **Representation Text**
--- | ---
11 | **SP12 Community Facilities**

The Council notes the proposals contained herein and wish to highlight the existing lack of facilities provided in Langstone together with the lack of available land to provide additional facilities. The Council notes NCC's contention that it will encourage the development of new community facilities in sustainable locations and would emphasise that Langstone is experiencing significant growth due to two separate housing developments with no increase to existing community facilities.

The Council would therefore wish to restate its position with regard to candidate site 2051.C1 Langstone Court Road Proposed Community Centre and associated facilities on 1.74ha, which formed part of the previous Deposit LDP and ask that list site be entered into the Revised Plan.

The Council supports this candidate site being included in the Plan as it would provide much needed leisure/sports facilities for the community. The Council notes NCC's comments when NCC previously rejected the site that extending the boundary would set a precedent but it believes that NCC's decision to propose and consider the site as a potential location for a permanent Gypsy and Traveller Site negates that earlier position.

There are no other facilities other than a small park in Langstone and the Council is not aware of any other suitable land that could be converted for this use.

---

**Item Question** | **Council Responses**
--- | ---
13 | Council Response

When candidate sites were being assessed, NCC felt that this site would be inappropriate for community facilities because it is situated outside the village boundary. Such a development would be contrary to national and local planning policy. The possibility of creating a G&T site that would meet an identified affordable-housing need and accord with ‘rural exception’ policy was explored, but was discounted from the Scrutiny Committee site search.
Marshfield Community Council supports the proposed LDP, specifically the strategy of utilising brownfield sites for development and safeguarding green wedges, green belt and open landscape sites. We support the tightening of the settlement boundaries for Marshfield and Castleton. However, we have concerns around the siting of the Traveller and Gypsy transit site on designated employment land at Coedkernew. This will have a detrimental impact on existing businesses and industry, and subsequent likely decrease in opportunities attracting new employment to the area.

It is acknowledged that the proposed gypsy/traveller transit site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

12/02/2014
**Representation Details**

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Document: Revised LDP, p.6

Policy: Intro & Overview

Summary: Support for the Plan as it covers the needs of the city particularly regeneration of city centre and provision of railway station.

---

**Item Question**  
**Representation Text**

May firstly thank you for such a clear presentation at the public meeting on 18th July.

In general the proposals set out in LDP cover the needs of the city especially the rejuvenation of the city center and land allocated near current successful industrial sites for their expansion. The allocation of new railway stations could only encourage people into Newport to work this is long over due at a number of locations and the one planned for Coedkernew can only help to increase the employment in this area.

The housing numbers proposed again show that Newport as a city is expanding and new industry will have a local workforce.

The green belt to separate Newport from Cardiff will keep the cities identity intact and with the rejuvenation that is taking place this will only improve.

---

**Item Question**  
**Council Responses**

Support noted.
Item Question  Representation Text

11 11  

Our main concerns are the plans for the Gypsy and Traveller site. The residential site will only partly address the numbers of Gypsy and Travellers that reside in the Newport area as this only looks to house the 3 families and there are much more resident on unlawful sites than just these.

The transit site location is of a more major concern. This location does not seem to take into account the high population of Gypsy and Travellers in the area west of the city. The location also does not fit with the high profile businesses in this area and the land allocated for its expansion. This would lock the site at the heart of this area. This could not only stop any future companies considering this area but push out the existing one leaving an industrial area that is like a ghost town. We would also not expect the railway station to be built in such close proximity to a site and that again would stop the development of this industrial area.

We would suggest that the alternative sites which carry much less impact are put forward in the final draft.

Item Question  Council Responses

13 13  

The proposed site at Hartridge Farm Road will have 43 pitches and will provide accommodation to meet the residential needs of Newport’s Gypsy/Traveller population.

With regard to the Celtic Way site, it is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

The location of the Celtic Way is not expected to have any impact on the delivery of the proposed railway station at Coedkernew.
**Item Question** | **Representation Text**
---|---
11 | Thank you very much for the receipt of consultation letter and attached CD in respect of the above Plan.  
  
i) General Comments  
Please note that the area of Caldicot & Wentloog Levels is a Natural Flood Plain and whilst every effort will continue to be made to guard against and to alleviate flooding, no guarantee can be given against the worst effects of abnormal weather and tidal conditions  
In respect of all new development within IOB’s operational area, I would make the following recommendations:  
1. A 7 metre strip of land is to be left clear between the top of bank and any building or obstruction, along both banks of any IDB watercourse. This is necessary so that a watercourse can be maintained with heavy machinery.  
2. Any works must not compromise the stability of the bank or create a gradient of more than 1:20 towards the watercourse.  
3. Provision must be made for the IDB to carry out standard ditch maintenance operations.  
4. Absolutely no modification, culverting or in filling of any ditches /reens/ watercourses within IOB district will be undertaken without a written Land Drainage Consent from the Board.

**Item Question** | **Council Responses**
---|---
13 | The points raised are considered to be covered by paragraph 2.16 of the Revised Deposit LDP. The requirement to consult the IDB on proposed works/developments will ensure the Board’s approval is agreed.
I would also like to inform you that the Board's requirements in respect of surface water disposal are:
Rates for storm water runoff discharged from the site to replicate or achieve a reduction from the 'greenfield' response of the site over a range of storm probabilities, accompanied by the required On-site Storage designed for the 1 in 100 year storm event.
For the range of annual flow rate probabilities, up to and including the 1% annual probability (1 in 100 year storm event) the developed rate of run-off discharged from the site into a Viewed Rhyne or ordinary watercourse shall be no greater than the undeveloped rate of run-off for the same event.
The potential effect of future climate change shall be taken into account by increasing... The rainfall depth by 10% for computing storage volumes.
All in compliance with The Institute of Hydrology Report 124 (IH 124) - Flood estimation for small catchments (1994)
All to the satisfaction of the Engineer to the Board
Caldicot & Wentloog Levels IDB

Document: Revised LDP, p.75

Policy: H15.01

Summary: Objection to the proposed gypsy/traveller site at Celtic Way

Item Question  Representation Text

ii) Proposed Development to Provide Gypsy and Traveller Transit Site in Coedcemew.

The above has been discussed during Full Board Meeting on 15th July 2012 as such on behalf of the Caldicot and Wentlooge Levels,

• Location within IDB’s catchment

As you know the site is immediately adjacent to Board’s operational boundary and well within the catchment; and therefore could adversely affect the IDB operational interests - it could increase the surface water flow in Board’s watercourses and place other land and properties at risk of flooding.

• Location in close proximity to SSSI and associated risks

It is noted by the Board that the site is located just outside Site of Special Scientific Interests - adequate precautions would have to be made to protect invaluable conservation interests consultation with Natural Resources Wales (former Countryside Council for Wales) is therefore strongly recommended.

• Existing Travellers Sites - Board’s experience to date

The Board has already had dealings with similar sites on the Wentlooge Level (within Cardiff City Council’s district) and it is my duty to report that increased fly tipping including dumping dead unregistered horses in reens can be observed in these areas. It is an existing issue from environmental and hydrological point of view: Fly tipped material such as tyres and black bags etc. not only can destroy the protected environment, but also increase the risk of blocked culverts etc. and place land and properties

• Land Drainage Consent

It is not clear how surface water disposal would be disposed from the proposed site. In case of proposed discharge into ordinary watercourse please note that the Proposed Works will require written Land Drainage Consent to be obtained from the Board under the terms of the Land Drainage Act 1991 & Flood and Water Management Act 2010 PRIOR TO ANY WORKS ON-SITE. Under these Acts Internal Drainage Boards have a duty to exercise a general supervision over all matters relating to the drainage of land within their Drainage District. In addition to this, the Caldicot and Wentlooge Levels Internal Drainage Board (in common with many other Boards) has made Byelaws under Section 66 of the Act, to further control works carried out and activities undertaken by others affecting watercourses within its Drainage District. In particular, the Byelaws permit the Board to control the rate of surface water run-off from development sites into the Drainage District.

• Summary of Board’s View on Proposed Development to Provide Gypsy and Traveller Transit Site in Coedcemew:

Based on Board’s experience with similar sites within our operational area, present very high risk of flooding, current state of the sea defences, conservation values and designation of the area, strong voices of objections from local residents (recent public meetings) as well as lack of documented surface water disposal and flood protection strategy for the site, the Board would like to put formal holding objection in respect of the Proposal.

I hope the above clarifies Board’s position.
The provision of a transit site is unlikely to have a significant impact with regard to increasing the risk of flooding.

The proximity to the SSSI is not considered a problem and the issue has not been raised by Natural Resources Wales. These issues are not considered to be significantly different to the previous proposal to allocate the site for employment purposes.

The Council has a duty to provide accommodation for the Gypsy/Traveller population. We do not have a duty to provide land for horses. The site will be owned by the Council and there is no intention to allow the occupants to keep horses on site.

As with any other significant development, the Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.
### Representation Details

**Document:** Revised LDP, p.41  
**Policy:** GP03  
**Summary:** General comments on National Grid

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<td>AMEC Environment &amp; Infrastructure UK</td>
<td>26/07/2013</td>
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National Grid has appointed AMEC to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the current consultation on the above document.

Overview – National Grid

National Grid is a leading international energy infrastructure business. In the UK National Grid’s business includes electricity and gas transmission networks and gas distribution networks as described below.

Electricity Transmission

National Grid, as the holder of a licence to transmit electricity under the Electricity Act 1989, has a statutory duty to develop and maintain an efficient, co-ordinated and economical transmission system of electricity and to facilitate competition in the supply and generation of electricity.

National Grid operates the national electricity transmission network across Great Britain and owns and maintains the network in England and Wales, providing electricity supplies from generating stations to local distribution companies. We do not distribute electricity to individual premises ourselves, but our role in the wholesale market is key to ensuring a reliable and quality supply to all.

National Grid’s high voltage electricity system, which operates at 400,000 and 275,000 volts, is made up of approximately 22,000 pylons with an overhead line route length of 4,500 miles, 420 miles of underground cable and 337 substations. Separate regional companies own and operate the electricity distribution networks that comprise overhead lines and cables at 132,000 volts and below. It is the role of these local distribution companies to distribute electricity to homes and businesses.

To facilitate competition in the supply and generation of electricity, National Grid must offer a connection to any proposed generator, major industry or distribution network operator who wishes to generate electricity or requires a high voltage electricity supply. Often proposals for new electricity projects involve transmission reinforcements remote from the generating site, such as new overhead lines or new development at substations. If there are significant demand increases across a local distribution electricity network area then the local network distribution operator may seek reinforcements at an existing substation or a new grid supply point. In addition National Grid may undertake development works at its existing substations to meet changing patterns of generation and supply.

Gas Transmission

National Grid owns and operates the high pressure gas transmission system in England, Scotland and Wales that consists of approximately 4,300 miles of pipelines and 26 compressor stations connecting to 8 distribution networks. National Grid has a duty to develop and maintain an efficient co-ordinated and economical transmission system for the conveyance of gas and respond to requests for new gas supplies in certain circumstances.

New gas transmission infrastructure developments (pipelines and associated installations) are periodically required to meet increases in demand and changes in patterns of supply. Developments to our network are as a result of specific connection requests e.g. power stations, and requests for additional capacity on our network from gas shippers. Generally network developments to provide supplies to the local gas distribution network are as a result of overall demand growth in a region rather than site specific developments.

Gas Distribution

National Grid also owns and operates approximately 82,000 miles of lower-pressure distribution gas mains in the north west of England, the west Midlands, east of England and north London - almost half of Britain's gas distribution network, delivering gas to around 11 million homes, offices and factories. National Grid does not supply gas, but provides the networks through which it flows. Reinforcements and developments of our local distribution network generally are as a result of overall demand growth in a region rather than site specific developments. A competitive market operates for the connection of new developments.

National Grid and Local Development Plan Documents

The Energy White Paper makes clear that UK energy systems will undergo a significant change over the next 20 years. To meet the goals of the white paper it will be necessary to revise and update much of the UK’s energy infrastructure during this period. There will be a requirement for:

- an expansion of national infrastructure (e.g. overhead power lines, underground cables, extending substations, new gas pipelines and associated installations); and
- new forms of infrastructure (e.g. smaller scale distributed generation, gas storage sites).

Our gas and electricity infrastructure is sited across the country and many stakeholders and communities have an interest in our activities. We believe our long-term success is based on having a constructive and sustainable relationship with our stakeholders. Our transmission pipelines and overhead lines were originally routed in consultation with local planning authorities and designed to avoid major development areas but since installation much development may have taken place near our routes.
We therefore wish to be involved in the preparation, alteration and review of Development Plan Documents (DPDs) which may affect our assets including policies and plans relating to the following issues:

- any policies relating to overhead transmission lines, underground cables or gas pipeline installations;
- site specific allocations/land use policies affecting sites crossed by overhead lines, underground cables or gas transmission pipelines;
- land use policies/development proposed adjacent to existing high voltage electricity substation sites and gas above ground installations;
- any policies relating to the diverting or undergrounding of overhead transmission lines;
- other policies relating to infrastructure or utility provision;
- policies relating to development in the countryside;
- landscape policies; and
- waste and mineral plans.

In addition, we also want to be consulted by developers and local authorities on planning applications, which may affect our assets and are happy to provide pre-application advice. Our aim in this is to ensure that the safe and secure transportation of electricity and gas is not compromised.

National Grid infrastructure within Newport City Council’s administrative area

Electricity Transmission

National Grid’s high voltage electricity overhead transmission lines within Newport City Council’s administrative area that form an essential part of the electricity transmission network in England and Wales include the following:

- XM line 275kV from Cowbridge substation in the Vale of Glamorgan to Whitson substation in Newport.
- XR line 275kV from Uskmouth substation to Whitson substation.
- 4YX line 400kV from Cilfynydd substation in Caerphilly to Whitson substation in Newport to Newhouse substation in Monmouthshire.
- XL line from Whitson substation in Newport to Iron Acton substation in South Gloucestershire.
- SE 33kV line from Whitson substation to Llanwern substation.
- SD 33 kV line from Whitson substation to Llanwern substation.

The following National Grid substations are also located within the administrative area of Newport City Council:

- Imperial Park 400 kV substation
- Uskmouth 275 kV substation
- Whitson 275 kV substation
- Llanwern 33kV substation

National Grid has provided information in relation to electricity transmission assets via the following internet link:

http://www.nationalgrid.com/uk/LandandDevelopment/DDC/GasElectricNW

Electricity Distribution

Western Power Distribution owns and operates the local electricity distribution network in Newport’s administrative area.

Contact details for Western Power Distribution can be found on the Energy Networks website: www.energynetworks.org

General comments noted.
National Grid has identified the following sites as being crossed by National Grid’s high voltage overhead electricity lines:

- EM1 (i) Employment – Duffryn. Crossed by route 4YX.
- EM1 (ii) East of Queensway Meadows, south of Glan Llyn. Crossed by route 4YX.
- EM1(iv) Solutia. Crossed by route 4YX.
- EM2(ii) Llanwern former tipping area, south of Queensway. Crossed by Route SD and Route SE.
- EM3 Newport Docks. Crossed by Route 4YX.
- SP16 (ii) Major Road Schemes – Eastern extension of the southern distributor road. Crossed by Route SE, Route SD, Route XM and Route 4YX.
- W1 (safeguarded waste disposal site) Docksway. Crossed by route 4YX.

National Grid does not own the land over which the overhead lines cross, and it obtains the rights from individual landowners to place our equipment on their land. Potential developers of the sites should be aware that it is National Grid policy to retain our existing overhead lines in-situ. Because of the scale, bulk and cost of the transmission equipment required to operate at 400kV National Grid only supports proposals for the relocation of existing high voltage overhead lines where such proposals directly facilitate a major development or infrastructure project of national importance which has been identified as such by central government. Therefore we advise developers and planning authorities to take into account the location and nature of existing electricity transmission equipment when planning developments.

National Grid prefers that buildings are not built directly beneath its overhead lines. This is for two reasons, the amenity of potential occupiers of properties in the vicinity of lines and because National Grid needs quick and easy access to carry out maintenance of its equipment to ensure that it can be returned to service and be available as part of the national transmission system. Such access can be difficult to obtain without inconveniencing and disturbing occupiers and residents, particularly where properties are in close proximity to overhead lines.

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. To comply with statutory safety clearances the live electricity conductors of National Grid’s overhead power lines are designed to be a minimum height above ground. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid seeks to encourage high quality and well planned development in the vicinity of its high voltage overhead lines. Land beneath and adjacent to the overhead line route should be used to make a positive contribution to the development of the site and can for example be used for nature conservation, open space, landscaping areas or used as a parking court. National Grid, in association with David Lock Associates has produced ‘A Sense of Place’ guidelines, which look at how to create high quality development near overhead lines and offers practical solutions which can assist in avoiding the unnecessary sterilisation of land in the vicinity of high voltage overhead lines.

‘A Sense of Place’ is available from National Grid and can be viewed at:
www.nationalgrid.com/uk/senseofplace

Further information regarding development near overhead lines and substations is available here:
http://www.nationalgrid.com/uk/LandandDevelopment/DDC/devnearohl_final/pdf/brochure.htm
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<td>13</td>
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<td>Noted. Developers will be encouraged to view and comply with National Grid’s guidance as part of the planning application process. The support text for EM1 (i) Duffryn already notes that any developer will also ensure there is no adverse impact on the Imperial Park substation operated by National Grid.</td>
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<td>Document: Revised LDP, p.79</td>
<td>Policy: EM01.02</td>
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<td><strong>Summary:</strong> National Grid electricity lines cross over the site.</td>
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### Representation Details

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Newport City Council Local Development Plan

Filtered to show: (all of) Stage=L; Status=M

by: (No grouping)
Representation Details

by: (No grouping) Filtered to show: (all of) Stage=L; Status=M

Rep'n/Para/Policy     Representor     Agent              Accession No Date Lodged Late?   Source Type    Mode     Status     Status Modified

124.L4/EM01.04 The National Grid AMEC Environment & Infrastructure UK 26/07/2013  E C M

Document:Revised LDP, p.79
Policy: EM01.04
Summary: National grid electricity cables cross the site.

Item Question Representation Text

11 11 Representation Specific Comments National Grid has identified the following sites as being crossed by National Grid’s high voltage overhead electricity lines:

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12/02/2014
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Document: Revised LDP, p. 81
Policy: EM02.02
Summary: National Grid overhead electricity lines cross the site.

Specific Comments
- National Grid has identified the following sites as being crossed by National Grid’s high voltage overhead electricity lines:
  - EM1 (i) Employment – Duffryn. Crossed by route 4YX.
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The Location of high voltage power lines over the eastern and western extensions to the SDR are noted. Site specific issues relating to overhead cables would be considered at the design stage.
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by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M

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Comments noted.

**124.L9/EM01.01** The National Grid AMEC Environment & Infrastructure UK 26/07/2013 E C M

Document: Revised LDP, p.79
Policy: EM01.01
Summary: National grid substation is located on the site.

**Item Question** Representation Text

**11.11** Representation

The following National Grid substation is identified as being located within the following proposed site allocation:

- Imperial Park 400kV substation, located within land allocation EM1 (i) Employment – Duffryn.

While National Grid does not object to future development in the area surrounding the substation site, we would like to take this opportunity to highlight that substations are vital to the efficient operation of our electricity transmission network for switching circuits or transforming voltage. Imperial Park substation is an essential part of the transmission network and has an important role to play in maintaining the supply of electricity to the local distribution network operator and therefore ultimately to homes and businesses throughout Newport City Council and the wider area. The site is therefore "Operational Land" and, for the reasons outlined above, there may need to be further essential utility development at the site in the future.

**Further Advice**
National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. In addition the following publications are available from the National Grid website or by contacting us at the address overleaf:

- National Grid’s commitments when undertaking works in the UK - our stakeholder, community and amenity policy;
- Specification for Safe Working in the Vicinity of National Grid High Pressure Gas Pipelines and Associated Installations - Requirements for Third Parties; and
- A sense of place - design guidelines for development near high voltage overhead lines.

Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure.

**Item Question** Council Responses

**13.13** Council Response

Noted. Developers will be encouraged to view and comply with National Grid’s guidance as part of the planning application process. The support text for EM1 (i) Duffryn already notes that any developer will also ensure there is no adverse impact on the Imperial Park substation operated by National Grid.
Gwent Wildlife Trust supports the inclusion of nature conservation and biodiversity within the identified issues for the LDP, but suggests the following changes for increased clarity:

Protection of heritage - Newport has a rich natural and historic heritage resource which needs to be conserved, used and promoted. This change would encompass the whole of Newport's heritage, and reflects objectives and policies that occur later within the document.

Biodiversity loss - Biodiversity is declining nationally due to a number of factors. Newport has particularly valuable resources, with a rich diversity of habitats of local, national and international importance; the LDP can contribute to reversing biodiversity decline through protecting and enhancing existing resources and creating new habitats.

PPW (2011) states that: 'The planning system has an important part to play in meeting biodiversity objectives by promoting approaches to development which create new opportunities to enhance biodiversity, prevent biodiversity losses, or compensate for losses where damage is unavoidable. Local planning authorities must address biodiversity issues, insofar as they relate to land use planning, in both development plans and development control decisions. The suggested change identifies the issue (biodiversity loss, as opposed to site protection) more clearly, and demonstrates how the LDP can contribute positively to addressing the issue, reflecting national policy.'

Depending on amendments/focused changes, we may wish to speak at a hearing regarding allocations on SSSIs and SINCs.

Council Response
Support and suggested changes noted.

Bearing in mind that the LDP should be read as a whole, it is felt that the suggested changes are unnecessary because the key points are addressed in the general policies.
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<td></td>
<td>22/07/2013</td>
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Document: Revised LDP, p.6, para.1.19  
Policy: Intro & Overview  
Summary: Supports the connection made between health and green space.

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<td>11</td>
<td>Representation</td>
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<td></td>
<td>Gwent Wildlife Trust supports the connection made between health and green space. The LDP also seeks to protect and enhance biodiversity, which will also contribute to this objective.</td>
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<td>Speaking at Public Examination</td>
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**Document:** Revised LDP, p.6, para.1.22  
**Policy:** Intro & Overview  
**Summary:** Require further clarification on Objectives 1 and 2 to locating development in sustainable locations.

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<td>10 10</td>
<td>Soundness Test</td>
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<td>This section fails to meet C2 - it does not comply with national policy.</td>
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**Soundness Test**  
Whilst we support Objectives 1 and 2, we feel they require further explanation and clarification. ‘Sustainable locations’ does not just refer to the reuse of land; PPW Section 4.6 (2011) lists many other considerations such as proximity to sustainable modes of transport and infrastructure, and climate change resilience. Many of these issues are mentioned in the text accompanying Objective 2, but in a context of design rather than location of development. It should be made clear that the LDP can significantly contribute to sustainable development through both location and design of new development. Please also see our comments relating to the ecological value of some brownfield land (1.33).

**Speaking at Public Examination**  
Depending on amendments/focused changes, we may we to speak at a hearing regarding allocations on SSSI s and SINCs.

**Council Response**  
The issue of sustainable development is addressed specifically in Policy SP1 and generally throughout the LDP. In addition, the circumstances of specific sites will be considered during the development-management process.

The supporting text for Objective 1 makes it clear that NCC will focus development on brownfield sites, and Objective 2 makes reference to energy efficiency and travel behaviour, not just design issues.
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<td>Gwent Wildlife Trust strongly supports Objective 6, particularly its inclusiveness. This is in keeping with the Council's duty to have regard for biodiversity under the NERC Act (2006), and PPW Ch5 (2011) which states that development plans should 'provide for the conservation and, where appropriate, enhancement of biodiversity and landscape outside designated areas, in particular identifying opportunities to conserve important local habitats and species, and to safeguard and manage landscape features of major importance for nature conservation or amenity'. Gwent Wildlife Trust also supports the prioritisation of biodiversity protection and enhancement over brownfield status. As TAN 5 (2009) states that 'Where development proposals may affect national or local BAP habitats or species the same principles apply as to locally designated sites' this will allow the protection of sites qualifying as Open Mosaic Habitats on Previously Developed Land (OMH).</td>
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<td>Depending on amendments/focused changes, we may we to speak at a hearing regarding allocations on SSSI s and SINCs.</td>
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**Newport City Council Local Development Plan**

**Representation Details**

Filtered to show: (all of) Stage=L; Status=M

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**by:** (No grouping)  
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**Document:** Revised LDP, p.12, para.1.36  
**Policy:** Objective 09  
**Summary:** Supports the recognition of the contribution biodiversity can have to health and wellbeing

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**Item Question**  
**Representation Text**

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<tbody>
<tr>
<td>11</td>
<td>Representation</td>
<td>Gwent Wildlife Trust supports the recognition of the contribution that biodiversity and access to natural spaces can make to people’s health and wellbeing. We especially welcome the background paper on Environmental Spaces and the Council’s Accessible Natural Greenspace assessment.</td>
</tr>
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<table>
<thead>
<tr>
<th>Item</th>
<th>Question</th>
<th>Council Responses</th>
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<tr>
<td>13</td>
<td>Council Response</td>
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**Speaking at Public Examination**

Depending on amendments/focused changes, we may we to speak at a hearing regarding allocations on SSSIs and SINCs.
### Representation Details

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**Document:** Revised LDP, p.6, para.1.39-41  
**Policy:** Intro & Overview  
**Summary:** Object due to the lack of reference to the Networked Environment Region.

#### Item Question  
**Representation Text**

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| 4    | 4        | A new paragraph or new text  
Paragraph or section number(s) : 1.39-41 (Wales Spatial Plan)  
Yes |
| 10   | Soundness Test  
This section fails to meet C3 - it does not have regard to the Wales Spatial Plan |
| 11   | The concept of a Networked Environment Region is a key feature of the Wales Spatial Plan for the South East Region. This concept involves increasing ecological connectivity and improving access to wildlife and the countryside, both of which feature in the LDP. As the Gwent Levels has been identified as a case study within the Framework for the Networked Environment Region (Welsh Government, CCW, EAW and WEL, 2009), we object to its exclusion from the LDP.  
Suggested addition: The Wales Spatial Plan introduces the concept of the South East Region as a Networked Environment Region. This aims to increase ecological connectivity and promote access to wildlife and the countryside, through multifunctional developments that deliver benefits for both people and biodiversity.  
12 | Speaking at Public Examination  
Depending on amendments/focused changes, we may we to speak at a hearing regarding allocations on SSSIs and SINCs. |

#### Council Response  
**Council Response**

It is felt that the reference to the Welsh Spatial Plan adequately reflects the position of the plan having regard to its strategies. The plan reflects the considerations of improving access to the countryside and wildlife. The inclusion of the Gwent Levels as a project will not be affected by the lack of reference in the plan. Once the research has been undertaken, if further advice or guidance is required, this will be considered. The LDP should not duplicate national planning policy or guidance.
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<th>Question</th>
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<td>Soundness Test</td>
</tr>
<tr>
<td></td>
<td>11</td>
<td>This section fails to meet C2 - it does not comply with national policy.</td>
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**Representation Details**

**Rep’n/Para/Policy** 126.L7//SP01  
**Representor** Gwent Wildlife Trust  
**Date Lodged** 22/07/2013  
**Status** M

**Summary:** Recommend additional wording to provide clarity to policy in regards natural environment.

- **Item Question**: 3  
  **Representation Text**: New Policy

- **Item Question**: 4  
  **Representation Text**: A new paragraph or new text

- **Item Question**: 10  
  **Representation Text**: Soundness Test

- **Item Question**: 11  
  **Representation Text**: This section fails to meet C2 - it does not comply with national policy.

- **Item Question**: 12  
  **Representation Text**: Speaking at Public Examination

- **Item Question**: 13  
  **Representation Text**: Council Response

**Representor** Gwent Wildlife Trust supports the biodiversity and sustainability elements of SP1. We particularly welcome the emphasis on green infrastructure and the view that development can make a positive impact on biodiversity.

We recommend the following change for clarity, as green infrastructure is a part of the natural environment: (ix) protecting and enhancing the built and natural environment including conserving, enhancing and linking green infrastructure.

Whilst the emphasis on the brownfield strategy is positive, we would welcome reiteration of the exclusion of ecologically important brownfield sites from the strategy. Open Mosaic Habitats on Previously Developed Land (OMH) are UKBAP and S42 Priority Habitats, which are strongly protected by TAN 5 (2009), and are excluded from the definition of brownfield land in Planning Policy Wales (2011) (Ch4).

We therefore recommend the following change within the text for clarity: The planning system is primarily concerned with the use of land so one of the key actions that can be taken to achieve sustainable development is to focus on reusing appropriate previously developed land.

Depending on amendments/focused changes, we may we to speak at a hearing regarding allocations on SSSIs and SINCs.

It is considered that the proposed wording does not change the intent of the policy wording. There is no need to reiterate the importance of ecology on greenfield sites as this is clearly set out in the plan. The Plan must not repeat National Policy, therefore the reference to PPW is not deemed appropriate. The assessment as to whether a site is ‘appropriate’ is undertaken as part of the planning process. It is not felt that the addition of this term to the paragraph is necessary.
### Representation Details

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**Document:** Revised LDP, p.18  
**Policy:** SP02

**Summary:** Support policy SP2 but provide wording to reference other green infrastructure

#### Item Question  Representation Text

3  3  New Policy

---

11 11  Representation

Gwent Wildlife Trust welcomes the expansion of this policy and supports the recognition of the contribution that biodiversity and access to natural spaces can make to people’s health and wellbeing. We object to this policy because we are concerned it gives a misleading impression of what green infrastructure actually is. Whilst walking and cycling routes can contribute to green infrastructure, not all do, and green infrastructure is certainly not confined to walking and cycling routes. Green infrastructure encompasses everything from nature reserves and woodlands, to formal parks, street trees, gardens and verges.

We recommend the following change: Development proposals should seek to maximise their positive contribution to health and well being, and minimise any negative effects by being located in the most sustainable locations, close to public transport links and providing efficient walking and cycling routes and other green infrastructure as part of development schemes.

---

12 12  Speaking at Public Examination

Depending on amendments/focused changes, we may we to speak at a hearing regarding allocations on SSSI s and SINC s.

---

#### Item Question  Council Responses

13 13  Council Response

Support noted. It is agreed that the suggested wording relating to Green Infrastructure adds clarity to the policy. Policy wording to be changed to “Development proposals should seek to maximise their positive contribution to health and well-being, and minimise any negative effects by being located in the most sustainable locations, close to public transport links and providing efficient walking and cycling routes and other green infrastructure as part of development schemes.”
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<tr>
<th>Item</th>
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<th>Council Responses</th>
</tr>
</thead>
</table>
| 11   | 11       | **Representation**

Gwent Wildlife Trust supports the conservation of water resources and use of sustainable urban drainage systems (SUDS). Protecting water quality and regulating surface water run-off will significantly contribute to protecting biodiversity and achieving the aims of the EU Water Framework Directive. SUDS can form valuable components of green infrastructure and become havens for wildlife. |

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<th>Question</th>
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| 12   | 12       | **Speaking at Public Examination**

Depending on amendments/focused changes, we may we to speak at a hearing regarding allocations on SSSIs and SINCs. |

Support noted.
### Representation Details

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**Document:** Revised LDP, p.21  
**Policy:** SP05  
**Summary:** Objects to the policy as there is a need to enhance landscape and biodiversity.

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#### Item Question Representation Text

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<td>10</td>
<td>Soundness Test</td>
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</table>

- This section fails to meet C2 - it does not comply with national policy.

11 Representation  
Gwent Wildlife Trust objects to the watering down of this policy. This reason for this amendment is not clear from the summary of representations received. National policy clearly states that the planning system is expecting deliver enhancement as well as protection of biodiversity.

- Planning Policy Wales (2011) states that ‘When considering any development proposal (including on land allocated for development in a development plan) local planning authorities should consider environmental impact, so as to avoid, wherever possible, adverse effects on the environment. Where other material considerations outweigh the potential adverse environmental effects, authorities should seek to minimise those effects and should, where possible, retain and, where practicable, enhance features of conservation importance.’

- TAN 5 (2009) states that ‘The town and country planning system in Wales should: look for development to provide a net benefit for biodiversity conservation with no significant loss of habitats or populations of species, locally or nationally.’

We recommend the following change: Development in the countryside will only be permitted where the use is appropriate in the countryside, respects and where practicable, enhances the landscape character and biodiversity of the immediate and surrounding area and is appropriate in scale and design.

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<th>Item Question</th>
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<tr>
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<td>Speaking at Public Examination</td>
<td>Yes</td>
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</table>

- Depending on amendments/focused changes, we may we to speak at a hearing regarding allocations on SSSIs and SINCs.

---

13 Council Response  
No change. Policy GP5 outlines the general development principles in relation to the natural environment, which includes the requirements in relation to biodiversity impacts and enhancements, the Plan should be read as a whole.
Item Question | Representation Text
---|---
3.3 | New Policy

Soundness Test
This section fails to meet C2 - it does not comply with national policy
The section fails to meet CE1 - It is not consistent with other parts of the plan.

Representation
Gwent Wildlife Trust strongly objects to the limitation of this policy to ‘recognised sites’. As this is a strategic policy, a broad approach is appropriate. The county’s ‘important environmental resources’ are not restricted to designated sites.

For example, the county supports species protected by law and listed in S42 and the local and national BAP, which can be affected by development, but are not restricted to protected sites. Many habitats across the county are listed in S42 and the local and national BAP, and while their presence is not likely to prevent development, the council has an obligation to conserve them. Additionally, there are likely to be sites that qualify for protection but are not yet designated.

Objective 6 very clearly relates to the whole of the natural environment, as does SP1 (ix) and GP5. This policy is therefore inconsistent with other parts of the plan, and does not properly reflect the objective to conserve the natural environment.

All biodiversity in Newport is providing valuable ecosystem services, such as pollution and flood alleviation, and contributing to the health and wellbeing of the local population. It is the whole range of wildlife that provides Newport’s unique setting and supports many aspects of the local economy.

It can be argued that by implying that biodiversity issues are restricted to recognised sites, this policy is misleading for developers. For example, a large number of developments will have the opportunity to provide biodiversity enhancement through landscaping, potentially whilst contributing to other objectives of the plan such as improving health and well-being and water management. Developers may believe that this obligation will only apply to them if their development affects a recognised site, or may believe that enhancement can only be carried out within a recognised site.

It should be noted that the majority of guidance within PPW and TAN5 refers to nature conservation and biodiversity as a whole, rather than specific sites, habitats or species. For example, TAN 5 (2009) states that ‘Biodiversity conservation and enhancement is an integral part of planning for sustainable development. The planning system has an important part to play in nature conservation.’ It also states that ‘The town and country planning system in Wales should: look for development to provide a net benefit for biodiversity conservation with no significant loss of habitats or populations of species, locally or nationally.

We therefore recommend that the original policy is used: The conservation, enhancement and management of the natural, historic and built environment will be sought in all proposals.

Speaking at Public Examination
Depending on amendments/focused changes, we may we to speak at a hearing regarding allocations on SSSIs and SINCs.
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<th>Representation Text</th>
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<tr>
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<td>Gwent Wildlife Trust supports the protection of allotments and community gardens, because these can be valuable for wildlife, and also help people connect with the natural environment.</td>
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<td>13</td>
<td>Council Response</td>
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</table>
Gwent Wildlife Trust supports the inclusion of biodiversity enhancement within transport proposals. Existing verges and embankments can form important wildlife corridors, and new transport routes create opportunities to extend this network. PPW Ch5 (2011) identifies linear features or wildlife corridors as an important part of the Natura 2000 network, and states that development plans should encourage their appropriate management.

Depending on amendments/focused changes, we may we to speak at a hearing regarding allocations on SSSI s and SINCs.

Support noted.
### Representation Details

Document: Revised LDP, p.30
Policy: SP16
Summary: Objects to major road schemes particularly Duffryn Link Road and Queensway.

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10 Soundness Test

This policy does not have regard to national policy (C2), and is contrary to objectives and other policies within the LDP (CE1).
Gwent Wildlife Trust objects to the inclusion of major road schemes, and assumptions and omissions within the accompanying text.

The upgrading of the Queensway has the potential to impact on the Whitson, Nash and Goldcliff SSSIs, because the reens directly adjacent to the road flow through the SSSI. Although the scheme is being undertaken by Welsh Government, it needs to be acknowledged that there are potential impacts, and that these will be addressed.

TAN 5 (2009) states that ‘Local planning authorities, along with other public bodies, have a duty to take reasonable steps, consistent with the proper exercise of their functions, to further the conservation and enhancement of the features by reason of which SSSIs are of special scientific interest’. We therefore welcome reference to GP5, but consider that the LDP could draw attention to the opportunities associated with the development of the Queensway and Glan Llyn to enhance the SSSI as well as protect it.

We object to the inclusion of the Duffryn Link road. The impacts of this scheme have not been assessed in line with recent policy, and alternatives have not been considered. Not only does the road cross the Percoed Reen, it is almost entirely within the St Brides SSSI, crosses five reens in total, and the River Ebbw, a SINC. The potential for negative impacts is very high. PPW Ch5 (2011) states that ‘There is a presumption against development likely to damage a SSSI.’ This is also contrary to TAN 5 (2009) which states that development plans should ‘Make proposals for necessary new development in ways and at locations that are consistent with the nature conservation objectives and policies in the plan itself and with national planning policies.’ This development would be contrary to national policy and SP1, SP9, GP5 and CE12.

Should there be no feasible alternative to the route, proposed, a developer will have many environmental issues to consider, namely:
- Impacts on the features of the Severn Estuary SAC, SPA and Ramsar
- Impacts on the features of the Usk SAC
- Impacts on the features of the SSSI
- Impacts on the River Ebbw SINC
- Impacts on a UKBAP/S42 habitat – Floodplain and Coastal Grazing Marsh

It is misleading to focus on the Percoed Reen, because all reens have the potential to be used by commuting otters. The 5m retained bankside, as far as we are aware, is an access requirement for reen maintenance – it should be explicit that there will be additional measures needed to avoid or mitigate the impacts on otters. For example, current guidance recommends a buffer of 30m to avoid disturbing an otter holt (Disturbance and protected species: understanding and applying the law in England and Wales - A view from Natural England and the Countryside Council for Wales 2007). This work will almost certainly require a HRA and licenses from CCW, and they are likely to judge the mitigation and compensation requirements on a case by case basis.

TAN 5 (2009) states that ‘Where relevant, local development plans should include policies that:
- Draw attention to the legal procedures that would apply to developments likely to have a significant effect on an internationally designated site and refer to the sites shown on the proposals map;
- Safeguard nationally and locally designated sites whilst making clear the relative weight to be attached to the different designations;’

If the scheme remains within the LDP, this information needs to be included.

It should also be noted that the Llanwern North-South link is in close proximity to the Monks Ditch SINC. Cross reference to policies GP5 and CE9 would provide clarity for developers.

Depending on amendments/focused changes, we may we to speak at a hearing regarding allocations on SSSIs and SINCs.
The Queensway Link has been completed. The Duffryn Link will serve a similar function in the west to the Queensway route in the east, providing relief for the M4, including Junction 28 (Tredegar Park), at times of peak congestion and for incident management. The road also serves the major employment areas of south west Newport and the proposed railway station at Coedkernew, again providing opportunities for park and ride. The SDR extension proposals are one of the consulted upon M4 relief Road options. They are economically crucial to the growth of Newport. Therefore it is considered appropriate to retain the allocation for the road within the Local Development Plan.

The Plan is to be read as a whole and the need for developers to take into account the ecological sensitivities of site are clear. Therefore it is deemed not necessary to provide more text to the North South Link proposal or Duffryn Link.
Representations: Gwent Wildlife Trust objects to allocations on SSSI s and SINCs. These sites have been allocated for their nature conservation interest, so it is not compliant with national policy or other LDP policies to allocate them for development. Allocations should be amended to exclude SSSIs and SINCs. Please see our detailed comments relating to EM1.

PPW Ch5 (2011) states that ‘the Wildlife and Countryside Act, as amended by the Countryside and Rights of Way Act 2000, places a duty on all public bodies (including local planning authorities) to take reasonable steps, consistent with the proper exercise of their functions, to further the conservation and enhancement of the features by reason of which a SSSI is of special interest. SSSIs can be damaged by developments within or adjacent to their boundaries, and in some cases, by development some distance away. There is a presumption against development likely to damage a SSSI.’

TAN 5 2009 states that development plans should:

- Safeguard nationally and locally designated sites whilst making clear the relative weight to be attached to the different designations;
- Encourage the conservation and management of features of the landscape of major importance for wild flora and fauna;
- Give local expression to the protection, and where possible enhancement, of species and their habitats, especially those with legal protection and those of principal importance for biodiversity conservation in Wales’

Errata: reference to Paragraph 2.55, possibly intended to read 3.24.

Depending on amendments/focused changes, we may to speak at a hearing regarding allocations on SSSIs and SINCs.
Large areas of employment land which fell within SSSIs/SINCs have been removed from the Plan. However, some areas still exist. The Council has to strike a balance between promoting economic growth and preserving environmental landscapes and this is what we believe has been achieved. With regard to employment land allocations still within SSSI, the Council will expect developers to provide sufficient mitigation to minimise the disruption to flora and fauna in these areas. This is clearly set out within the Plan.

The allocation of employment land in EM2 is not necessarily new net employment land. For example, Crindau and Llanwern Former Tipping Area already have industry located on them. The areas are considered to detract from the local environment and therefore in need of regeneration. Therefore regeneration proposals which come forward would not be generating net additional employment land. They would be replacing what’s already there with more modern business facilities with would regenerate the area. As a result, the noted ‘over provision’ of employment land is not as significant as the representation reports.

The largest area of remaining SSSI is within the EM1 Duffryn allocation. This area is part of a Welsh Government draft masterplan that is being prepared and will encourage employment to the area. A significant proportion of this SSSI is already occupied by a waste water treatment works and a National Grid substation.
## Representation Details

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<th>Agent</th>
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<th>Date Lodged</th>
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**Document:** Revised LDP, p.39  
**Policy:** GP01

**Summary:** Suggest amended wording to Policy GP5 to provide a definition of Green Infrastructure.

### Item Question  
**Representation Text**

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<td>4.4</td>
<td>A new paragraph or new text</td>
<td>Yes</td>
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Gwent Wildlife Trust supports measures to reduce greenhouse gas emissions and address the impacts of climate change, and welcomes the inclusion of green infrastructure within the supporting text. Green infrastructure, as mentioned, can have a wide range of benefits, and can also help wildlife adapt to climate change. However, green infrastructure is not limited to green/brown roofs and walls – it includes everything from street trees to roadside verges as well as formal and informal green spaces. We include brown roofs, as these are more often designed to encourage wildlife (green roofs can be monocultures), often replacing post-industrial habitats.

This is supported by TAN 5 which states that development plans should include policies that ‘Provide for the conservation, enhancement, sustainable management and, where appropriate, the restoration of networks of natural habitats including wildlife corridors and other green space, and networks and chains of open space’. The area of parks and green spaces per 1000 population is a Welsh quality of life indicator, and improving access to natural greenspace is an objective within the Wales Environment Strategy and Welsh Government Strategy for Sport and Physical Activity.

Whilst GP5 does promote green infrastructure, and we would welcome cross reference to GP5 within the text, GP5 and the accompanying text does not explain what green infrastructure is, nor what the many benefits are.

Suggested addition: Green infrastructure, such as green/brown roofs, green walls and green spaces can provide social and economic benefits as they help to soften the urban environs; mitigate for the urban heat island effect; filter airborne and gaseous pollutants; help to absorb noise pollution; provide a public amenity / green space; and are aesthetically pleasing. Green/brown roofs and walls also benefit the sustainability of the building itself by helping to regulate internal building temperatures and recycle rainwater. In addition green walls and roofs can also pave the way for biodiversity in buildings and provide a valuable part of a wider SUDs scheme. Green infrastructure can contribute to more innovative and attractive design scheme, which will help our environment adapt to the impacts of climate change, as well as helping to mitigate the causes.

### Speaking at Public Examination

Depending on amendments/focused changes, we may we to speak at a hearing regarding allocations on SSSI and SINC.

### Item Question  
**Council Responses**

<table>
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<th>Question</th>
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<tr>
<td>13</td>
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<td>The definition of ‘green infrastructure’ in the glossary is considered sufficient.</td>
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### Representation Details

**by:** (No grouping)  
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**Document:** Revised LDP, p.43  
**Policy:** GP05  
**Summary:** Support the policy in part but object to lack of principle of net benefit for biodiversity, provide wording for clarification purposes

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This policy does not have regard to national policy (C2).
Whilst Gwent Wildlife Trust strongly supports the principles behind Policy GE5, we object to the disparity with national policy, particularly with regard to the precautionary principle, and the objective of TAN 5 to provide net benefit for biodiversity.

We support part i) as it emphasises the positive contribution that development can make towards national and local nature conservation plans. We suggest the following amendment for clarity: The proposals are designed and managed to protect and encourage biodiversity and ecological connectivity, including the incorporation of existing and new features on or off the site ... This inclusion of existing features reflects the mitigation hierarchy (TAN 5 2009, section 2.4), as utilising and retaining existing features is both better for wildlife and often more cost effective for developers.

Whilst we welcome the inclusion of compensation, we object to the lack of the principle of 'net benefit for biodiversity' listed in TAN 5 (2009): 'The town and country planning system in Wales should ...look for development to provide a net benefit for biodiversity with no significant loss of habitats or populations of species, locally or nationally'. This is stronger than the principle of 'no net loss' stated in the text, and again emphasises the positive contribution that development can make to biodiversity. ‘Significant adverse impact’ is subjective and open to interpretation, so without specifying a limit as to what is acceptable within the policy text, developers will be unaware as to what level of mitigation/compensation may be needed. We also recommend explaining terminology, particularly 'features of importance for nature conservation'.

We suggest the following amendment to part ii) The proposals demonstrate how they ... on biodiversity and features of importance for nature conservation; ensuring that there are no significant adverse effects on areas of nature conservation interest including international, European, national, Welsh Section 42 and local protected habitats and species and protecting features of importance for ecology, thus providing a net benefit for biodiversity.

Terms can be explained within the text for clarity:
'Features of importance for nature conservation' are features for which sites are designated, and features of the landscape which provide wildlife corridors, links or stepping stones, such as rivers with their banks, hedgerows, small woodlands and ponds. (TAN 5 2009 section 3.2.2).

The precautionary principle is only mentioned with respect to European protected sites. This is listed as a principle of sustainable development in TAN 5 (2009), which states that 'Where relevant, local development plans should include policies that ... Apply the precautionary principle where appropriate' – and these principles apply to all development. As the county includes many complicated natural systems, including many beyond European sites, and the impacts of development are often difficult to predict, this is particularly important.

We recommend that the precautionary principle is included in paragraph 3.21: Where the impacts of development on nature conservation interests are difficult to determine, the precautionary principle will be applied.

Paragraph 3.26 should be amended accordingly: This plan aims to achieve the protection and enhancement of habitats and species, especially those identified as being of national or local importance (identified in the UK Biodiversity Action Plan and the Newport Local Biodiversity Action Plan) and to provide a net benefit to biodiversity. Newport City Council has a duty under the Natural Environment and Rural Communities Act (2006) to have regard to the purpose of conserving biodiversity.

We are supportive of measures within the text to promote protection of water resources, trees and the landscape. We also welcome the recognition of the contribution that development can make to nature conservation and green infrastructure through sensitive landscaping. However, we are concerned that green infrastructure is not defined for developers, and the numerous benefits of green infrastructure are not explained. Please see comments relating to GP1.

Depending on amendments/focused changes, we may we to speak at a hearing regarding allocations on SSSIs and SINCs.
It is considered that the proposed amendment would make the policy verbose.

Lack of principle of ‘net benefit for biodiversity’ — criterion i) states that proposals ought to be designed and managed to ‘protect and encourage’ biodiversity — arguably, this says the same thing.

Subjective nature of ‘significant adverse impact’ — such judgements are always subjective in planning, and it is not practical to prescribe levels/thresholds for hypothetical proposals (every site must be assessed on its own merits).

Definition of ‘features of importance for nature conservation’ — this is covered throughout the LDP and in national policy, so there is no need to alter this particular policy.

Precautionary principle — suggested that ‘Where the impacts of development on natural conservation are difficult to determine, the precautionary principle will be applied.’ This seems to suggest taking a negative approach to proposals even where there is no evidence of adverse effects. NCC will consider adding a reference to the precautionary principle in the supporting text (paragraph 3.12). That way, developers will be aware of the approach required by national policy.

Suggested amendment to 3.26 — it is felt that GP5 and the supporting text make the council’s approach (and obligations under national policy) quite clear.

**Document:** Revised LDP, p.50

**Policy:** CE01

**Summary:** Supports the measure to protect open spaces, countryside and landscapes.

**Representation**

Gwent Wildlife Trust supports measures to protect open spaces, the countryside and landscape.

**Speaking at Public Examination**

Depending on amendments/focused changes, we may we to speak at a hearing regarding allocations on SSSIs and SINCs.

**Council Response**

Support noted.
**Representation Details**

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**Document:** Revised LDP, p.50  
**Policy:** CE02  
**Summary:** Welcomes the recognition of the importance of wildlife corridors.

**Item Question**  
**Representation Text**

11  
**Representation**

Gwent Wildlife Trust welcomes the recognition of the importance of wildlife corridors alongside major transport routes, and supports the enhancement of these corridors.

12  
**Speaking at Public Examination**

Depending on amendments/focused changes, we may we to speak at a hearing regarding allocations on SSSIs and SINCs.

**Council Responses**

13  
**Council Response**

Noted.
**Representation Details**

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Document: Revised LDP, p.51  
Policy: CE03

**Summary:** Propose reference to designation of river as SAC to provide clarity to developers.

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**Soundness Test**

The section fails to meet CE1 - it is not consistent with other parts of the plan.

Gwent Wildlife Trust recommends mention of the nature conservation importance of the River Usk and its status as a SAC within the text, so that developers are aware that riverfront development is likely to require HRA. If this is considered to be adequately stated elsewhere in the plan (e.g. GP5 and paragraph 3.23), this should be cross referenced.

**Speaking at Public Examination**

Depending on amendments/focused changes, we may we to speak at a hearing regarding allocations on SSSI s and SINCs.

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<td>Council Response</td>
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Reference to the special features of the River Usk are made elsewhere in the Plan, the Plan should be read as a whole.
**Representation Details**

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Document: Revised LDP, p.54
Policy: CE05

**Summary:** Support the protection of local environmental spaces proposed wording to reference to policy GP5.

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**Soundness Test**

The section fails to meet CE1 - it is not consistent with other parts of the plan.

**Representation**

Gwent Wildlife Trust strongly supports protection of local environmental spaces. We welcome recognition of their many functions (ie provision of multiple ecosystem services) and support the efforts made by the council to increase access to natural greenspace through the CCW ANG Toolkit. We welcome the additional protection that this gives to many urban SINCs.

Whilst we generally welcome community food production schemes, developers should be aware that these schemes will only be acceptable if they do not impact on the nature conservation interest of the site, in order to comply with policy GP5. Without reference to biodiversity protection, the council appears to be advocating development of Environmental Spaces, some of which are designated for their nature conservation interest, which would be contrary to the NERC duty and other policies within the LDP. We recommend amending paragraph 4.14 or cross reference to GP5:

Proposals for local food/plant production on environmental spaces will be supported provided that they comply with other relevant council policies and that the proposed development would enhance the social and environmental amenities and economic well being of the neighbourhood and the proposal will be used by nearby residents.

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Depending on amendments/focused changes, we may we to speak at a hearing regarding allocations on SSSI s and SINCs.

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<td>Council Response</td>
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Support noted. Developments would be required to take into account policies within the Plan as a whole. The supporting text (para. 4.15) references the need to establish the suitability of the land for such developments.
Document: Revised LDP, p.58
Policy: CE09

Summary: Object to omission of objective from national policy and suggest amended wording.

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<td>4 4</td>
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This policy does not have regard to national policy (C2).

11 11 Representation

Gwent Wildlife Trust supports the protection of local wildlife sites. However, we object to the omission of the objective of TAN 5 (2009) to achieve a net benefit to biodiversity: 'The town and country planning system in Wales should ...look for development to provide a net benefit for biodiversity with no significant loss of habitats or populations of species, locally or nationally'.

We recommend that the policy is amended to reflect this:

i) There would be no overall loss of the nature conservation resource for which the site has been designated, and the development delivers a net biodiversity benefit.

We would also welcome further clarification of 'green corridors/ecological networks', such as using the definition of ecological features in TAN 5 section 3.2.2.

12 12 Speaking at Public Examination

Depending on amendments/focused changes, we may we to speak at a hearing regarding allocations on SSSI's and SINCs.

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<td>13 13</td>
<td>Council Response</td>
<td>It is considered that the policy wording adequately protects those recognised locally designated sites. Adding 'and the development delivers a net biodiversity benefit' is considered overly onerous.</td>
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Document: Revised LDP, p.60
Policy: CE10
Summary: Support of protection and extension of Coastal Zone

**Representation Details**

**Item Question**  
1. **Representation**
   - Gwent Wildlife Trust supports the protection and extension of the Coastal Zone, and welcomes recognition of the special features of the Gwent Levels.
   
2. **Speaking at Public Examination**
   - Depending on amendments/focused changes, we may we to speak at a hearing regarding allocations on SSSIs and SINCs.

**Council Responses**

1. **Council Response**
   - Support noted.

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Document: Revised LDP, p.62
Policy: CE11
Summary: Supports policy CE11 in particular the protection of the special qualities of the Gwent Levels.

**Representation Details**

**Item Question**  
1. **Representation**
   - Gwent Wildlife Trust strongly supports policy that encourages renewable energy whilst protecting nature conservation interests. We particularly welcome the protection of the special qualities of the Gwent Levels.
   
2. **Speaking at Public Examination**
   - Depending on amendments/focused changes, we may we to speak at a hearing regarding allocations on SSSIs and SINCs.

**Council Responses**

1. **Council Response**
   - Support noted.
Gwent Wildlife Trust welcomes the recognition that several of the new housing allocations will need to include special measures to protect the River Usk SAC. It should also be noted that several of these allocations have the potential to affect SINCs and UKBAP habitats, and should take appropriate steps to protect these nature conservation interests.

We object to the allocation of H56 Woodland Site, Ringland. The development of land encircled by the adjoining SINC would cause significant negative impacts to the nature conservation interest, and therefore be contrary to SP1, SP9, GP5 and CE12 and TAN 5 (2009), which states that development plans should ‘Make proposals for necessary new development in ways and at locations that are consistent with the nature conservation objectives and policies in the plan itself and with national planning policies.’

The SINC is ancient semi-natural woodland (ASNW), which is sensitive to disturbance. Planning Policy Wales (2011) states that ‘Local planning authorities should seek to protect trees, groups of trees and areas of woodland where they have natural heritage value or contribute to the character or amenity of a particular locality. Ancient and semi-natural woodlands are irreplaceable habitats of high biodiversity value which should be protected from development that would result in significant damage.’ For this reason, the Woodland Trust recommends a buffer of at least 15m.

The boundary for the site should be redrawn to exclude the small area surrounded by SINC, and provide an appropriate buffer for the SINC.

Depending on amendments/focused changes, we may we to speak at a hearing regarding allocations on SSSI s and SINCs.

Council Response

Noted. The Plan is to be read as a whole and therefore it is not necessary to repeat policy intent. It is considered that policy GP5 provides adequate cover as to the requirements of developers to ensure they consider their impact on ecology. Reference to specific impacts on the River Usk SAC are set out in the Plan as required by the Habitat Regulations Assessment work undertaken on the Plan.

The woodland site is located within the settlement boundary. The site is part of the disposal programme for the Council and as such the allocation reflects Council’s intention to dispose of the land for future development. Adequate buffers will be needed to protect the surrounding woodland, but this can be secured at the application stage.
### Representation Details

**Document:** Revised LDP, p.73  
**Policy:** H10

**Summary:** Support the protection of species affected by agricultural conversions.

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<td>Gwent Wildlife Trust supports the protection of species affected by agricultural building conversions.</td>
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| 12   | 12       | Speaking at Public Examination  
Depending on amendments/focused changes, we may we to speak at a hearing regarding allocations on SSSIs and SINC's. |

**Council Responses**

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Support noted. |
**Representation Details**

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Document: Revised LDP, p.79
Policy: EM01
Summary: Objects to remaining allocations with SSSI area

Item | Question | Representation Text | Soundness Test
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3 | 3 | New Policy | This policy does not have regard to national policy (C2), and is contrary to objectives and other policies within the LDP (CE1).
4 | 4 | A new paragraph or new text | Yes
6 | 6 | Amend the boundaries of an existing site | Yes
7 | 7 | Delete an existing site | |
10 | 10 | Soundness Test | |
Whilst we welcome the reduction in employment allocations on designated sites, Gwent Wildlife Trust strongly objects to the remaining employment allocations on sites designated for their nature conservation interest - SSSIs and SINCs. Duffryn and Gwent Europark include land designated as SSSI, and Solutia includes land designated as SINC.

Outlining the principles of sustainable development within planning policy PPW Ch4 (2011) includes ‘respect for environmental limits, so that resources are not irrecoverably depleted or the environment irreversibly damaged. This means, for example, mitigating climate change, protecting and enhancing biodiversity, minimising harmful emissions, and promoting sustainable use of natural resources’.

A key objective within PPW Ch4 (2011) for the planning system to: Contribute to the protection and improvement of the environment, so as to improve the quality of life, and protect local and global ecosystems. In particular, planning should seek to ensure that development does not produce irreversible harmful effects on the natural environment and support measures that allow the natural heritage to adapt to the effects of climate change. The conservation and enhancement of statutorily designated areas and of the countryside and undeveloped coast; the conservation of biodiversity, habitats, and landscapes; the conservation of the best and most versatile agricultural land; and enhancement of the urban environment all need to be promoted’. Allocating development on statutory sites is likely to produce irreversible harmful effects, and does not contribute to their conservation or enhancement in any way.

PPW CH5 (2011) states that ‘With regard to SSSIs, which are of national importance, the Wildlife and Countryside Act, as amended by the Countryside and Rights of Way Act 2000, places a duty on all public bodies (including local planning authorities) to take reasonable steps, consistent with the proper exercise of their functions, to further the conservation and enhancement of the features by reason of which a SSSI is of special interest. SSSIs can be damaged by developments within or adjacent to their boundaries, and in some cases, by development some distance away. There is a presumption against development likely to damage a SSSI.’

When we objected to the allocation of these sites in previous stages, the council response was that ‘On the Gwent Levels, the features of importance are the reens, and it is possible to develop while protecting the reens, as has been done’ (Preferred Strategy Consultation Report). This is incorrect on both counts. Whilst the SSSI is designated for the reen interest, this is by no means the only feature of importance on the Gwent Levels. The area supports numerous protected species BAP species and S42 species, and is a UKBAP habitat ( accorded equivalent status to a locally designated site by TAN 5) in addition to its landscape and historic status. It is also of significant value in terms of ecosystem service delivery - providing air and water regulation, flood alleviation and recreation and tourism services, to name a few. Former development on the SSSI has impacted negatively on the reens, as well as the other wildlife of the Gwent Levels. There have been severe pollution incidents, as well as significant losses of terrestrial habitat and ecological connectivity. We have yet to see proof in the form of post-construction monitoring that demonstrates that development does not impact negatively on nature conservation interests.

This is supported by the conclusions of the Sustainability Appraisal, which states that ‘It is regarded, however, that effects on biodiversity are still likely to be significant in the long term, given the scale of the proposed development and potential cumulative effects.’

With respect to SINCs, TAN 5 (2009) states that ‘The conservation and enhancement of locally designated sites is an important contribution to the implementation of Biodiversity Action Plans and to the management of features of the landscape of major importance for wild flora and fauna. Developers should avoid harm to those interests where possible. ’ It also states that development plans should include policies that ‘Protect locally designated sites of demonstrably substantive nature conservation value’. Allocating these sites for development will not protect them, and does not respect the first principle of avoidance.

TAN 5 (2009), states that development plans should ‘Make proposals for necessary new development in ways and at locations that are consistent with the nature conservation objectives and policies in the plan itself and with national planning policies’. Development of these sites is therefore inconsistent with national policy and SP1, SP9, GP5 and CE12.

Furthermore, the minimum requirement of employment land within the plan period is predicted at 35ha. The current employment allocation is 168ha, but additionally, a further 270ha is allocated for regeneration under EM2, over half of which is expected to be for employment, and the Newport Docks area is also allocated for existing and potential employment. We estimate that the total allocation of employment land is actually well above 330ha. Removing or amending all of the allocations to avoid nationally designated sites would remove just 36ha, removing both national and local sites would remove a total of 81ha. Removing these allocations (which are very constrained anyway) would leave a total of well above 250ha – over seven times the predicted need, and thus allowing flexibility and choice for developers.

In the unlikely event that an employment opportunity arose of such a scale and degree of importance that it necessitated destroying part of a nationally important site (and overriding the Welsh Government’s central organising principle of sustainable development); this could be addressed through a departure from the plan.

In conclusion, employment allocations on SSSIs and SINCs represent an over allocation which is contrary to principles of sustainable development, national policy and LDP policy. Allocations should
aim to direct development to sustainable locations; therefore these sites should be amended or deleted to avoid national and local designated sites.
If these sites persist within the LDP, we expect the policy itself to be amended to ensure protection of designated sites, as in the original deposit. This should include reference to the development being of overriding importance, consideration of alternatives, and the achievability of successful mitigation.

12 12 Speaking at Public Examination

Depending on amendments/focused changes, we may we to speak at a hearing regarding allocations on SSSIs and SINCs.

13 13 Council Response

Large areas of employment land which fell within SSSIs/SINCs have been removed from the Plan. However, some areas still exist. The Council has to strike a balance between promoting economic growth and preserving environmental landscapes and this is what we believe has been achieved. With regard to employment land allocations still within SSSI, the Council will expect developers to provide sufficient mitigation to minimise the disruption to flora and fauna in these areas. This is clearly set out within the Plan.

The allocation of employment land in EM2 is not necessarily new net employment land. For example, Crindau and Llanwern Former Tipping Area already have industry located on them. The areas are considered to detract from the local environment and therefore in need of regeneration. Therefore regeneration proposals which come forward would not be generating net additional employment land. They would be replacing what’s already there with more modern business facilities with would regenerate the area. As a result, the noted ‘over provision’ of employment land is not as significant as the representation reports.

The largest area of remaining SSSI is within the EM1 Duffryn allocation. This area is part of a Welsh Government draft masterplan that is being prepared and will encourage employment to the area. A significant proportion of this SSSI is already occupied by a waste water treatment works and a National Grid substation.
### Representation Details

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**Document:** Revised LDP, p.81  
**Policy:** EM02  
**Summary:** Object to lack of reference to nature conservation within policy EM2.

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<th>Representation Text</th>
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<tbody>
<tr>
<td>4</td>
<td>A new paragraph or new text</td>
<td></td>
</tr>
<tr>
<td>11</td>
<td>Gwent Wildlife Trust objects to the lack of reference to nature conservation with regard to regeneration allocations. Several of these sites have the potential to have negative impacts on European sites (iv, v, vii), SSSIs (ii) and SINCs (ii, vii, x). This should be highlighted within the supporting text, with reference made to GP5.</td>
<td></td>
</tr>
<tr>
<td>12</td>
<td>Depending on amendments/focused changes, we may we to speak at a hearing regarding allocations on SSSIs and SINCs.</td>
<td></td>
</tr>
</tbody>
</table>

**Council Response**

It is considered that Policy GP5 provides sufficient protection and does not need to be repeated for individual sites.
### Representation Details

**Document: Revised LDP, p.86**  
Policy: T01  
**Summary:** Objects to the allocation of a railway station at Coedkernew.

<table>
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<tr>
<th>Item</th>
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<th>Representation Text</th>
<th>Soundness Test</th>
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<td>3</td>
<td>New Policy</td>
<td>Yes</td>
</tr>
<tr>
<td>4</td>
<td>4</td>
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<td>Yes</td>
</tr>
<tr>
<td>7</td>
<td>7</td>
<td>Delete an existing site</td>
<td>Yes</td>
</tr>
<tr>
<td>10</td>
<td>10</td>
<td>Soundness Test</td>
<td></td>
</tr>
</tbody>
</table>

**Soundness Test:**  
This policy does not have regard to national policy (C2), and is contrary to objectives and other policies within the LDP (CE1).
Representation Details

**Gwent Wildlife Trust objects to the allocation of a new railway station at Coedcernew.** Whilst we are generally supportive of the other measures within this section to improve transport integration and provide more public transport services, a new station at Coedcernew seems unjustified and would be environmentally damaging.

The location is not close to a populated area, and much of the adjacent employment site remains vacant. We question whether enough analysis has been carried out to determine whether the predicted use of a station at this site justifies the negative impacts on the nature conservation interests and landscape, and the increased use of roads in the local area.

The site is within the St Brides SSSI. PPW CH5 (2011) states that ‘With regard to SSSIs, which are of national importance, the Wildlife and Countryside Act, as amended by the Countryside and Rights of Way Act 2000, places a duty on all public bodies (including local planning authorities) to take reasonable steps, consistent with the proper exercise of their functions, to further the conservation and enhancement of the features by reason of which a SSSI is of special interest. SSSIs can be damaged by developments within or adjacent to their boundaries, and in some cases, by development some distance away. There is a presumption against development likely to damage a SSSI.’ The allocation is therefore contrary to national policy, and LDP policies SP1, SP9 and GP5.

We accept that as the development is a part of the Regional Transport Plan, it is likely to remain within the LDP. The impacts on the SSSI and potentially on the SAC should therefore be noted. It is misleading to focus on the Percoed reen, as there are many potential environmental impacts that require consideration, namely:

- Impacts on the features of the Severn Estuary SAC, SPA and Ramsar
- Impacts on the features of the Usk SAC
- Impacts on the features of the SSSI
- Impacts on the River Ebbw SINC
- Impacts on a UKBAP/S42 habitat – Floodplain and Coastal Grazing Marsh

It is should be noted that this site could impact several reens, all of which have the potential to be used by commuting otters. The 5m retained bankside, as far as we are aware, is an access requirement for reen maintenance – it should be explicit that there will be additional measures needed to avoid or mitigate the impacts on otters. For example, current guidance recommends a buffer of 30m to avoid disturbing an otter holt (Disturbance and protected species: understanding and applying the law in England and Wales - A view from Natural England and the Countryside Council for Wales 2007). This work will almost certainly require a HRA and licenses from CCW, and they are likely to judge the mitigation and compensation requirements on a case by case basis.

If the allocation remains within the LDP, reference to potential impacts on biodiversity should be made within the text, particularly cross reference to GP5.

Errata: reference to Paragraph 2.55, possibly intended to read 2.56.

---

**Speaking at Public Examination**

Depending on amendments/focused changes, we may we to speak at a hearing regarding allocations on SSSIs and SINCs.

---

**Council Response**

The site is proposed as part of the Regional Transport Plan to serve east Newport and the Coedkernew Industrial/Business area. Section 7.9 of Policy T1 outlines the steps to be taken to mitigate the impact upon Percoed Reen. Furthermore Policy GP5 Section 3.23 states that developers must demonstrate the case for development, and that any development will be closely scrutinysed for any direct or indirect effects on SSSIs. The Coedkernew station allocation should remain in the LDP as it forms part of the Regional Transport Plan, and Policy GP5 ensures that any proposals have to demonstrate how they avoid and mitigate negative impacts on areas of nature conservation.

Erratum in respect of paragraphs 2.56 and 7.9 shall be corrected.
<table>
<thead>
<tr>
<th>Representation Details</th>
<th>Newport City Council Local Development Plan</th>
</tr>
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<tbody>
<tr>
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<tr>
<td>126.L30//T05</td>
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<td>Document: Revised LDP, p.89</td>
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<tr>
<td>Policy: T05</td>
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<tr>
<td>Summary: Support policy T5.</td>
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<tr>
<td>11 11  Representation</td>
<td>Gwent Wildlife Trust supports policies to protect walking and cycling routes, and the public rights of way network, including the Wales Coastal Path. We welcome development and extension of these routes, especially their connection to the green infrastructure network.</td>
</tr>
<tr>
<td>12 12  Speaking at Public Examination</td>
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<tr>
<td>Depending on amendments/focused changes, we may we to speak at a hearing regarding allocations on SSSIs and SINC.</td>
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<tr>
<td>Item Question  Council Responses</td>
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</tr>
<tr>
<td>13 13  Council Response</td>
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<td>Support noted.</td>
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</table>

| 126.L31//T06           | Gwent Wildlife Trust                      |                           | 22/07/2013      |          | E          | S        | I         | M          |
| Document: Revised LDP, p.89 |
| Policy: T06            |
| Summary: Support Policy T6. |
| 11 11  Representation   | Gwent Wildlife Trust supports policies to protect walking and cycling routes, and the public rights of way network, including the Wales Coastal Path. We welcome development and extension of these routes, especially their connection to the green infrastructure network. |
| 12 12  Speaking at Public Examination | Yes |
| Depending on amendments/focused changes, we may we to speak at a hearing regarding allocations on SSSIs and SINC. |
| Item Question  Council Responses |
| 13 13  Council Response |
| Support noted. |

12/02/2014
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**Document:** Revised LDP, p.90  
**Policy:** T08

**Summary:** Support policy T8.

#### Item Question  Representation Text

**11**  
**11**  
**Representation**

Gwent Wildlife Trust supports policies to protect walking and cycling routes, and the public rights of way network, including the Wales Coastal Path. We welcome development and extension of these routes, especially their connection to the green infrastructure network.

#### Speaking at Public Examination

**12**  
**Yes**  
Depending on amendments/focused changes, we may we to speak at a hearing regarding allocations on SSSI s and SINC s.

---

### Item Question  Council Responses

**13**

**Council Response**

Support noted.

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### Representation Details

**by:** (No grouping)  
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**Document:** Revised LDP, p.106  
**Policy:** CF03

**Summary:** Support policy CF3, note that is it is usually the naturalness of an area that attracts people.

#### Item Question  Representation Text

**11**  
**11**  
**Representation**

Gwent Wildlife Trust supports mention of nature conservation interests with respect to water-based recreation and riverside development. It should be noted that it is often the naturalness and biodiversity associated with waterways and rivers that makes the environment attractive for recreation and leisure.

#### Speaking at Public Examination

**12**  
**Yes**  
Depending on amendments/focused changes, we may we to speak at a hearing regarding allocations on SSSI s and SINC s.

---

### Item Question  Council Responses

**13**

**Council Response**

Support noted.

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</table>

**Document:** Revised LDP, p.107

**Policy:** CF04

**Summary:** Support policy CF4, note that naturalness of area is usually the reason for attracting people to an area.

---

**Item Question**

**Representation Text**

**11**

Gwent Wildlife Trust supports mention of nature conservation interests with respect to water-based recreation and riverside development. It should be noted that it is often the naturalness and biodiversity associated with waterways and rivers that makes the environment attractive for recreation and leisure.

---

**Item Question**

**Speaking at Public Examination**

**Yes**

Depending on amendments/focused changes, we may we to speak at a hearing regarding allocations on SSSI s and SINC s.

---

**Item Question**

**Council Responses**

**13**

Support noted.

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</table>

**Document:** Revised LDP, p.108

**Policy:** CF06

**Summary:** Support the contribution allotments can make towards biodiversity.

---

**Item Question**

**Representation Text**

**11**

Gwent Wildlife Trust supports the protection of allotments, and the recognition of the contribution that allotments can make towards local biodiversity.

---

**Item Question**

**Speaking at Public Examination**

**Yes**

Depending on amendments/focused changes, we may we to speak at a hearing regarding allocations on SSSI s and SINC s.

---

**Item Question**

**Council Responses**

**13**

Support noted.
### Representation Details

**by:** (No grouping)

**Filtered to show:** (all of) Stage=L; Status=M

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</table>

**Document:** Revised LDP, p.109

**Policy:** CF09

**Summary:** Supports the development of a masterplan for the Celtic Manor

#### Item Question  Council Responses

**11 Representation**

Gwent Wildlife Trust supports the production of a masterplan for Celtic Manor, and welcomes the attention drawn to nature conservation interests on and adjacent to the site. We would welcome consultation when the masterplan is produced.

**12 Speaking at Public Examination**

Depending on amendments/focused changes, we may we to speak at a hearing regarding allocations on SSSIs and SINCs.

**13 Council Response**

Support noted. When a Supplementary Planning Guidance document is made available for consultation this is advertised in the local press and the Council's website.
**Representation Details**

* by: (No grouping)
* Filtered to show: (all of) Stage=L; Status=M

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**Document:** Revised LDP, p.113

**Policy:** CF13

**Summary:** Object to school site South of Percoed Lane

**Item Question** | **Representation Text**
---|---
3 | New Policy
4 | A new paragraph or new text
7 | Delete an existing site
11 | Representation

Gwent Wildlife Trust objects to the allocation of land South of Percoed Lane for development, as it is within the St Brides SSSI and would impact negatively on nature conservation interests. We do not believe that alternative sites have been fully investigated.

PPW CH5 (2011) states that 'With regard to SSSIs, which are of national importance, the Wildlife and Countryside Act, as amended by the Countryside and Rights of Way Act 2000, places a duty on all public bodies (including local planning authorities) to take reasonable steps, consistent with the proper exercise of their functions, to further the conservation and enhancement of the features by reason of which a SSSI is of special interest. SSSIs can be damaged by developments within or adjacent to their boundaries, and in some cases, by development some distance away. There is a presumption against development likely to damage a SSSI.'

TAN 5 (2009), states that development plans should 'Make proposals for necessary new development in ways and at locations that are consistent with the nature conservation objectives and policies in the plan itself and with national planning policies'. Development of this site is inconsistent with national policy and SP1, SP9, and GP5 and it should therefore be removed.

Should this allocation remain within the plan, reference should be made to biodiversity issues, and to GP5.

12 | Speaking at Public Examination | Yes

Depending on amendments/focused changes, we may we to speak at a hearing regarding allocations on SSSIs and SINCs.

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12/02/2014 | Page 97 of 1581
The site South of Percoed Reen (CF13 (vii)) is required for additional and enhanced school facilities to meet future educational needs.

Any development of the site south of Percoed Reen for education purposes would require specific ecological surveys and any negative effects would need to be avoided, mitigated and compensated. This is because the site is located in the Gwent Levels, St Brides SSSI.

Developers will be required to consider whether they need to undertake an Environmental Impact Assessment in line with The Town and Country Planning (EIA England and Wales) Regulations 1999.

Under the Habitats Regulations a developer will also be required to carry out a Habitat Regulation Assessment to determine whether the proposal is likely to have significant effects on any of the internationally designated sites found within Newport and within a 15km radius. If this is found to be the case then the developer will be required to submit a statement to inform an appropriate assessment which will be undertaken by the competent authority.

If it is found that the development would lead to adverse effects on biodiversity then the development will not be permitted.

Within the Gwent Levels SSSI, a developer will be required to adhere to the following legislation;

1. The Conservation of Habitats and Species Regulations 2010 (The Habitat Regulations) which implements the EC Birds Directive 2009/147
2. The Wildlife and Countrywide Act 191 (as amended) which implements the EC Birds Directive 2009/147
3. The Natural Environment and Rural Communities Act (2006)
5. The Protection of Badgers Act 1992
6. The Hedgerow Regulations 1997

A developer will also be required to adhere to the following policies, plans and guidance:

2. Convention on Biological Convention
3. Other policies contained within the LDP
4. Newport Local Biodiversity Action Plan (LBAP)
6. Planning Policy Wales PPW 2010
9. NCC Wildlife and Development SPG

The Plan should be read as a whole, therefore reference to biodiversity issues and GP5 is not considered necessary.
### Representation Details

**Policy:** Procedures

**Summary:** Supports readoption of Wildlife and Development and production of Gwent Levels SPG

<table>
<thead>
<tr>
<th>Item</th>
<th>Question</th>
<th>Representation Text</th>
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</thead>
<tbody>
<tr>
<td>11</td>
<td></td>
<td>Gwent Wildlife Trust strongly supports the re-adoption of the Wildlife and Development SPG. We welcome the production of site-specific masterplans and development briefs, and would like to be consulted on major revisions. We also welcome production of SPG for trees, and would welcome involvement in the consultation.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Gwent Wildlife Trust strongly supports the production of a Gwent Levels SPG, and would like the opportunity to be involved in its development. The Gwent Levels has been identified as a Wildlife Trusts Living Landscape and RSPB Futurescape, and both organisations are therefore deeply committed to the protection and enhancement of the area at a landscape scale. We hope that an SPG can be produced jointly with Cardiff City Council and Monmouthshire County Council to provide consistent and coherent guidance for development on and around this important landscape.</td>
</tr>
</tbody>
</table>

**Speaking at Public Examination**

Depending on amendments/focused changes, we may we to speak at a hearing regarding allocations on SSSI s and SINC s.

<table>
<thead>
<tr>
<th>Item</th>
<th>Question</th>
<th>Council Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>13</td>
<td>Council Response</td>
<td>Support noted.</td>
</tr>
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</table>
Redrow Homes (SW) Ltd

Harmers Limited

26/07/2013

Additional material submitted

Document: Revised LDP, p.65, para.2.33 5.1B510

Policy: H01

Map: Constraints West: Constraints Plan - West

Summary: Allocate site at Pentrepoeth as housing allocation.

CE2, CE3, C4. The over reliance on brownfield sites will not deliver the housing requirement and will not maintain a 5 year supply of housing during the LDP period.
There is objection to the LDP strategy in relation to the supply of housing land with its over reliance on previously developed land which includes many constrained sites identified in previously adopted plans which have not been developed. Many of the sites are concentrated in a limited geographical area and in few ownerships with landowners reluctant to bring sites to the market. Policy H1 identifies sites to accommodate 11,622 dwellings over the plan period 2011-2026 with the majority of these consisting of commitments, sites subject to Section 106 Agreements or sites under construction. The LDP only allocates 9 sites of which 5 (H49, H50, H51, H52 and H53) were allocated in the UDP and are undeveloped. There are only 4 new allocations which are estimated to provide only 1260 dwellings over the plan period.

The LDP claims that there is a 12% oversupply (i.e. 1272 dwellings) over the housing requirement of 10,350 dwellings but this is based on unrealistic assumptions about the deliverability of many sites which have a long history of being allocated in previous adopted plans yet remaining undeveloped. It is also considered that the rate of development of Glan Llyn which makes the largest contribution to meeting the LDP housing requirement is far too high.

Housing land supply was discussed at the UDP Inquiry where objections were made that many of the proposed allocations would not be delivered in the plan period up to 2011. These objections were not accepted by the UDP Inspector who considered that the sites would be developed by 2011 and they remained in the adopted UDP. However many of these sites have still not come forward for development but are now identified in the LDP. Delivery is a key indicator of soundness and at present there is insufficient evidence to demonstrate that sites are deliverable. The following LDP sites have been identified in previous development plans and remain undeveloped and some dating as far back as 1999.

<table>
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<th>Within Plan Period</th>
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<td>H1 Adjacent McDreys, PonthirRoad</td>
<td>1999</td>
<td>54</td>
<td>54</td>
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<tr>
<td>H5 Glebelands</td>
<td>1999</td>
<td>153</td>
<td>153</td>
</tr>
<tr>
<td>H15 Victoria Wharf, Old Town Dock</td>
<td>2008</td>
<td>227</td>
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<td>H23 Traston Lane</td>
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<td>21</td>
<td>21</td>
</tr>
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<td>H4 Pirelli</td>
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<td>H49 Mill Street</td>
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<td>H51 Whiteheads Works</td>
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There is therefore considerable doubt over whether the above sites will be delivered in the plan period. The anticipated contribution of these sites is 1362 dwellings which is more than the claimed oversupply of 1272 dwellings.

In addition there is an over reliance on the contribution from H47 Glan Llyn at 2794 dwellings in the plan period. The 2012 JHLAS identifies 2 outlets on the site with anticipated completions of 30-35 per annum but in addition identifies an additional 520 completions in the 5 year supply with 50 of these by April 2013. This would require an additional 2/3 outlets but there is no evidence to date of this happening. The 2012 JHLAS therefore overestimates the contribution of Glan Llyn to the 5 year supply which is continued into the LDP. Unless there is evidence of additional builders on the site the anticipated rate of sales cannot be achieved. If it is assumed that there are 100 completions per annum from 3 outlets this would provide approximately 1400 dwellings some 1394 less than assumed in the LDP.

Rather than a surplus there is a shortfall in provision and unless there is wider range and choice of sites the LDP building requirement will not be met and the plan will be unsound.

The housing landbank at the 1st April 2012 was made up of 87% residential permissions to be delivered on brownfield sites with approximately 90% of the new allocations also being brownfield. The problem with this over reliance on brownfield sites is that the majority of them are located in Eastern Newport which is identified by the Newport City Council Viability Assessment (March 2012) as an area where residual land values are marginal or negative. However even this is an optimistic assessment as the methodology adopted in the Council’s Viability Assessment does not take into account on site abnormal costs. The costs of developing housing sites has escalated and will continue to do so with further changes to national policy which makes brownfield sites in low residual areas unviable. This will make the 30% affordable housing target in policy H4 impossible to achieve which has been the case with recent permissions, for example, Mon Bank sidings permission granted in January 2011 has 6% affordable housing.

The consequence of this over-reliance on brownfield sites is that the housing requirement of 10,350 dwellings over the plan period will not be delivered. The LDP annual requirement is 690 dwellings which is more than a 50% uplift of the annual build rate of 456 over the period 1996-2012. The existing housing supply is incapable of delivering this requirement and as the LDP is only allocating an additional 4 sites the housing requirement will not be achieved unless a wider range and choice of sites are allocated throughout the city including those areas close to the major employment allocations to the west of the city at Celtic Springs and Duffryn. It also means that it will not be possible for the Council to maintain a 5 year supply of housing land throughout the plan period.

The evidence base does not demonstrate that the housing sites identified in the LDP are deliverable and as such the LDP is unsound as the LDP housing requirement will not be delivered and it will not
be possible to maintain a 5 year housing land supply. Consideration needs to be given to deleting those sites which cannot be delivered in the plan period and replaced by alternative deliverable allocations in sustainable locations.

In order to ensure that there is an adequate range and choice of housing sites and to ensure that a 5 year land supply is maintained throughout the plan period, there needs to be a wider range and choice of sites throughout the city to avoid an over concentration of sites in a limited geographical area where residual land values are low. The alternative site at Pentrepoeth shown on the attached plan should be included as a housing allocation. This would provide additional flexibility in the land supply and help to ensure that the LDP housing requirement including affordable housing targets will be delivered. Building rates over the last 10 years have averaged 487 per annum and unless there is a wider range and choice of sites the LDP requirement of 690 per annum (+48%) will not be achieved.

The alternative site, which is located between Pentrepoeth Road and Penylan Road, Bassaleg, would provide a sustainable settlement extension on a site which is deliverable. The site is in the control of Redrow Homes, there are no constraints and it would make an important contribution to meeting the housing requirement of the LDP. The site area is approximately 10 hectares and it could accommodate in the order of 225 new dwellings (30% affordable) on a net development area of approximately 7.5 ha.

The site was submitted as an alternative site when the deposit plan was published for consultation in April 2012. The consultation response from highways on the alternative site raised concerns over the capacity of the highway to support the level of traffic, the suitability of the junction at the A468 and stated that the site is considered poor in terms of sustainability. However these comments are at odds with the findings of the UDP Inspector’s Report (September 2005). Part of the submissions to the UDP Inquiry a Transportation Assessment was submitted on behalf of Redrow Homes by Pinnacle Transportation Limited which concluded that the development of the site would not result in an unacceptable impact on the highway network and that the site is well located in relation to existing sustainable transport facilities. This assessment was accepted by the UDP Inspector who stated (para 3.78) “On the evidence available to me it appears that there are no insurmountable barriers to the provision of a safe access and adequate infrastructure to serve the site or of making any necessary improvements to the local road network.” The inspector also stated “Given its proximity to local services and bus routes the site is in a sustainable location.”

The consultation response from the City Council’s Green Services stated that the development of the site would have an adverse impact on the landscape both on amenity and visually. Again these comments are at odds with the findings of the UDP Inspector A Landscape Assessment was submitted to the UDP Inquiry by the Cooper Partnership which was accepted by the UDP Inspector who stated (3.79) “The inward facing nature of the local landform means that development on the site would not be widely visible from the open countryside to the south-west.” The UDP Inspector also recommended the deletion of the green wedge designation covering the site.

The merits of the site have been recognised previously. In the mid 1990s the site formed part of a larger area which was subject to a planning inquiry, the Inspector recommending approval but being dismissed by the Secretary of State in 1997 primarily on the grounds of prematurity. The site was also identified as being suitable for residential development in structure plan documents where it was recognised that development of the site would have minimal visual impact on adjoining development.

As noted above the site has an inward facing character. There is a stream which runs through the centre of the site, in a roughly south westerly to north easterly direction, and the site slopes inwards and downwards towards this feature. The stream corridor, together with copses and hedgerows of interest would be retained and enhanced within the development scheme. The stream corridor would become a key feature of the site. Part of the land has previously been developed as a nursery, but this area is now derelict, whilst part of the land is used for the grazing of ponies. The remainder of the site comprises agricultural land. Several footpaths cross and link into the site, some informal paths have been created by school children and these can be formalised to create Safe Routes to School.

The site has been designated as special landscape area but the site is not of landscape merit and should be excluded from this designation. In addition, the local land form means that there is restricted visibility into this site from its environs.

One of the key indicators in promoting sustainable travel patterns is to ensure that a wide range of facilities are available for residents within a comfortable walking distance. The site is located within 400 metres of the nearest bus stops which are on Caerphilly Road and there are regular services running to Newport and Caerphilly Bassaleg Comprehensive School is also within 400 metres of the site and Bassaleg Primary School 800 metres. The site is also within a short walking distance of a range of facilities including sports and leisure facilities, local stores, public houses and places of worship. Rogerstone Railway Station is within 5 kilometres of the site. The development of the site offers the opportunity for improved footpath links to serve the community. It is also close to the major new employment allocations in the west of the city at Celtic Springs and Duffryn.

The services, facilities and employment opportunities of Newport City centre are readily accessible to the site via regular public transport. The site is in a highly sustainable location, it would have an acceptable visual impact and it is fully deliverable. There are therefore no constraints to the development of the site and it would therefore make a valuable contribution to meeting the LDP’s housing requirement and providing a diversity of sites.
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**Item Question**  Council Responses
Justification of Requirement
Planning Policy Wales sets out the overarching requirement for development to be placed on brownfield sites in preference to greenfield sites. The plan allocates 82% housing units on brownfield sites with the remaining 18% of units on greenfield sites (these calculations exclude the completions, windfall and small sites supply figures). The LDP is therefore compliant with Planning Policy Wales in terms that it has followed the search sequence criteria starting with the re-use of previously developed land and buildings within settlements which are located in areas accessible to jobs and services, where there is existing infrastructure and the scope to build sustainable communities.

Reliance on previous Development Plan sites
The Local Development Plan does have a number of housing sites which were identified within the Unitary Development Plan. In total there are 15 of the 55 housing sites which continue into the new plan. The majority of these sites have progressed significantly from the UDP, as noted below:

1. Land adj. McReadys. As of 1st April 2013 the developer is on site preparing the site for development.
2. Eastern Expansion Area. Planning permission has been granted with a signed Section 106 agreement. Gallagher Estates have confirmed through the JHLAS process that they will be delivering units on site in 2015.
3. Monmouthshire Bank Sidings. Redrow are on site and progressing.
4. Traston Lane. The site has planning permission and the agent has confirmed that they anticipate development on the site in 2015.
5. Pirelli. This site has been sold to the Seren Group (RSL) who launched the development in September 2013.
6. Ty Du Works. An application is being considered by the Council for a new scheme on the site.
7. Farmwood Close. This is an historic site with a LDC for the implementation of 10 units which have not been completed. The land is currently being marketed.
8. City Vision. The developer is on site and progressing.
9. Herbert Road. This site is adjacent to the Glebeland site noted above. The site is compliant with the overall strategy of the LDP being a brownfield urban site in need of regeneration. There is no application on the site but the area land owner notes their intention to sell the site for development.
10. Whitehead Works. This site is part of a Welsh Government regeneration scheme, which anticipates delivery to begin in 2016.

The information above clearly shows that although there are a number of sites which have been carried forward from the UDP they have in the main progressed significantly or that they will be delivered within the plan period. It is also important to note that it was made clear through the UDP process that the growth proposed in the east of the city (i.e. Glan Llyn and Llanwern Village) was not anticipated to be delivered wholly within the UDP plan period.

Deliverability and Supply
Nonetheless the development rate anticipated over the plan period for the large housing development at Glan Llyn, is based on an annual review through the Joint Housing Land Availability Study (JHLAS) as required by National Planning Policy. The rates are considered appropriate and have been jointly agreed with the JHLAS study group which includes the development industry.

The Plan sets out the anticipated rate of delivery in Chapter 13 which illustrates that the total number of units is set to be delivered across the plan period. This in turn is established yearly through the Joint Housing Land Availability Study and monitored annually within the AMR. The effects of the economic recessions are still being felt within the housing market so it is therefore of no surprise that the plan anticipates a lower growth in the first period of the plan compared to the final ten years. The Plan does however provide enough land to ensure that a 5 year supply is met and, that although the annual build rate is higher than currently achieved, even when taking into account the residual method of calculation the Council has provided an adequate supply of land which has been agreed with the industry through the JHLAS process.

It is considered that the plan provides a more than adequate supply of housing which is both deliverable and viable. Many of the sites have progressed since the Revised Deposit Plan was written and there is a steady supply of housing being achieved across Newport.
Range and Choice
The supply of housing is not only steady in Newport but the Plan provides for a clear range and choice of housing. The housing sites within the Plan are located across the City, with a clear focus on regeneration in the east as per the established strategy. The Plan provides a supply of affordable units for a mixture of needs as well as providing a mix of family homes and inner city living to cater for the broad housing market. The opportunity to provide homes in more rural locations has been investigated and there was no clear evidence to justify expansion to existing settlements. The Plan therefore has provided the opportunity for exception sites where such justification can be produced.

Viability and Deliverability
The planning system does recognise that sites have unique factors which will result in varied levels of costs. In addition to the abnormal costs associated with each site there are additional factors such as Building Regulations and Code for Sustainable Homes that increase the requirement to builders and therefore affect costs. Such factors are not in the control of the Local Planning Authority and are required by the conditions of the Welsh Government, who take into account the additional costs such new conditions require. Such costs are knowns and as such it is the planning system's role to ensure developments provide adequate levels of education, open space and affordable housing etc. Such costs should be taken into account at the land acquisition stage. It is accepted that some sites will have additional costs that are not picked up through the BCIS method which may have an affect on lower value areas but which should not skew a reasonable approach based on a methodology which the house building industry recognise. The planning system has remained flexible in its approach allowing viability assessments to allow for such abnormal costs to be factored in so that the housing market can continue but it should not do so to the detriment of creating sustainable communities.

The plan seeks to promote the reuse of brownfield sites in preference to extensive use of greenfield sites as these generally perform better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities.

Chapter 13 of the Revised Deposit Plan and the Delivery and Implementation Background Paper 2013, set out the background to each allocation within the plan. It identifies the anticipated rate of delivery and identifies constraints and planning histories. It must be noted that the majority of residential allocations are in the position of holding planning permissions and as such the level of investigation as to the delivery of the site has been undertaken through the planning application process. There are 9 remaining sites within the plan which are Housing Proposals, these themselves have seen some progression:

i) Mill Street – The site is being marketed by NCC.
ii) East Usk Yard: The site is not anticipated to come forward until the end of the Plan period due as Network Rail, the proposers of the site, require the site for rail related uses until the later phase of the Plan.
iii) South Wales Argus – There is a current application being considered by the Council.
iv) Alcan – This site has planning permission for a residential led development.
v) Whiteheads - This site is part of a Welsh Government regeneration scheme, which anticipates delivery to begin in 2016.
vi) Woodlands Site – This site has not been sold.

VII) Old Town Dock Remainder – the site has had some landscaping work undertaken and there is a development company signed up to undertake the complete regeneration of the site.

The effects of the economic recessions are still being felt within the housing market so it is therefore of no surprise that the plan anticipates a lower growth in the first period of the plan compared to the final ten years. The Plan does however provide enough land to ensure that a 5 year supply is met and that although the annual build rate is higher than currently achieved, even when taking into account the residual method of calculation, the Council has provided an adequate supply of land which has been agreed with the industry through the JHLAS process.

It is recognised that the required level of affordable housing for Newport cannot be met by the Plan alone. The level of supply which can be achieved through the implementation of the affordable housing policy in addition to those units already secured through the planning process has been clearly set out. It is not the sole responsibility of the planning system to meet the affordable housing requirement however the Plan does set a policy framework in order to achieve the highest level of affordable housing provision possible. Such provision has taken into account the viability of the policy threshold for affordable housing yet remains flexible to ensure that viability can be considered so that the housing market is not stifled by a non-negotiable approach to affordable housing provision.

The forecast housing need has been assessed in the context of population and employment projections and current market realities. The plan allocates sufficient land to meet this requirement.
Additional housing allocations in a rural location cannot therefore be justified. Furthermore, the release of the representation site for housing would be contrary to the Council’s strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

Flexibility
As the representation notes there is no set flexibility figure required for housing supply within development plans. However, during the examination of the Brecon Beacons National Park LDP WG noted a notional figure of 10% but that needed to reflect local circumstances. Other authorities within South East Wales have a range of 12-20% flexibility. It is good practice to allow for unknowns and the need for flexibility within a development plan is inherent from National Planning Policy. In Newport’s case the majority of the housing supply has planning permission or is being progressed. Those remaining 9 sites without planning permission are in line with the overall strategy or regeneration needs of the plan. Together they provide a 12% oversupply which is considered appropriate to enable to plan to cope with uncertainties that may arise over the plan period.

Strategy compliance and delivery.
It is considered that the plan provides a more than adequate supply of housing, both market and affordable, which is both deliverable and viable. Many of the sites have progressed since the Revised Deposit Plan was written and there is a steady supply of housing being achieved across Newport. The Plan identifies its housing and employment land supply for the plan period based on an assessment of need. The clear strategy for the Plan is for growth and it will be through the successful implementation of the policies of the Plan that this will be achieved. There is a clear link between housing supply and economic growth which is why the supply will be monitored annually.

The site at Pentrepoeth is located immediately adjacent to the settlement boundary and is greenfield within the countryside and Special Landscape Area designations. Development does not reflect the underlying brownfield strategy for the plan and it is therefore recommended that this site is not included in the Local Development Plan for residential purposes and that it continue to be allocated within the Special Landscape Area and Countryside designations.
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<td>The alternative site, as shown on the attached plan should be excluded from the Special Landscape Area (Tredegar Park).</td>
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<td>12</td>
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No change. The site is within proposed Countryside and Special Landscape Area allocations. The plan seeks to promote the reuse of brownfield sites in preference to extensive use of greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities.

The forecast housing need has been assessed in the context of population and employment projections and current market realities. The plan allocates sufficient land to meet this requirement. Additional housing allocations in a rural location cannot therefore be justified. Furthermore, the release of the representation site for housing would be contrary to the Council’s strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

A background paper ‘Delivery and Implementation’ has been produced to expand on the information supplied in Chapter 13 of the Deposit LDP. This sets out the proposed phasing, constraints and infrastructure requirements for each allocation. The Delivery of each site is considered here, setting out the justification for its continuation in the plan based on evidence from developers and landowners. Some of the large brownfield sites allocated within the previous Unitary Development Plan have started construction e.g. Glan Llyn with 4000 homes and employment uses on the site. The impact on development by the economic recession is to be considered and the plan takes a long term view across the entire plan period.

The LDP sets out a strategy for growth which allocates an adequate supply of land for residential and employment uses. The supply of this land is not concentrated in one area but across the City. It is recognised that growth in the east is significant but the west has not been overlooked with large brownfield sites allocated at Novelis, former Whitehead Works and Monmouthshire Bank Sidings. The review of village boundaries has clearly considered the need for expansion in these areas and following their assessment boundaries have been tightened and allocations resisted due to the unsuitability of sites proposed in these unsustainable locations.

In relation to the comments regarding the quality of the landscape; The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales’ guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area scored highly enough, as part of the Landmap assessment process, and because of this the area has been included as Special Landscape Area in the Revised Deposit Local Development Plan.

Notwithstanding the representation submitted in support of this site, the Council maintains the position that the LDP is sound and relies on the evidence which supports it. In this respect, the Council does not support this site. The Special Landscape Area allocation should therefore remain.
### Representation Details

**by:** (No grouping)  
Filtered to show: (all of) Stage=L; Status=M

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Document: Revised LDP, p.39, para.3.10 Criteria ii and iv  
Policy: GP01  
Summary: Amend the wording of Policy GP01
Representations Details

by: (No grouping)
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HBF Supplementary Paper for Policy GP1 – Para 3.10

We understand the Council would wish to see materials recycled and not removed from site, however we believe the paragraph as it stands is too onerous on developers, particularly where the use of recycled materials or the removal of materials from site would be possible, but not practical. In this respect, there might be many circumstances where the use of recycled materials or the retention of materials on site might be possible, but for a variety of different reasons, it might not be practical and therefore, we believe the paragraph should be reworded to reflect this.

Suggested Change

The paragraph should be reworded as follows:-

3.10 In order to ensure that finite resources are being used in a sustainable manner, developments should where practical and possible use secondary and recycled aggregates as part of the construction process. Wherever practical and possible this should be done without taking materials off site. This would complement the Plan’s Strategic Policies on Waste Management and Minerals (SP21 and SP22 respectively).

Newport Deposit LDP

HBF Supplementary Paper for Policy GP1 - Criteria ii and iv

In terms of Criterion ii, we do not believe it is appropriate for this policy to require all developments to incorporate low and zero carbon energy sources, as this might not always represent the best or most efficient way to achieve any set carbon reduction targets in new dwellings.

The Welsh Government will set a requirement for the energy efficiency of new dwellings through building regulations, which is outside the remit of the planning system. In this respect, it will be for housing designers to find the best and most efficient way to achieve these required standards in newly built homes and therefore, to have a planning policy that attempts to pre determine such design requirements would only serve to hinder the design process rather than assist it.

In light of the above, we believe Criterion ii of Policy GP1 is unnecessary and inflexible and therefore contravenes soundness tests C2 and CE4.

In terms of Criterion iv, as stated above, the Welsh Government will set a requirement for the energy efficiency or new dwellings through building regulations, which is outside the remit of the planning system. Therefore, Criterion iv of Policy GP1 is also unnecessary and therefore contravenes soundness tests C2.

Suggested Change

Criteria ii and iv of Policy GP1 General Development Principles – Climate Change, should be removed.

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<td>Item Question</td>
<td>Council Response</td>
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13  Council Response

The suggested change to paragraph 3.10 is considered unnecessary because the use of the word ‘should’ in the paragraph already ensures a degree of flexibility for developers.

The suggested amendments to criteria ii) and iv) of Policy GP1 are considered unnecessary because the main text of the policy contains ‘should’ instead of ‘must’, thus ensuring a degree of flexibility in the assessment of development proposals.
Newport City Council Local Development Plan

Representation Details

Document: Revised LDP, p.42, para.Criterion vi
Policy: GP04
Summary: Amend wording of Policy GP04

Criterion vi of policy GP4 states the following:

(vi) DESIGN AND BUILD NEW ROADS WITHIN PRIVATE DEVELOPMENT IN ACCORDANCE WITH THE HIGHWAY AUTHORITY’S ESTATE DEVELOPMENT DESIGN GUIDE AND RELEVANT NATIONAL GUIDANCE;

Firstly, we believe the reference to adhering to national guidance is unnecessary and should be removed.

Secondly, is not appropriate for policies within the LDP to refer the use of other plans or supplementary planning guidance. Essentially the Highway Authority’s Estate Development Design Guide referred to above is a form of supplementary planning guidance. In order to support this, paragraph 5.2 of LDP Wales clearly sets out the type of document that can be described as SPG, and specifically states that it can take the form of site specific guidance such as master plans, design guides or area development briefs.

In terms of the proper use of SPG and its relationship to planning policy, paragraph 5.4 of LDP Wales (2005) specifically states that SPG can play a useful role in supplementing plan policies and proposals, however, SPG should not be used to avoid subjecting plan policies and proposals to public scrutiny in accordance with statutory procedures. The paragraph also goes on to state that Plan policies should not attempt to delegate the criteria for decisions on planning applications to SPG.

In the context of the above, it is clear that Criterion vi of Policy GP4 sets out a requirement for the provisions of the SPG to be adhered to. As such, the policy is contrary to the requirements of National Guidance with respect to the appropriate creation of local planning policy and therefore, Policy GP4 is contrary to Soundness Test C2.

Suggested Change

Criterion vi of Policy GP4 should be removed as it is unnecessary and contrary to National Guidance.

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12 12 Speaking at Public Examination

No

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**Item Question Council Responses**

13 13 Council Response

It is considered appropriate that the policy act as a hook to national policy, and that the reference is appropriate, in accordance with test of soundness C1.

With regards to the comments made in relation to paragraph 5.2 of LDP Wales (December 2005), the Estate Development Design Guide is an adopted council document but is not SPG. It is referenced in order to direct developers to guidance used by the Council in order to provide clarity on the standards expected in relation to those issues covered by the guidance.
### Representation Details

**Document:** Revised LDP, p.65  
**Policy:** H01  
**Summary:** Concern regarding the supply of land allocated under Policy H01, and the viability of sites as a result of remediation costs.

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CE2, CE4
We are extremely concerned with the housing supply set out within Policy H1 of the development plan.

Viability and Deliverability
Firstly, we are concerned with a strategy that attempts to deliver the majority of its housing on constrained land, without giving any consideration to the issue of development viability.

Policy H1 of the Deposit LDP contains a list of allocated housing sites, many of which have significant constraints that will need to be addressed before development can proceed. This, coupled with the impending changes to national policy and the raft of planning obligations that will be sought on each site through the LDP, could have a major impact on the viability of many of the allocated sites, which in turn could impact on their ability to deliver a range and choice of housing, including affordable housing. In this respect, if you study the latest JHLAS report (2012), there are currently 8083 units in category 3(i) and 613 units in category 3(ii). As such, out of the total supply of 11761 units, there are 8696 units or roughly 75% of sites that have significant constraints to development. In light of this, given the LDP strategy relies heavily on these existing commitments and allocations, we are extremely concerned that the current land supply could hinder the delivery of the pro-growth strategy and compromise the delivery of homes in Newport over the LDP period.

We would also advise caution given the current economic climate and the effects of the recession when assessing site viability for residential development. The economic downturn has had a dramatic effect on land values in all areas of Wales and the impact of proposed changes to national guidance and regulation will add additional cost and clearly not help matters in this regard. Therefore, given that land values will be the principle capital mechanism used to deliver housing, and the raft of policy requirements from the authority and national government, the LDP should be mindful of the potential issues with viability that could arise from the implementation of such a challenging strategy.

Turning attention to viability specifically, it is concerning to note that the Affordable Housing Viability Assessment takes no account of requirements of developing constrained sites. The study is based solely on the development of ‘unconstrained land’, which therefore casts some considerable doubt over its assumptions on the viability of the land for housing development in the LDP. We expand on our concerns with respect to the Affordable Housing Viability Assessment in a separate representation, however, it is clear that a viability assessment which bears no relationship to the land proposed for development in the LDP, will do very little to inform the important issues of viability and deliverability.

Further to the above, we also believe the ability for the strategy to deliver its pro-growth aspirations and to provide a range and choice of housing could be compromised by concentrating development solely on land that is constrained and would require significant works and cost to enable development. In this respect, if Newport is seeking to achieve growth and attract inward investment, it would seem largely irregular for the LDP strategy to rely so heavily on housing sites that are constrained or indeed, to rely on sites that have a long history of non-development. The NLP Housing Assessment report clearly outlines that the principle of LDP strategy is ambitions and links with the Welsh Governments priorities to increase housing growth and create jobs and investment. However, it also points out the potential pitfalls and dangers of failing to achieve the pro-growth strategy. In this respect, the authority should be commended for proposing such a positive strategy for growth, which aims to rejuvenate the area and represents a marked change from that which has been proposed previously. However, we have grave concerns with respect to the delivery of the strategy, given that its prime delivery mechanism (i.e. the land for housing development), has changed very little over the last 20 years.

In light of the above, we believe a thorough appraisal of the deliverability of the sites in Policy H1 needs to be undertaken in order to ensure they are capable of being delivered in the face of such a challenging local and national policy environment. We believe this exercise should be done before the Examination process, in order to ensure the LDP can be submitted to the Examination with the necessary evidence to demonstrate that the housing strategy can be delivered.

Focus on previously allocated housing sites and existing commitments
Without wishing to comment on any one particular site, it is clear that the LDP attempts to roll forward a significant number of allocations from previous development plans and has a heavy reliance on existing commitments. A large number of the allocations in Policy H1 have been available for development for quite some time, but have yet to be developed or gain interest from a developer to suggest the site might progress in the future.

To be specific, if you study the new sites that are proposed within the LDP supply, it would seem that only four of the sites are actually new allocations i.e. Rear of South Wales Argus, East Usk Road,
Former Alcan Site and Woodland Site Ringland. The remaining sites all feature in the current land supply and therefore cannot be considered to be new allocations. In terms of figures, actual new allocations proposed over the LDP period amount to 1260 units. Set against a total supply of 11622 units, new allocations represent just 10% of the LDP land supply.

In this respect, we believe this provides further credence to our suggestion that the housing sites within Policy H1 require additional evidence to demonstrate their potential deliverability. We believe it is reasonable to assume a cut-off point to a strategy that attempts to roll forward previous allocations or commitments, without any evidence to prove they are indeed deliverable – particularly given the more onerous local and national policy environment that now exists and will exist in the future. If housing sites have consistently failed to be developed in the past, particularly in more favourable policy and market conditions, one must start to consider the likelihood, or potential, for such sites to be developed in the future. Or at the very least, there should be robust evidence to justify why the council believes such sites might now be developed, despite their long standing history of non-development.

JHLAS Issues – maintaining a 5 year land supply

In light of our comments above, we believe the LDP could suffer major issues with respect to its ability to generate a consistent 5 year supply of land for housing development. The requirement for an authority to maintain a minimum 5 year supply is enshrined within national guidance and has been reinforced by the recent Ministerial Statement from the Housing Minister, which sets out his clear priority to increase the supply of land for housing in Wales. In this respect, we are extremely concerned that when the LDP is adopted, given the issues we have raised above with viability, deliverability and site constraints, there is a very real possibility that the LDP would be adopted with a land supply well below the 5 year threshold. Moreover, we also believe it would be extremely difficult for the local authority to increase and maintain supply in the short term, unless additional allocations are made.

We believe the above issue is significant and warrants further investigation and discussion. As such, we believe it is imperative that the local authority undertakes a Joint Housing Land Availability Study that takes account of the LDP strategy and sites, in order to ensure there will be sufficient land for development maintained within the authority at all times post adoption. We believe this exercise should be undertaken in consultation with the development industry and should be done before the LDP Examination. Given that the local authority is yet to undertake the 2013 JHLAS study, there might be scope to undertake this exercise in tandem with the 2013 JHLAS consultation.

Soundness Tests

In light of our evidence above, we believe the housing land supply is not based on robust and credible evidence to demonstrate delivery. We believe the supply is also not sufficiently flexible in order to ensure the housing requirement figure can be delivered, particularly in view of the more challenging policy environment set by the LDP and the Welsh Government.

Policy H1 therefore contravenes Soundness Tests CE2 and CE4. Implementing the changes below might help to satisfy these Soundness Tests.

Suggested Changes

1. A thorough appraisal of the deliverability of the sites in Policy H1 should be undertaken, in order to demonstrate they are capable of being delivered alongside the policy aims and objectives of the LDP and the Welsh Government.

2. The appraisal should also take account of any sites that have a long standing history of non-delivery and provide evidence to demonstrate the likely potential for future delivery.

3. The appraisal should also consider the likelihood of the authority achieving and maintaining a 5 year supply of land for housing development when the LDP is adopted. A ‘mock LDP JHLAS’ should be undertaken to establish whether or not a 5 year land supply can be maintained.

4. The appraisal should also consider whether or not the reliance on existing commitments and constrained sites would impact negatively on the delivery of a range and choice of housing and the LDP’s ability to achieve the aims and objectives of its pro-growth strategy.

Finally, given our concerns above, and the likelihood of additional evidence to justify our concerns being made available in the run up to the LDP examination (particularly through subsequent JHLAS studies) we respectfully reserve the right to comment further on these issues through the Examination process.
Evidence from HBF members on the average cost of remediating sites and addressing abnormal constraints

Developer no.1
• Site 1 - A former steelworks - £263k per acre.
• Site 2 – Industrial site without contamination - £130 per acre.
• Site 3 – Site in Aberdare including raising site - £205k per acre.
• Site 4 – Site in the Vale of Glamorgan - approx £400k per acre.
• Average £250k per acre

Developer no.2
Sites are relatively straightforward and some have benefited from prior remediation
• Site 1 - Park Road - £115k per acre
• Site 2 - Bagworth - £134k per acre
• Site 3 – Cleobury Mortimer - £147k per acre
• Site 4 - Yately - £169k per acre
• Site 5 - Humberstone - £227k per acre
• Average - £159k per acre

Developer no.3
• £250k per acre is reasonable

Developer no.4
• Site 1 – Former factory, contaminated site - £439,335 per acre
• Site 2 – Sloping site, largely made ground - £192,908 per acre
• Site 3 – Sloping greenfield site - £164,500 per acre
• Average - £265,581 per acre

Appendix 2
Evidence to support the estimated cost of remediating sites and addressing abnormal constraints
Report from Arup
Your ref
Our ref
File ref

By Post & Email
4 Pierhead Street
Capital Waterside
Cardiff CF10 4QP
United Kingdom
 t +44 29 2047 3727
 f +44 29 2047 2277
bob.irvine@arup.com
www.arup.com
Planning & Policy Advisor - Wales
House Builders Federation
PO Box 2512
Brownfield Sites - Remediation/Reclamation Cost Estimates

Along with Integrale Geotechnique we have been approached by a number of major house builders in South Wales to confirm to you typical costs for the remediation/reclamation works on brownfield sites. Arup has been involved in the remediation and redevelopment of many of the brownfield sites in South Wales. We have assisted a number of clients e.g. BP, ABP, Welsh Development Agency, in the investigation and development of remediation strategies for approval by the relevant Authorities; subsequently the detailed design, construction supervision and validation of the remediation works. Many of these sites have been or will be developed for housing such as Rhoose Point, Waterfront, Barry, Coed D'Arcy, Maesteg Washery and Llanilid.

We have successfully developed remediation proposals to address various types and quantities of contamination using appropriate methods agreed with the regulatory authorities. Due to this variation in the nature of the contamination methods used the consequent cost varied from site to site. This cost was also affected by the size of the site (smaller the site, the higher the cost per acre), the historic use of the site and the risk posed to the environment. Reclamation/remediation costs for sites where residential development was proposed were generally higher than for other uses, particularly where domestic gardens were proposed.

As such, from our experience, the remediation/reclamation costs, including demolition of disused buildings varied between typically £100K to £250K per acre. In exceptional circumstances with highly contaminated sites the remediation costs could exceed £250K/acre.

The above costs do not include for special measures to be incorporated by the developer to address the specific ground conditions. Based on an average of 15 units per acre, a typical cost per acre for these abnormalities would be circa £75K. This covers raft foundations at £2,500 per unit extra over normal strips, £750 per unit for gas barrier in the slab and importation of 600mm thick clean subsoil/topsoil in the gardens.

Therefore, the total cost of remediation/reclamation works and developers abnormalities for development of brownfield sites for housing would be circa £175K to £325K per acre.

If you require further clarification or information please contact us. Hopefully the above provides a reasonable guide.

Yours faithfully
Bob Irvine
Director

Report from Integrale Geotechnique

We have been approached by a number of major house builders in South Wales to write and confirm to you typical costs for the remediation/reclamation works of brownfield sites. For many years our company has been acting as the Geotechnical and Geoenvironmental Consultant to a great number of house builders for the regeneration and redevelopment of brownfield sites.

We have a good track record for dealing with many types of brownfield sites including iron and steelworks, chemical works, scrap yards, shipyards, railway sidings, disused factories, colliery sites, mine spoil heaps, gasworks, landfills, paint and tar works etc.

The typical remediation/reclamation cost per acre depends on the following:
1. The size of site (the smaller the site, the higher the cost per acre).
2. The type/category of the sites historic use.
3. The level of risk that the site poses to the environment (e.g. if the site is adjacent to a river or near to controlled waters, then there is a potentially high risk of environmental impact). However from our experience, the reclamation/remediation costs, including the demolition of disused buildings, could vary between typically £100k and £250k per acre. In the case of highly and extensively contaminated sites such as oil refineries and tar plants, the remediation costs could be much greater than £250k per acre.

In addition to the above remediation/reclamation costs, many brownfield sites have additional abnormal development costs associated with the need for other requirements such as piled/reinforced concrete raft foundations, ground gas protection barriers, importation of clean subsoil/topsoil etc. Based on an average of 15 units per acre, a typical cost per acre for these abnormals would be circa £75k. This covers raft foundations at £2500 per unit extra over normal strips, £750 per unit for gas barrier in the slab and importation/placement of 600mm thick clean subsoil/topsoil in the gardens. Therefore, the total cost of remediation/reclamation works and developers' abnormals for redevelopment of brownfield sites for housing would be between circa £175 and £325k per acre.

We trust that the above is a useful guide. If you should have any queries or require any further information, please do not hesitate to contact us.
The response made concerning Viability Assessment of Affordable Housing is set out in representation 136.L4

Over reliance on brownfield

Planning Policy Wales sets out the overarching requirement for development to be placed on brownfield sites in preference to greenfield sites. The plan allocates 82% housing units on brownfield sites with the remaining 18% of units on greenfield sites (these calculations excludes the completions, windfall and small sites supply figures). The LDP is therefore compliant with Planning Policy Wales in terms that it has followed the search sequence criteria starting with the re-use of previously developed land and buildings within settlements which are located in areas accessible to jobs and services, where there is existing infrastructure and the scope to build sustainable communities.

Extensions to more isolated settlements such as the village areas within Newport have also been investigated. The preferred strategy set out that well evidenced sustainable village expansions would be considered, however none were considered appropriate. The plan does include a housing exception policy for affordable housing development within the countryside on the edge of existing settlements whereby providing the flexibility for the provision of a local housing requirement. Those applications which were considered as part of this review of village boundaries and potential extension plots have been assessed individually and the result of this assessment can be viewed in the Alternative Sites Assessment Report 2013 and the Settlement boundary methodology background paper 2013.

It is therefore considered that the LDP provides a balanced housing supply, concentrating on the continued sustainable use of previously developed land.

Reliance on previous Development Plan sites

The Local Development Plan does have a number of housing sites which were identified within the Unitary Development Plan. In total there are 15 of the 55 housing sites which continue into the new plan. The majority of these sites have progressed significantly from the UDP, as noted below:

1. Land adj. McReadys. As of 1st April 2013 the developer is on site preparing the site for development.
2. Eastern Expansion Area. Planning permission has been granted with a signed Section 106 agreement. Gallagher Estates have confirmed through the JHLAS process that they will be delivering units on site in 2015.
3. Glebelands. This site has an extant planning permission associated with the school site adj to the residential area. The land has recently been sold to a developer.
4. Monmouthshire Bank Sidings. Redrow are on site and progressing.
5. Traston Lane. The site has planning permission and the agent has confirmed that they anticipate development on the site in 2015.
6. Pirelli. This site has been sold to the Seren Group (RSL) who launched the development in September 2013.
7. Ty Du Works. An application is being considered by the Council for a new scheme on the site.
8. Farmwood Close. This is an historic site with a LDC for the implementation of 10 units which have not been completed. The land is currently being marketed.
9. City Vision. The developer is on site and progressing.
10. Trinity View. The developer is on site and progressing.
11. Glan Llyn. The developer is on site and progressing. A third developer (St Modwen) are anticipating to begin work on Phase 2 in 2015.
12. Mill Street. The site is owned by NCC who will market the site.
13. Herbert Road. This site is adjacent to the Glebeland site noted above. The site is compliant with the overall strategy of the LDP being a brownfield urban site in need of regeneration. There is no application on the site but the area land owner notes their intention to sell the site for development.
14. Whitehead Works. This site is part of a Welsh Government regeneration scheme, which anticipates delivery to begin in 2016.
15. Bideford Road. This site is compliant with the overall strategy of the LDP being a brownfield urban site with potential for regeneration. There is no application on the site but the area is the remaining part of a housing estate development.

The information above clearly shows that although there are a number of sites which have continued from one development plan to the other they have in the main progressed significantly or that they will be delivered within the plan period. It is also important to note that it was made clear through the UDP process that the growth proposed in the east of the city (i.e. Glan Llyn and Llanwern Village) was not anticipated to be delivered wholly within the UDP plan period.

Over the plan period 57% of residential allocation will be located in the east as defined in the strategy paper, 27% will be located in the central area, and 16% in the west. The largest proportion of
residential development is proposed in the eastern area, with Glan Llyn and Llanwern Village accounting for a large proportion of this. The Unitary Development Plan sought to concentrate development on brownfield land in the eastern area of the city. The continued concentration of the majority of residential development in this area is a legacy of the aspiration of the Unitary Development Plan and a reflection of the brownfield led strategy of the Local Development Plan.

The amount of development in the central area is a reflection of the on-going regeneration of the central area of Newport. Newport Unlimited Urban Regeneration Company prepared a Central Area Master Plan (originally produced in 2003/04 and refreshed in 2010/11) which sets out the proposals for the regeneration of the central Newport area. The concentration of residential development is a legacy of this plan, and a reflection of the brownfield led strategy of the Local Development Plan.

The smaller percentage of residential development in the western area is a reflection of the character of the area which includes fewer brownfield sites. However there are a number of sites proposed in the area the biggest of which is the former Alcan aluminium factory site.

There is a spread of sites throughout Newport which provide a range of choice of house types and locations. In proposing that new homes should be predominantly developed in the core urban area with a good level of service provision, the Council's approach follows guidance in PPW. In the case of large brownfield sites, such as Glan Llyn, the amount of housing proposed will serve to drive demand for local services, shops and facilities.

The two main residential sites in the East (Glan Llyn and Llanwern Village) are considered annually as part of the Joint Housing Land Availability Study

Range and Choice
The supply of housing is not only steady in Newport but the Plan provides for a clear range and choice of housing. The housing sites within the Plan are located across the City, with a clear focus on regeneration in the east as per the established strategy. The Plan provides a supply of affordable units for a mixture of needs as well as providing a mix of family homes and inner city living to cater for the broad housing market. The opportunity to provide homes in more rural locations has been investigated and there was no clear evidence to justify expansion to existing settlements. The Plan therefore has provided the opportunity for exception sites where such justification can be produced.

Viability and Deliverability
The planning system does recognise that sites have unique factors which will result in varied levels of costs. In addition to the abnormal costs associated with each site there are additional factors such as Building Regulations and Code for Sustainable Homes that increase the requirement to builders and therefore affect costs. Such factors are not in the control of the Local Planning Authority and are required by the conditions of the Welsh Government, who take into account the additional costs such new conditions require. Such costs are knowns and as such it is the planning systems role to ensure developments provide adequate levels of education, open space and affordable housing etc. Such costs should be taken into account at the land acquisition stage as much as possible. It is accepted that some sites will have additional costs that are not picked up through the BCIS method which may have an affect on lower value areas but which should not skew a reasonable approach based on a methodology which the house building industry recognise. The planning system has remained flexible in its approach allowing viability assessments to allow for such abnormal costs to be factored in so that the housing market can continue but it should not do so to the detriment of creating sustainable communities.

Chapter 13 of the Revised Deposit Plan and the Delivery and Implementation Background Paper 2013, set out the background to each allocation within the plan. It identifies the anticipated rate of delivery and identifies constraints and planning histories. It must be noted that the majority of residential allocations are in the position of holding planning permissions and as such the level of investigation as to the delivery of the site has been undertaken through the planning application process. There are 9 remaining sites within the plan which are Housing Proposals, these themselves have seen some progression:

i) Mill Street – The site is being marketed by NCC.

ii) East Usk Yard: The site is not anticipated to come forward until the end of the Plan period as Network Rail, the proposers of the site, require the site for rail related uses until the later phase of the Plan.

iii) South Wales Argus – There is a current application being considered by the Council.

iv) Alcan – This site has planning permission for a residential led development and infrastructure and remediation works have commenced.

v) Whiteheads - This site is part of a Welsh Government regeneration scheme, which anticipates delivery to begin in 2016.

vi) Woodlands Site – This site has not been sold.

vii) Herbert Road & Enterprise House - This site is adjacent to the Glebeland site noted above. The site is compliant with the overall strategy of the LDP being a brownfield urban site in need of regeneration. There is no application on the site but the area land owner notes their intention to sell the site for development.

viii) Old Town Dock Remainder – the site has had some landscaping work undertaken and there is a development company signed up to undertake the complete regeneration of the site.
Ix) Bideford Road - This site is compliant with the overall strategy of the LDP being a brownfield urban site with potential for regeneration. There is no application on the site but the area is the remaining part of a housing estate development.

The effects of the economic recessions are still being felt within the housing market so it is therefore of no surprise that the plan anticipates a lower growth in the first period of the plan compared to the final ten years. The Plan does however provide enough land to ensure that a 5 year supply is met and that although the annual build rate is higher than currently achieved, even when taking into account the residual method of calculation, the Council has provided an adequate supply of land which has been agreed with the industry through the JHLAS process.

It is recognised that the required level of affordable housing for Newport cannot be met by the Plan alone. The level of supply which can be achieved through the implementation of the affordable housing policy in addition to those units already secured through the planning process has been clearly set out. It is not the sole responsibility of the planning system to meet the affordable housing requirement however the Plan does set a policy framework in order to achieve the highest level of affordable housing provision possible. Such provision has taken into account the viability of the policy threshold for affordable housing yet remains flexible to ensure that viability can be considered so that the housing market is not stifled by a non-negotiable approach to affordable housing provision.

Flexibility
As the representation notes there is no set flexibility figure required for housing supply within development plans. However, during the examination of the Brecon Beacons National Park LDP WG noted a notional figure of 10% but that needed to reflect local circumstances. Other authorities within South East Wales have a range of 12-20% flexibility. It is good practice to allow for unknowns and the need for flexibility within a development plan is inherent from National Planning Policy. In Newport’s case the majority of the housing supply has planning permission or is being progressed. Those remaining 9 sites without planning permission are in line with the overall strategy or regeneration needs of the plan. Together they provide a 12% oversupply which is considered appropriate to enable plan to cope with uncertainties that may arise over the plan period.

Strategy compliance and delivery.
It is considered that the plan provides a more than adequate supply of housing, both market and affordable, which is both deliverable and viable. Many of the sites have progressed since the Revised Deposit Plan was written and there is a steady supply of housing being achieved across Newport. The Plan identifies its housing and employment land supply for the plan period based on an assessment of need. The clear strategy for the Plan is for growth and it will be through the successful implementation of the policies of the Plan that this will be achieved. There is a clear link between housing supply and economic growth which is why the supply will be monitored annually.
**Representation Details**

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Document: Revised LDP, p.70

Policy: H04

Summary: Dispute 30% affordable housing target.

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CE2, CE3, CE4
1.1 The results of the viability assessment and relationship to the policy

In terms of interpreting the results with a view to identifying an appropriate percentage of affordable housing, we are unsure how the assessment actually arrives at the assumption that 30% is a viable policy target across the authority. In this context, it is clear from the assessment that residual values vary widely across the authority, with distinct differences being recorded in areas such as Caerleon and Rural Newport compared to Newport East and Malpas and Bettws. This in itself poses a particular problem for the local authority, given that Newport East (which covers the wards of Llyswenry and Llanwern), proposes to deliver the majority of the housing over the LDP period and therefore, the potential delivery of affordable housing in these areas will be extremely limited.

In light of this, we believe the affordable housing policy as it stands would have a detrimental impact on the delivery of homes in Newport. When our additional representations are considered below, this will become even more of an issue, which could potential extend into the higher value areas.

1.2 Other section 106 (and other) contributions

Paragraph 3.11 of the viability assessment states that the cost assumed for ‘other section 106 (and other) contributions’ is £5,000 per unit, which is a figure agreed to be appropriate with the local authority. However, the assessment also suggests that such costs could be higher in real terms and in this respect, paragraph 4.6 indicates the potential implications to the assessment if the costs rose to £10,000 per unit.

For instance, the strategy of the LDP relies heavily on the use of planning obligations to rectify the constraints and barriers to development, as well as providing benefits such as education, transport and open space facilities etc. Given that a vast majority of the sites allocated for development within the LDP have many constraints, it is likely that additional costs will be required in order to remedy these constraints, which will either be secured via section 106 contributions, or will impact on the ability to secure such contributions.

In addition to this, we believe it would be rather ineffectual to simply rely on what has been achieved in the past as a marker for the level of planning obligations to be secured in the future. Clearly the LDP will require more subsidies via section 106 in the future, in order to ensure all its requirements can be met. The requirements of National Guidance are also becoming more onerous than in previous times, with the prospect of public funding available to support delivery at record low levels. Therefore, it is highly likely that the level of funding for planning obligations required in the future will be far greater than that which was required in the past. In light of this, we believe the assessment should build in additional flexibility and should assume the £10,000 planning obligations threshold as the minimum default requirement for other section 106 contributions in the future.

1.3 Relationship of the viability assessment to the LDP Strategy

We believe it is important for the viability assessment to properly reflect the nature and composition of the LDP strategy if it is going to make a sound assessment of the level of affordable housing that can be delivered on the sites proposed. However, after studying the viability assessment and the LDP strategy, it is clear that the assessment methodology does not bear any relationship to the strategy of the LDP. In this respect, paragraph 3.2 of the viability assessment states that the analysis for the level of affordable housing that can be delivered is based on a notional 1 hectare site. The assessment also assumes that this 1 hectare site is free from constraints and does not provide any latitude to include the potential cost of remediating constraints to development where this might be necessary. However, as we can see from Policy H1, the nature of the test-case site does not correspond in any way to the proposed allocations, with the vast majority of the allocations being brownfield sites with significant constraints to development.

Clearly if the cost ofremediating constrained sites is to be borne by land values, reference to this must be included within the viability assessment in order to ensure the level of affordable housing assumed to be viable is sound and robust. The Council might argue that it would be difficult to include such site specifics in a high level assessment, however, what use is an assessment to inform the delivery of affordable housing, which is based on a type of development that is not proposed to be delivered in Newport?

In our view, it the assessment relates directly to the delivery of affordable housing on the allocated sites within Policy H1 and existing commitments, and these sites require significant financial contributions in order to remediate the constraints to delivery, the viability assessment has a clear obligation to take this into account.

In light of the above, we believe the viability assessment has been undertaken without due consideration of the LDP strategy and as such, the level of affordable housing suggested by the assessment is highly questionable, given the difference between nature of development proposed within the LDP and the nature of development assumed by the assessment.

2 The additional requirements of development
In the context of delivering housing development on the ground, it is clear there will be requirements of any development that will need to be satisfied to ensure it can be physically delivered. In most cases these requirements come in two forms, the physical constraints of a development that need to be resolved, and planning obligations or regulatory requirements that are essential and must be adhered to (e.g. the requirement for physical infrastructure such as roads, sewers and the requirements of building regulations etc.). In terms of delivering housing, the LDP specifically allocates constrained land for development, which essentially means the additional costs incurred when delivering these sites will also have to be prioritised, over and above those costs associated with delivering planning obligations and other regulatory requirements (where possible). Therefore, when considering the delivery of affordable housing, there will clearly be many planning, regulatory and other development requirements that will need to be prioritised, before any priority is given to the delivery of affordable housing, despite the assertion within the assessment that the Council could simply renegotiate all other requirements to make developments viable.

In terms of the above, these principles for prioritisation are completely missing from the affordable housing viability assessment, which we believe leaves a considerable hole in the soundness of the assessment and its recommendations. Firstly, it is clear that the assessment has been undertaken on a notional one hectare site, which is free from any development constraints and therefore, if the LDP prioritises the delivery of constrained sites, it seems logical that the assessment should recognise this and provide some leeway in the assessment to allow for such costs. Examples of the types of works experienced are:-

- If there is a need for the ground to be remediated/consolidated, this will necessitate a raft foundation, which is a significant additional cost, and very common on development sites in Wales.
- If ground has been remediated, then a capping layer of inert safe material will need to be applied, which has to be imported in.
- If gas pipes are present at the site, then gas membranes will be required at significant cost.
- Drainage and onsite attenuation – attenuation tanks are now required on all sites with a rough cost of £80k for one tank. One of our members reported that on a 250 unit greenfield site, they were required to install 9 tanks, which resulted in a cost of nearly £3k per home or £750,000 for the whole development.
- Land profiling, particularly on hilly areas will attract extra costs for cut and fill to ensure the foundations can be accommodated. Again raft foundation will be required here.

The list above is just a short list of the additional works that our members stipulate are becoming the norm on nearly all sites (both greenfield and brownfield) they develop in Wales. However, given that the vast majority of the land being proposed for housing development in the LDP is brownfield and has significant constraints, it is likely that the list above would be more extensive and significantly costly. In addition to this, and crucially with respect to the affordable housing viability assessment, these costs are not picked up by the BCIS, as they would be dealt with under a completely separate contract. As such, it is clear that the current build costs within the affordable housing viability assessment, will not allow any flexibility to account for these requirements.

As we have stated above, we are concerned with the lack of consideration given to the additional works and extra costs that will be required on developments. As such, we believe it will be necessary to include sufficient flexibility in the affordable housing viability assessment to ensure these costs can be dealt with.

In order to inform the likely cost of these works, we recently undertook a consultation exercise with our membership to try and ascertain the appropriate cost to assume. From this consultation exercise, we received a number of examples of the costs associated with these extra works, some of which were estimates, whilst others were actual costs taken from recently developed sites in Wales. In summary of figures, these were ranged from £115k per acre (£286k per hectare) for more straightforward sites, to over £400k per acre (nearly £1m per hectare) for more difficult sites. On average however, from the list of sample sites that were provided and from the comments we received, the average cost of these additional works was considered to be approximately £220k per acre or £543,400 per hectare. A list of the sample sites and costs received as a result of our exercise is provided within Appendix 1 below.

Further to the above, we also received reports from Intégral Géotechnique and Arup outlining a summary of the typical costs of remediating sites in Wales. We enclose a copy of both reports in Appendices 2 and 3 below. As you can see from these reports, the organisations are professional consultancies that specialise in site remediation and the redevelopment of housing sites. Both organisations have extensive experience and expertise in developing land in many areas of Wales for a variety of different clients and therefore, we have no doubt that the cost estimates provided within these reports are robust and accurate.

In terms of figures, as you can see from the reports the typical costs provided for site remediation and addressing constraints ranged from between £175k per acre and £325k per acre, which on average works out at £250k per acre or £617,500 per hectare. However, it is evident from the advice given within the reports that due to topography and the general nature of development sites in Wales, the actual costs could be well in excess of the figures quoted. As such, and given the nature of the sites proposed in the LDP, we believe assuming a cost of £250k per acre (or £617,500 per hectare) for addressing the extra works and site remediation/constraints required on developments would be entirely reasonable.

Further to the above, as part of our work on the Community Infrastructure Levy, we are beginning to gather specific market intelligence on the additional costs of developing sites in particular areas of Wales. In this respect, as part of our work on the RCT CIL, our members have provided us with five recently constructed housing sites, along with the ‘additional costs’ that were experienced on these sites. This information is set out below.

The sites provided to us were as follows:-

- Brownfield sites for 49 dwellings
- Brownfield site for 72 dwellings
- Brownfield site for 137 dwellings
- Greenfield site for 88 dwellings
- Greenfield site for 97 dwellings.
In terms of the sites above, none of the three brownfield sites suffered significant contamination but required (in part) demolition, some remediation, service diversions, on-site attenuation, pumping stations, raft foundations, asbestos removal, importation of clean capping layer and raising levels for flood mitigation. In this respect the level of extra costs were £183,000 per net hectare, £326,040 per net hectare and £333,450 per net hectare respectively.

Interestingly, the two Greenfield sites provided required much higher levels of extra works and costs, which amounted to £449,450 per net hectare and £1,217,710 per net hectare respectively. It should also be noted that the costs described above are in addition to the standard infrastructure and utilities works required (often referred to as ‘external works’) in general housing development. As you can see from the information above, the average cost of extra additional works on the brownfield sites amounted to £284,150 per hectare. However, for the greenfield sites the average cost was £833,580 per hectare. This, we believe, not only supports our suggestion for the assessment to include an allowance for the extra additional costs of development, but also demonstrates that such costs can be experienced despite the nature of the development site i.e. brownfield or greenfield. In the light of the above, we believe it is unreasonable and inappropriate for the viability assessment not to recognise that there will be extra works and additional costs required on all developments in Newport.

Our members are clear that in the vast majority of cases, the existence of additional works is now very much the norm with respect to development in Wales. It is now virtually unheard of that a site (both in terms of greenfield or brownfield) is able to be developed without the requirement for significant additional works and hence, significant additional costs. However, given the nature of the sites proposed in the LDP, it is clear that these works will be required in all cases and will generate considerable additional costs. As such, given the affordable housing viability assessment is based on a site that ignores these costs, we do not believe it provides a sound basis with which to assess the potential viability of the affordable housing targets chosen.

Given our evidence above, we believe the affordable housing viability assessment should include additional flexibility to ensure the requirement for these additional costs can be addressed, alongside any affordable housing requirements, when delivering development on the ground. In light of our evidence above, it is clear this cost varies widely depending on the site in question, however, we believe as an average, including a cost of £617,500 per hectare would be entirely appropriate.

Therefore, in light of the evidence above, we believe the affordable housing viability assessment should allow a minimum viability buffer of £617,500 per hectare. Provided the affordable housing policy itself is sufficiently flexible, this should help to provide increased flexibility to mitigate the cost of these essential additional works.

3. Changes to Part L of Building Regulations and Fire Sprinklers

Further to the above, the assessment has also omitted two substantial costs to development of housing in Wales, which are required as a result of national guidance; namely the proposed changes to Part L of Building Regulations and the requirement for fire sprinklers in all new homes.

In terms of these two issues, the Minister recently released a statement on house building in Wales (17th July 2013). Through this statement the Minister stated that the proposed change to Part L of Building Regulations will require an 8% improvement over Part L 2010. The Welsh Government has stated that this requirement is still being considered with respect to its cost on development and therefore, we believe it is prudent to leave sufficient flexibility in the land value of the viability assessment to ensure this requirement can be accounted for.

In terms of the requirement for sprinklers, the Ministerial Statement stated that this requirement will be introduced for all new homes in Jan 2016. The Welsh Government’s evidence on this requirement demonstrates that this could cost (on average) £3,075 per plot. However, given the requirements of the British Standard, we believe the actual cost could be well in excess of £5,000 per plot. The Welsh Government are also currently considering this requirement and its impact on land values and therefore, we believe the viability assessment should also leave sufficient flexibility to ensure this requirement can be delivered.

4. Summary of additional costs omitted from the assessment

Considering the issues above, it is evident that the assessment has potentially omitted the following costs on housing development:

- Cost of site remediation works = £617,500 per hectare
- The potential cost of future planning obligations = an additional £5,000 per plot or £150,000 over a 30 unit development
- The cost of achieving the proposed changes to Part L of building regulations = as yet unknown
- The cost of installing fire sprinklers = £5000 per plot or £150,000 over a 30 unit development

Total cost = £917,500 per hectare (assuming 30 units per hectare and not including the potential cost of Part L changes)

5. The potential impact of these omitted costs on development viability

In terms of the above, it is evident that the assessment has potentially underestimated the cost of developing land in Newport by potentially more than £1m. This will clearly have a major impact on the viability of development in many areas of the authority, particularly in areas such as Newport West and Newport East, which have some of the lowest land values, yet are expected to deliver the greatest volume of development.

For example, if you consider Newport East which is the area containing the wards of Llanwern and Llyswnery, and you subtract the figures above from the residual land value at 30% affordable housing and 30 DPH provided for Newport East within the viability assessment (£900,000 per hectare), the resultant land value is £857,500. To further highlight this point, if you also subtract the value from residual land values in Caerleon (£1,080,000), the resultant land value would be £162,500. Again, we must stress that this calculation does not take account of the potential cost of the Part L changes. Therefore, it is clear that development in many areas of Newport would be completely unviable at 30% affordable housing if all these costs are accounted for, given that land values would fall into negative territory. In fact, when these costs are included, land values fall into negative values in the areas that are proposed to deliver the majority of development, which is clearly a major issue that has not been addressed by the assessment.

In light of the above, we believe the affordable housing viability assessment is not based on up to date and robust evidence. We believe assessment has omitted a number of key requirements that will impact on the cost and viability of developing homes in Newport, particularly in the areas that are proposed to deliver the majority of the housing over the LDP period.
In light of the evidence above, we do not believe the affordable housing viability assessment has properly considered the cumulative impact of the cost of the physical requirements of development housing, in addition to the requirements of essential planning obligations and the imminent changes to building regulations. It is clear from our evidence that the impact on land values would be witnessed more acutely in the areas where the majority of housing is proposed, which would therefore have a detrimental impact on the delivery of affordable housing in those areas and also on the delivery of any overall housing strategy of the LDP.

In light of the above, we believe Policy H4 is not based on robust and credible evidence and is not sufficiently flexible in order to ensure it can be delivered on the ground. Therefore, Policy H4 contravenes Soundness Tests CE2, CE3 and CE4 and implementing the changes set out below would help to satisfy these soundness tests.

7. Suggested Changes

7.1 In light of the evidence above, we do not believe the affordable housing Policy H4 should be adopted in its current form. We believe it will have a detrimental impact on development viability and hence the delivery of housing in key areas of Newport. This will also impact on the overall target for affordable housing delivery set by the LDP. The evidence for the policy should be revisited and the issues within our representation above should be taken into account when undertaking the affordable housing viability assessment. The policy should then be re-drafted when this work has been completed.

7.2 Finally, given our concerns above, and the likelihood of additional evidence to justify our concerns being made available in the run up to the LDP examination (particularly on the impact of Part L changes and sprinklers on land values) we respectfully reserve the right to comment further on this policy and the viability assessment through the Examination process.

12 12 Speaking at Public Examination

We believe that more information needs to be provided on this issue and more evidence will become apparent in the run up to the Examination. Therefore, we respectfully reserve the right to consider this evidence at the Examination rather than to rely on written representations at this stage.

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<th>Council Responses</th>
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The Viability Report (March 2012) states (Para 7.18) ‘There is no detailed guidance setting out how targets should be assessed, based on an assessment of viability. An assessment of viability for policy setting purposes might have reference to a range of factors including: past and recent delivery of affordable housing, residual values, the relationship between residual values and existing use values, what has been found to be robust targets in similar authorities through the Local Plan process, the land supply equation and its relationship to the policy weight given to affordable housing delivery in the wider context of housing supply generally. To some extent land owner expectations are also significant. The experience of the consultant, working in conjunction with the local authority and through developer workshops helps to arrive at a robust policy stance.’

Feedback from the workshop suggested land value benchmarks of around £250,000 per hectare. On this basis, the Council would be setting affordable housing targets at between 40% and 60% for large parts of Newport. The figure of around £250,000 is supported in DCLG research:

http://www.exeter.gov.uk/CHttpHandler.ashx?id=16165&p=0

Theory of Section 106 and land valuations:

This point has previously been made by the HBF. The ‘Existing Use Value Plus’ approach is ingrained in case law and precedent and therefore has by past the best pedigree in determining appeals and LDP development.

It is thus the correct approach and the only one which accords with the ethos of the Section 106 process.

Even alternative guidance, such as that produced by the RICS (and which largely rejects EUV Plus), stresses the importance in developers only paying land owners what their sites are worth once policy impacts have been taken into account.

Other Section 106 contributions:

There seems to be some confusion here with abnormal costs (dealt with below). The £5,000 per unit covers formal requirements. It is accepted however that these figures could be both higher or lower.

Experience in running updates of AHVSs elsewhere (good example Conwy CBC examined earlier in 2013) suggests that the planning obligations package actually reduced rather than increases (in that case from £5,000 to £3,000 per unit).

Yes, it is likely that there will be a shortfall to infrastructure requirements. This is the case for most local authorities. Ongoing work on CIL should knit together these issues.

Viability approach and the LDP:

The HBF were party to the development of good practice guidance:


They sat in the relevant meeting, were fully supportive of a notional site approach and indeed of the use of the DAT (Development Appraisal Toolkit). The City Council have simply followed that agreed Good Practice.

It is accepted that some sites will have additional costs that are not picked up through the BCIS method which is promoted in the DAT as a benchmark. However, what the HBF do not mention is that the volume house builders in many instances can cut costs significantly lower than BCIS in so far the normal costs are concerned.
Normal costs are normal costs, and the basis to set policy. Abnormal costs reflect unusual circumstances, and hence are not a basis for setting policy. It is an almost universally agreed principle that policy is not set according to the worst possible assumptions.

In the case of Newport, policy has been reasonable and fair and there is a proper recourse to site specific negotiations where these are needed.

The evidence produced by the HBF is atomistic. There is no certainty at all that it is representative of sites in general and the information does not cover feedback we believe from smaller developers and land owners. The figures used in the Newport Affordable Housing Viability Studies are very generous. They make allowance for base build costs which are likely to be above house builders (in particular those represented by the HBF) whilst making an additional 15% allowance for infrastructure and external works.

The approach tempers the costs to local circumstances by using the Newport CC location factor which can be derived from BCIS.

Changes to Part L & Sprinklers:

The full comment from Minister Carl Sargeant states that: 'I have concluded that I will introduce, through amendments to Part L, a requirement to reduce greenhouse gas emissions by 8% from 2010 levels. This is lower than the 40% originally consulted upon. I believe that this constitutes a balanced approach - improving our emissions position without undermining the objective to build. It provides regulatory backing for reductions which are currently sought through planning guidance. This will support more consistent delivery across the housing market, whilst having a close to cost neutral affect on building costs. I believe this is important given the nature of the current housing market and the need to stimulate housing supply and get builders building. In addition, this approach does not prevent voluntary implementation of further increases in energy efficiency by the industry.

The key statement here is, ‘This will support more consistent delivery across the housing market, whilst having a close to cost neutral affect on building costs.’

If the housing market in any way follows past performance (and in many parts of the UK this is already happening) then we see significantly improved viability during the period of implementation of Part L. Meanwhile, fire sprinklers will be introduced to high risk properties from April 2014 (care homes, new shared student accommodation, hostels etc) but will not apply to new and converted houses and flats until January 2016. Again, the direct quote is to give... the sector the opportunity to innovate and reduce the costs of installing sprinklers."

It’s important for HBF to recognise that ‘land value’ is not part of the appraisal process. The appraisal process seeks to establish the extent to which developers have taken policy into account. If the policy has to be flexible to land owner expectations than sites will simply stall. This is not the Council’s fault unless it has set policy too ambitiously. In the case of Newport this is not the case.

Additional costs ‘omitted’:

The comments above here are important. We do not believe that base build costs from HBF members are as high as BCIS in many instances. This means that although there will become additional costs, these will be balanced out in large measure.

Remediation works. These figures are largely unsubstantiated, and if they are correct there is a large ‘reality gap’ between what is being delivered across Wales and what the (HBF) figures show. The ‘reality gap’ issue was aired extensively at both the Conwy and Torfaen LDP Examinations and the problem understood by the Inspectors.

Costs of future planning obligations – as previously set out, these, subject to further scrutiny, are likely to go down and not up. And in principle we are assessing in the here and now, and not in the future.

Changes to Part L – these are not ‘as yet unknown’ (as stated by HBF). WAG are very clear that these pose no threat to viability.

Potential impact on omitted costs:
There are two issues here. First, costs are uncertain. The appropriate place to deal with these is a) through site specific negotiations and b) through the rate of return given to developers. The HBF have agreed to the margin included in the DAT and should therefore have no further concerns. There are sufficient ‘escape valves’ in the process to allow for satisfactory resolutions to viability matters.

Second, the analysis assumes both average costs as well as average values. Inevitably, there will be hot spot areas where values are significantly higher than assumed. It is accepted that greater flexibility will have to be applied in lower value areas such as Newport East, Malpas and Bettws. However, there will undoubtedly be sites where the economics are more favourable and the policy will be sustainable.
### Representation Details

**Document:** Revised LDP, p.21  
**Policy:** SP06  
**Summary:** Question what evidence base has been provided to support green belt extension.

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<td>10.10</td>
<td>Soundness Test</td>
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**Soundness Test CE2**

If the green belt has been extended then surely this should be evidence based. In view of the restrictions on development enforced through the green belt policies within the LDP, a thorough review of the green belt should be undertaken to ensure any extension is appropriate, before any changes are made to the designation.

At present, the policy is not based on robust and credible evidence and therefore contravenes Soundness Test CE2.

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<td>2.2</td>
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**Council Response**

No change. Newport Unitary Development Plan 1996-2011: Inquiry Report – The Inspector stated that with the strong development pressures on the land between the two cities and the narrowness of the undeveloped gap between them there is a need to establish an area of Green Belt between Newport and Cardiff in order to keep this land permanently open. This approach is supported in PPW para 4.7.1.

The reason given in the LDP for the extension to the M4 is that the motorway provides a more logical and distinct boundary. In light of continued pressure to develop the area it is considered justified. Pressure includes internal pressure from within the authority and outside. The Cardiff City Council Preferred Strategy has indicated a strategic housing (500+) and strategic employment site in the north east of the city near the proposed extended area of green belt, adding additional development pressure on the area.
Summary: Land to the west of the A4042 should be removed from the Green Wedge to allow development.
1.0 INTRODUCTION

1.1 This submission primarily concerns a site which was submitted at the Candidate Site stage and given the reference AS(N)041. In order to place the site in its proper context and describe the opportunities it offers it is necessary to explain its relationship to adjoining land. What follows is best read in conjunction with the drawing attached at Appendix 1.

1.2 The original Candidate Site (ref AS(N)041) forms part of a swathe of land bounded by the A4042 to the east and the residential estate of Claremont and Pilton Vale to the west. Extending from Pillmawr Road in the south, almost to the junction of the A4042 and A4051 in the north. However, Candidate Site AS(N)041 is effectively landlocked unless vehicular access can be obtained from either the north or south.

1.3 The land to the north of the Candidate Site, which is owned by associates of my clients, falls within the administrative boundary of Torfaen CBC. It was itself a considered as a Candidate Site during the emerging Torfaen CBC LDP and was the subject of an accompanied site inspection by the Inspector. Should this land be included as a residential development site in the Torfaen LDP, then satisfactory vehicular access can be obtained from it to the land that falls within Newport CC’s boundary. In which case, the allocation of Candidate Site AS(N)041 would be a natural development extension to the land lying in Torfaen.

1.4 With regard to the land lying to the south of Candidate Site AS(N)041, it is understood to be owned by the City Council and is used as informal leisure/open space. This land could provide a development opportunity for the City Council, as well as access to my clients land to the north, therefore Candidate Site AS(N)041 has been extended to include it.

1.5 A sustainability assessment in respect of Candidate Site AS(N)041 has already been prepared by the City Council and therefore a further sustainability assessment has not been prepared for the extension to it now proposed.

2.0 OBJECTIONS

2.1 Two objections to the Revised Deposit LDP have been lodged in respect of this site. This one seeks its removal from the Green Wedge, while the other seeks its allocation as a residential housing site. It is appreciated that an objection seeking the sites inclusion within the Settlement Boundary could also be made, but it is assumed that the line of the Settlement Boundary would be altered automatically to reflect the sites allocation for housing should that be the case.

3.0 GREEN WEDGE – POLICY SP7

3.1 Paragraph 4.8.1 of PPW (Planning Policy Wales, Edition 5, November 2012) stipulates “Both Green Belts and green wedges must be soundly based on a formal assessment of their contribution to urban form and the location of new development and can take on a variety of spatial forms.” (emphasis added) Apparently, Newport CC has not undertaken a formal assessment to support the identification and extent of the Green Wedges included in the emerging LDP.

3.2 At paragraph 4.8.12 it goes on to advise that “In defining green wedges it is important to include only land that is strictly necessary to fulfil the purposes of the policy. Factors such as openness, topography and the nature of urban edges should be taken into account. Clearly identifiable physical features should be used to establish defensible boundaries.”

3.3 In this instance it is plainly evident that the whole of the land lying to the west of the A4042 is both physically and visually divorced from the land lying to its east. It is the A4042 that provides a clearly identifiable physical feature and it is which should be used to establish a defensible boundary to the Green Wedge, if such a designation is considered necessary.

3.4 At paragraph 2.25 of the LDP (Revised Deposit Plan, June 2013) the local planning authority explain, “That the areas designated tend to have significant importance for their openness and for their role in maintaining the distinct identity of separate communities.” I would argue that a tendency towards openness and maintaining the distinct identities of separate communities is not an appropriate test given the advice contained in PPW. It is the actuality of the situation in each and every location where a Green Wedge is proposed that needs to be assessed. A requirement that the local planning authority has failed to undertake.

3.5 The actual boundary between Newport and Torfaen in this location is archaic. It follows a stream that few know of and even less have ever seen. The administrative boundary in this locality was effectively bridged by development many decades ago and maintaining the fiction that a meaningful gap along the boundary between the two councils still exists serves no practical or town planning purpose.
4.0 CONCLUSION

4.1 The local planning authority has failed to comply with government advice in assessing the location and extent of Green Wedges. Instead, they have merely perpetuated what went before. Had the correct tests been used as specified in PPW it is, in my opinion, inconceivable that anything other than the A4042 would be used as the boundary to a Green Wedge in this locality. In which case the land to the west of the A4042 would be excluded from the designation.

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12. Speaking at Public Examination

12.1 Council Response

No change. The site is designated as countryside and green wedge and part of the land (part of the site within the ownership of NCC) is designated as environmental space. No comment has been made in relation to the countryside designation. The ‘alternative’ site forms part of a larger area designated as Green Wedge which sits on the northern boundary of the authority with Torfaen. This section forms part of a larger Green Wedge between the northern limits of Newport and the southern limit of Cwmbran. Along with the Green Wedge allocated to the north of Bettws (SP7 (iii)) and corresponding Green Wedge allocated in the Torfaen LDP form a larger area of Green Wedge between two settlements. Whilst it is conceded that a formal assessment of the various Green Wedge allocations was not conducted the Green Wedges were carried forward from the Unitary Development Plan. The Inspector at the Unitary Development Plan Examination stated that the site east of Claremont is set against the edge of the built up area of Claremont and contained within the line of the A4042 Malpas Relief Road. While it does not appear to be in agricultural use it consists of open grassland separated by hedgerows and contains a wooded watercourse. In its undeveloped state it helps to maintain the separation between Malpas and Cwmbran and considered the Council was correct to designate it a Green Wedge.

In addition to the comments made at the Unitary Development Plan examination, it is considered that the allocation of this area is in accordance with the purpose of Green Wedge as set out in Planning Policy Wales. The area of land does serve to prevent the coalescence of two settlements (Newport and Cwmbran), assists in safeguarding the countryside from encroachment, and protects the setting of an urban area.

It is also considered that the allocation of this area is in accordance with Planning Policy Wales in that normal planning and development management policies cannot provide the necessary protection (a countryside designation would not have the same level of control over certain types of development, for example, extensions to houses). It is considered that only land that is strictly necessary to fulfill the purposes of the policy has been provided in the designation based on the purpose of Green Wedge as identified in PPW.

Piecemeal removal of parts of the Green Wedge within the boundary of Newport would serve to undermine the intention of the various Green Wedge designations in both authority areas. It should be noted that the Inspector has declined to include the adjacent site in Torfaen’s LDP.
### Representation Details

**by:** (No grouping)
**Filtered to show:** (all of) Stage=L; Status=M

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**Document:** Revised LDP, p.65  
**Policy:** H01  
**Summary:** Land to East of Claremont & Pilton Vale should be added to H1  

**Additional material submitted - Please click here**

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12/02/2014
Reduction Details

11 11 Representation

Reasoned arguments, together with a plan are attached.

1.0 INTRODUCTION

1.1 This submission primarily concerns a site which was submitted at the Candidate Site stage and given the reference AS(N)041. In order to place the site in its proper context and describe the opportunities it offers it is necessary to explain its relationship to adjoining land. What follows is best read in conjunction with the drawing attached at Appendix 1

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2.0 OBJECTIONS

2.1 Two objections to the Revised Deposit LDP have been lodged in respect of this site. This one seeks its allocation as a residential housing site, while the other seeks its removal from the Green Wedge. It is appreciated that an objection seeking the sites inclusion within the Settlement Boundary could also be made, but it is assumed that the line of the Settlement Boundary would be altered automatically to reflect the sites allocation for housing should that be the case.

3.0 RESIDENTIAL LAND ALLOCATION

3.1 The site lies in a landscaped environment close to existing employment and community facilities found within Malpas, Newport and Cwmbran. Its location is a natural extension to the settlement of Malpas and is constrained from further expansion by the presence of the A4042. Should the land to the north not be allocated for residential in the emerging Torfaen LDP, then access into the development area can be taken from Pillmawr Road to the south and through the land owned by NCC, generally along the line of the existing 2 metre wide footpath/cycle route. Although this route will cause some disruption to the existing landscaping within the land owned by NCC, it will also afford NCC the opportunity of developing its land for residential purposes. Such development could take the form of pockets of residential land within the existing landscape, thereby maintaining a linear park like setting.

3.2 The linear park could be extended up to the boundary with Torfaen CBC, possibly beyond if the adjacent land within Torfaen is allocated for residential development. This would provide the opportunity of extending the long distance cycle/walking route, which already utilises part of Pillmawr Road to the south of the site, thorough the linear park and possibly beyond to the canal that lies to the west of Malpas. With a little foresight and cooperation between the two councils, such an addition to the long distance cycle/walking route would not just of benefit to those resident in the immediate vicinity, but could form an important link in the long distance cycle/walking network.

3.3 In terms of the potential impact on the existing highway infrastructure, a certain amount of traffic generation is of course inevitable; however, it is considered that the local highway network has the capacity to satisfactorily accommodate the additional traffic movements generated, and there would not be an adverse effect on existing traffic flows or arrangements.

3.4 The site can be developed without adverse impact on neighbouring land uses with limited impact upon views of the surrounding area. There appear to be no insurmountable physical constraints to development. The site would be available for immediate development. The site lies alongside an existing bus route and is within walking distance of many local and community facilities. These include
4.0 CONCLUSION
4.1 The development of this site would make effective use of marginal land that is constrained due to the presence of adjoining A4042, which is a prominent physical feature and a more natural and defensible boundary to this part of Newport. Development of the land also provides the opportunity to fund and facilitate the creation of a linear park and cycle/footpath that could integrate with the existing routes in the locality thereby adding significantly to options available in the area to cyclists and walkers.

4.2 It is therefore, considered that the development of the site for residential development and parkland in conjunction with the land owned by NCC located to the south provides an appropriate extension to Malpas, which would integrate well with the existing urban area while providing choice in the local housing market.

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12/02/2014 Page 137 of 1581

12  Speaking at Public Examination

Item Question  Council Response

2  Soundness of LDP

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13  Council Response

The site at Claremont is located outside the settlement boundary within Countryside and Green Wedge and a Site of Importance for Nature Conservation (SINC) runs through the site. The main purpose of a Green Wedge is to prevent coalescence between urban areas. The allocation should be retained to maintain an area of open land between Newport and Torfaen, particularly given the development pressure experienced on both sides of the administrative boundary in this location.

The plan seeks to promote the reuse of Brownfield sites in preference to extensive use of Greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities.

The forecast housing need has been assessed in the context of population and employment projections and current market realities. The plan allocates sufficient land to meet this requirement. Additional housing allocations in a rural location cannot therefore be justified. Furthermore, the release of the representation site for housing would be contrary to the Council’s strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

The site at Claremont is located immediately adjacent to the settlement boundary and is greenfield and has the potential to impact upon a locally significant ecological designation. Development at this site would impact upon the area deemed appropriate to protect the area between Newport and Torfaen to resist coalescence. In addition the site does not reflect the underlying brownfield strategy for the plan and it is therefore recommended that this site is not included in the Local Development Plan for residential purposes. An adjacent site located in the Torfaen local authority area, was put forward as a site for inclusion in the Torfaen LDP. The site was not included.
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<th>Rep'n/Para/Policy</th>
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<th>Agent</th>
<th>Accession No</th>
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<td></td>
<td>01/08/2013</td>
<td>E</td>
<td>M</td>
<td></td>
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Document: Revised LDP, p.79
Policy: EM01.04
Summary: Amend boundary of Solutia site

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<th>Representation Text</th>
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<tbody>
<tr>
<td>11</td>
<td>The map currently on the website does not reflect what I submitted to NCC last year, nor to your consultant. I don't think the area is 45ha.</td>
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<tr>
<th>Item Question</th>
<th>Council Responses</th>
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<td>13</td>
<td>It is understood that the proposal for EM1 (iv) goes beyond the ownership of Solutia, however the proposals within the LDP are not solely based on land ownership. Removing part of a proposal at this stage of the Plan may constitute a focussed change which would require further consultation. It is considered that sufficient land is allocated for Solutia and if the proposal contains an area of land not currently within Solutia's ownership, then this will not harm Solutia's ability to develop within the Plan Period. A change to the boundary is not considered necessary. A refinement to the boundary can be considered at examination if considered necessary.</td>
</tr>
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</table>
Item Question  Council Responses

11 Representation
I have had many representations from constituents in Always and Ringland over the proposed Gypsy traveller sites in Hartridge Farm Road and the contingency site at the former allotments and have also met with the Ringland Matters Group. I am therefore in no doubt about the strong feelings felt in the community about these proposals.

I am writing to make you aware of the concerns expressed to me:
- They believe that the LDP plan could be submitted with a provision that the Council, with the residents, are continuing to resolve the provision of sites over a period of time.
- Size of the site - The site is clearly very large by anyone’s standards with the capacity to hold up to 129 caravans. Residents concerns about the site are that it will be one of the largest in the UK if the LDP is to go ahead.
- Residents have also raised concerns about the existing congestion in this area being made worse by additional traffic near the schools.
- Process - There is concern that they were initially told that there was a scoring system used to assess sites. But on questioning it was found that a traffic light system was used and that this was considered by residents to be too simplistic to adequately assess the site. They feel there should be reconsideration based on a more sophisticated scoring system.

Gypsy Travellers Views - Residents feel that the Gypsy Traveller families themselves consider this site to be too large and would prefer smaller sites. They understand that the consultation conducted with gypsy travellers gave them the options of this site or 6 others that were not suitable as they would have been insufficient to allow families to stay together. Ringland residents feel that clearly if it’s this or nothing the choice will be this but that this was therefore not a consultation rather an ultimatum.

13 Council Response
The Council has a duty to identify the need for gypsy and traveller sites, and to find sufficient land to meet the land. The LDP must provide sufficient land to meet the identified need arising during the Plan period.

It is acknowledged that the size of the Hartridge Farm Road site is larger than Welsh Government guidance suggests, however this will avoid the need to split any of the individual families, which is an important factor for the families themselves. The size is sufficient to accommodate all 3 families, which would meet Newport’s residential need for Gypsy/Traveller provision. The proposed layout would use screening to effectively create 3 independent sites within the curtilage of the whole site. The site would also be screened from the road and nearby residential properties.

The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.
### Representation Details

**Rep'n/Para/Policy** | **Representor** | **Agent** | **Accession No** | **Date Lodged** | **Late?** | **Source** | **Type** | **Mode** | **Status** | **Status Modified**
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196.L1//SP22 | Mineral Products Association | | 26/07/2013 | E O I M |

**Document:** Revised LDP, p.36  
**Policy:** SP22  
**Summary:** Provide amendments to policy SP22 to align with national policy and RTS.

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<td>10</td>
<td>Soundness Test</td>
<td>C2, CE1, CE4</td>
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Introduction

The Mineral Products Association (MPA) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and silica sand industries. With the recent addition of The British Precast Concrete Federation (BPCF) and the British Association of Reinforcement (BAR), it has a growing membership of 450 companies and is the sectoral voice for mineral products. MPA membership is made up of the vast majority of independent SME companies throughout the UK, as well as the 9 major international and global companies. It covers 100% of GB cement production, 90% of aggregates production and 95% of asphalt and ready-mixed concrete production and 70% of precast concrete production. Each year the industry supplies £9 billion of materials and services to the £120 billion construction and other sectors. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors.

Given the NPPF’s recognition of the economic and employment benefits of the extractive industries (paras 28 & 144) we should like to direct your attention to ‘Making the Link’, a document produced by the MPA to highlight the contribution that the sector makes to the economy. The document can be downloaded from the following website.


Having reviewed the document we have the following comments to make

MPA Comments

Policy SP22 - MINERALS

1. MPPW paragraph 17 states that authorities should include policies in their development plans for the maintenance throughout the plan period of landbanks for non-energy minerals which are currently in demand. References to ‘landbank policy’ occur again in this paragraph twice. This is a clear statement in national policy that references to landbank need to form part of a policy and by implication that it is not appropriate to merely relegate this to the supporting text or to a background paper. This is because the most fundamental reason for a local development plan for minerals is to provide for a steady and adequate supply of minerals and this can only be expressed in quanta. Although the plan text usefully mentions the current situation in respect of landbanks, unfortunately the plan remains unsound because it does not mention landbanks (and how this has influenced levels of provision) in the policy in accordance with national policy.

2. We believe the policy should make clear that because of the limited resources in Newport, the mpa can only make a small contribution to wider aggregates demand regionally through extraction, whilst continuing to make a larger contribution through its existing wharves.

3. In addition, the policy needs to be robust enough to reflect the conclusions of the forthcoming RTS2 exercise, which will hopefully be published in time for the Examination of the Plan.

4. We therefore seek the amendment of the plan as follows. (insertions in bold; deletions in strikethrough)

THE PLAN WILL FULFIL ITS CONTRIBUTION TO THE REGIONAL DEMAND BY:

(i) CONTRIBUTING TO AN ADEQUATE SUPPLY OF AGGREGATES AS FAR AS LIMITED RESOURCES ALLOW AND BY PROTECTING EXISTING AND POTENTIAL WHARVES AND EXISTING RAIL INFRASTRUCTURE AT NEWPORT DOCKS;
(ii) SAFEGUARDING LOCALISED POTENTIAL HARDROCK AND SAND AND GRAVEL RESOURCE BLOCKS;
(iii) PROTECTING EXISTING AND POTENTIAL WHARVES AND EXISTING RAIL INFRASTRUCTURE AT NEWPORT DOCKS TO ENSURE THE CONTINUED SUSTAINABLE TRANSPORTATION OF AGGREGATE; (all deleted)
(iv) ENCOURAGING THE USE OF SECONDARY AND RECYCLED AGGREGATES WHERE APPROPRIATE;
(v) CONSIDERING FAVOURABLY PROPOSALS FOR THE WINNING AND WORKING OF MINERALS ( IN THE REGIONAL CONTEXT, WHILST) HAVING CLEAR REGARD TO (LOCAL FACTORS.) ENVIRONMENTAL IMPACT. (text in brackets deleted)
This will provide the necessary alignment with national policy and regional technical guidance. Paragraph 2.81 sets out the context of the above policy amendments.

12.12 Speaking at Public Examination

All of it. We are the voice of the UK minerals industry as our representations make clear.

Item Question Council Responses

13 13 Council Response

It is considered appropriate that the Policy reflects the need for an authority to note the landbank provision and limited resources within Newport to assist future judgements. The supporting text of Policy SP22 has been updated to reflect Newport’s position in terms of landbank provision, resource availability and the need to consider the wider regional context when considering applications.

The proposed rewording of the policy has not been taken forward into the plan. The suggested wording for criterion i) is considered inappropriate due to the fact that the protection of rail and wharves is set out in criterion ii). Also the policy clearly aims to provide an adequate level of provision by safeguarding potential supplies. The suggested changes to criterion iv) is also not considered appropriate as not all applications can be considered favourably from the outset. It is clear that such resources are finite and as such need to be protected but not to the expense of a thorough assessment.

A monitoring indicator will be added to the LDP to ensure that any further permissions are noted and considered. Amendments to the Regional situation will need to be adhered to. However, it would be premature to amend the wording of the Plan until the process has been finalised.

Mineral Products Association

Policy: M01

Summary: Policy is supported

Policy M1 Safeguarding of Mineral Resources

All Supported.
### Representation Details

- **Rep'n/Para/Policy**
- **Representor**
- **Agent**
- **Accession No**
- **Date Lodged**
- **Late?**
- **Source**
- **Type**
- **Mode**
- **Status**
- **Status Modified**

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**Document:** Revised LDP, p.115

**Policy:** M02

**Summary:** Support Policy M4

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**Item Question**

**Representation Text**

11

- **Policy M2 Mineral Development**
  - All supported.

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**Item Question**

**Council Responses**

13

- **Council Response**
  - Noted.

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**Item Question**

**Representation Text**

11

- **Policy M4 Wharves and Rail**
  - All supported.

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**Item Question**

**Council Responses**

13

- **Council Response**
  - Noted.
Document: Revised LDP, p.65
Policy: H01
Map: Proposals East: Proposals Plan - East
Summary: Request new site allocation at Oak Court for residential led mix used development.

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<td>10</td>
<td>Soundness Test</td>
<td>C1, C2, C4, CE1, CE2 &amp; CE4</td>
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On behalf of our client, Oak Court Estates, we formally request that the site detailed on the enclosed illustrative masterplan drawing (RFP ref. no. 1773/MP13) be considered for inclusion within the settlement boundary of Langstone and as a housing allocation (with on-site recreational and community amenities) under Policy H1 of the Revised Deposit LDP.

Site description

The site is located on the edge of the settlement of Langstone, close to the built-up area of eastern Newport. It is situated to the north of the A48, to the west of Halse Garden Centre and to the east of Catsash Road. A Roman road and farm buildings are situated to the north. There is a good road network in the vicinity of the site and it is well connected to the M4, however there are relatively few shops and facilities within Langstone itself. Whilst the site is Greenfield and is identified as countryside on the Revised Deposit LDP Proposals Map, there is continuous built-up development on three of the site’s boundaries, and it is therefore considered to represent an ‘infill’ site.

Background

The enclosed plan sets out the extent of our client’s land, which, together with land adjoining it to the north, was promoted for mixed-use/residential development during the preparation of the adopted UDP. This site was promoted as a potential mixed-use scheme consisting of housing with a new village centre (comprising retail units, health centre, primary school and amenity space). Whilst the Inspector noted the merits of the site and raised no objection to the scheme in planning terms, the site was not taken forward as an allocation at that time due to perceived impact on the deliverability of housing at the former Llanwern Steelworks site. Subsequent to this, the site boundary was revised and the southern part of our client’s site, as indicated on the enclosed plans, was put forward as a candidate site for mixed-use development (residential, employment, commercial) in this current emerging LDP. The reduced site was dismissed by the local planning authority (“LPA”) for inclusion within the LDP due to sustainability concerns over the release of Greenfield land for development and the risk of prejudicing the preferred strategy of focusing new housing on the redevelopment of Llanwern steel works and the Eastern Expansion Area. This view was taken in the context of a (erroneous) view that there is adequate housing supply in Newport. Further representations were submitted to the Deposit LDP in April 2012 to promote the site for a new village centre and residential development, which was also dismissed by the LPA. Our client has since formally submitted the proposals to the LPA for pre-application advice and subsequently met with them in September 2012 to discuss the proposals in more detail. In their formal pre-application advice, the LPA recognised that the proposed development is capable of delivering certain community benefits and that there may be justification for some form of development which provides a balance between community benefits and residential development. Our client considers that the site presents a significant opportunity to:

- Assist in meeting the overall housing requirement for Newport;
- Meet the pressing open market and affordable housing needs of Langstone, which could not be met by the allocation of major sites to the south of the M4 within the Newport conurbation;
- Ensure that Langstone fulfils its proper function as a village, through the provision of those facilities that its status in the settlement hierarchy demands; and
- Create local employment, through both the construction phase of the development and also in the longer term.

Accordingly, we are instructed to submit further representations to highlight the need for further reconsideration of the contribution that this site can make towards meeting the need for new housing and community/recreational facilities for Langstone.

Potential use

This site presents a unique opportunity to plan comprehensively for the current and future development needs of the local community. Langstone is a village with a substantial built-up area, which has high market demand for housing but is very limited in terms of community/recreational facilities. Housing in Langstone has been developed in a piecemeal manner and none of the developments have provided the necessary community facilities to support such housing growth. This has led to the unsustainable development of the village over recent years, which has had negative impacts on the local community and has led to unsustainable travel patterns. The development plan should identify the growing needs of the local community and provide for them accordingly. Indeed, that is the very reason for having the development plan. Failure to give due consideration to these needs will lead either to the facilities being provided on an ‘ad hoc’ basis, without regard to wider strategic and sustainability requirements, or not at all. The subject site represents a natural extension to the existing Settlement Boundary in Langstone, which follows the alignment of the A48 to the south and existing residential development to the east and west of the site. The inclusion of this site within the Settlement Boundary, as shown on the enclosed masterplan, would provide an infill development opportunity, linking the areas of existing residential development that flank the eastern and western boundaries of the subject site. Whilst the site is greenfield, it is not considered to be open countryside but, effectively an infill opportunity. It is bordered closely on three sides by urban development and amounts simply to an open space at the fringe of, but certainly within, a continuous urban settlement. The A48 is a busy main road and the character and environment of this stretch is dominated by that development. This has a noticeable bearing on the character of the subject site.
The development of the site would satisfactorily round—off the built—up area of Langstone and complete the existing pattern development between Catsash Road and the garden centre. It is envisaged that the proposed development would comprise two key elements—Community/ recreational facilities and enabling residential development.

Community/ recreational facilities

Langstone is notably deficient in facilities when compared to other villages within Newport County Borough. This is particularly evident in the Council’s Settlement Boundary Methodology Paper (April 2012), a background study to inform the LDP. The village of Underwood to the south east benefits from local stores, a health centre, playing fields and a leisure centre, whilst the villages of Marshfield and Castleton in the west of the county benefit from public houses, local shops, post office, a recreation ground, a garden centre, three areas of informal open space and a community centre. An extensive Council—led consultation with members of the local community to inform the LDP revealed their concerns over the lack of facilities for the village of Langstone. The need for new and improved community facilities for Langstone was also highlighted through recent and extensive consultations with the Community Council, undertaken by agents acting on behalf of the landowner. Paragraph 9.1 of the LDP Deposit notes that “A key challenge is to ensure that all parts of the community, including rural areas, have effective access to services and community facilities” yet no sites have been designated for such purpose in Langstone. The subject site represents a real opportunity to provide Langstone with community/ recreational facilities as part of a comprehensive mixed-use development. Policy SP12 of the Revised Deposit LDP encourages the development of new community facilities. At a national level, the importance of access to community facilities is noted in Planning Policy Wales (5th Edition, November 2012) and the provision of new facilities is also encouraged.

Housing

The site could also accommodate approximately 250 new dwellings of varying size and tenure (including affordable housing). Community consultation has highlighted a pressing local need for new housing, housing for the elderly and affordable housing. The proposed development would accommodate all three types of housing. The reluctance to allocate the subject site for housing to—date has in part been as a consequence of the, in our view incorrect, assumption that Newport is able to provide the 5 year supply of housing sites required by national guidance in PPW and TAN1. However, the Newport City Council LDP Housing Background Paper (April 2012) shows a five year supply by the residual method of only 3.5 years, some 30% below the requirement. The LPA has previously justified this under— provision by reference to application of past build rates. However, these past rates have been suppressed by infrastructural restraints on housing development such as the river defences and the clearance works to Llanwern. The effect is therefore to seriously underplay the future needs for housing and the economic benefits that new housing development can bring. Furthermore, the LPA’s assessment has been based on assumptions regarding the delivery of housing at its two principal allocations, at Llanwern and the EEA. Neither site has proceeded at the rates anticipated and therefore there is a short to medium term ‘gap’ in provision to which no proper consideration has been given. Since the publication of the Background Housing Paper and the Deposit LDP, the 2012 Joint Housing Land Availability Study (JHLAS) has been published (December 2012). The key finding of this study is that Newport now has a housing land supply of 7.0 years. This calculation is based on the past building rates methodology, which we consider can often play down demand quite significantly. The justification for this method is that at the time the JHLAS was undertaken in April 2012, there was no up— to—date development plan covering the Newport City Council area, otherwise TAN 1 advises that the residual method should normally be used. In terms of housing land supply, Table 1 of the JHLAS (large sites) identifies that out of a proposed 11,761 units, a total of 3,065 will be completed within 5 years. Table 2 calculates the contribution from small sites of less than 10 dwellings, based on the completions for the last five years, to be 192. Taken together, the overall 5 year land supply is therefore calculated to be 3,257 units. The 5 year land supply is predicated on housing numbers being delivered at a build rate of almost 40% above the average annual completion rate in Newport of 467 per annum. This is extremely optimistic, particularly when completion rates for the previous 3 years have been well below average. The 5 year land supply includes a figure of 2,511 units which fall within category 2 sites, where development cannot commence immediately but where the constraint on development is deemed likely to be removed in time for the dwellings to be completed within 5 years. Almost a third of these units are located at the Llanwern and Glen Llyn sites, which are forecast between them to deliver 827 units by 2017. The 5 year land supply is therefore very dependent on the delivery of large numbers at these sites, however an analysis of historic completion rates has revealed that actual completions have been far lower than projected numbers for several years. For example, the 2010 JHLAS forecast that 575 units would be completed at these sites by 2015, with the first 50 units completed by 2011, whilst the updated 2011 JHLAS forecast that 800 units would be completed by 2016, with the first 100 units completed in 2012. The more recent 2012 JHLAS revealed that only 10 units had actually been completed to date, with just 22 units under construction as at April 2012. Serious doubt is therefore cast as to the ability of these sites to achieve such ambitious numbers over the next 5 years, with serious implications for the supply of much— needed housing. The doubt concerning the delivery of housing numbers at the Glen Llyn site was also shared by the Planning Inspector in his consideration of a recent appeal against the refusal of a residential development proposal at Land South of Bethesda Close, Rogerstone (Appeal Ref: APP/G6935/A/11/2165600 — decision issued 17/07/12). The lack of a 5 year housing land supply in Newport was a major factor in the consideration of the appeal and was given considerable weight in the decision making process. The Inspector noted that the housing land supply was very much dependent on the deliverability of a large number of units at the Glen Llyn site, but evidence from the relevant developer cast doubt on the ability to achieve this due to infrastructure and site works requirements. The Inspector had no confidence that a 5 year land supply could be demonstrated in the 2012 JHLAS and determined that the appeal should be allowed. There has also been significant delay with the delivery of many other housing sites in Newport, such as Rodney Parade, Newport Athletic Club and Hurrians Garden Centre, with further implications for the supply of new homes. Longer term, over the plan period (2011—2026), the Revised Deposit LDP identifies a total housing supply of 11,622 units (including some 1,013 units from windfall sites) which it considers represents an oversupply of 12%. Notwithstanding our reservations with the calculation methodology adopted by Newport, and the apparent over— reliance on windfall sites which should be treated with caution, we consider that an oversupply of 12% is by no means a substantial buffer in any sense. Whilst the NPPF does not apply in Wales, it is noteworthy that it requires English LPAs to demonstrate a 5 year
land supply plus a 20% buffer where there has been a record of persistent under delivery of housing. In terms of a 12% buffer, as the LPA deem to be the case in Newport, it would only take a few key sites to stall and impact severely on supply. This is a major concern. The importance of a realistic housing land supply is also a major factor facing the neighbouring authority of Cardiff, where the Draft LDP had to be abandoned in 2010 and the process started all over again due to a major issue with housing land supply. Inspectors raised serious reservations about the target number of dwellings and the realism of whether the actual demand could genuinely be met on brownfield sites without the need for allocation of further Greenfield sites across the city. The economic downturn has led to fewer units being delivered on sites than the LPA expected which means that more land is needed to meet the target housing numbers and meeting this demand entirely on brownfield sites can no longer be supported. The problems being faced by Cardiff are indeed very similar to those in Newport. In terms of the delivery and availability of the subject site in Langstone, it is available for immediate development, has no constraints and is deliverable in the short term. It has the potential therefore to make a valuable contribution to the LDP’s Growth Strategy both in terms of meeting the 5 year land requirement and meeting the short term shortfall in available sites that has arisen as a consequence of the delay in the release of the larger sites at Llanwern and the EEA. Against this background and the local need for new housing and affordable housing, the proposed residential development of part of the subject site should be welcomed and the site allocated accordingly.

Highways and accessibility

Our client has instructed independent highways advice with regard to the proposed development, which has confirmed that the site is well located to minimise car use and to encourage use of sustainable modes of transport. Furthermore, it can be accommodated within the local highway network without issue and will also allow for improvements to access to the nearby Langstone Primary School.

Landscape

As the enclosed note from landscape consultants TAC P highlights, the indicative scheme has been designed to respect the local landscape characteristics. It falls outside the SLA and below the 50 metre contour line, allowing for it to be integrated visually and functionally with the remainder of Langstone.

Conclusions

The inclusion of the site within the settlement boundary and as a housing allocation in the LDP will deliver significant benefits in planning terms:
1. It will contribute towards meeting the shortfall in housing land supply in Newport;
2. It will contribute towards meeting the short/medium term requirement for new housing in the County Borough;
3. It will meet the pressing open market and affordable housing needs of Langstone village itself, which could not be addressed by allocation of major sites to the south of the M4 within the Newport conurbation;
4. It could enable the provision of much-needed community/recreational facilities for Langstone, creating a more sustainable and self-contained community, reducing the need to travel to locations further afield to access alternative facilities.
5. It will ensure that Langstone fulfils its proper function as a village, through the provision of those facilities that its status in the settlement hierarchy demands; and
6. It will create local employment, through both the construction phase of the development but also in the longer term. These benefits may be secured without harm to interests of acknowledged importance. We therefore request that this site is included within the settlement boundary of Langstone and allocated in the Newport LDP for new residential—led, mixed—use development.

12/02/2014
The representation notes that the proposed development site has no constraints. This is questioned by the Council who note in the assessment of the Alternative Site that the plan seeks to promote the reuse of Brownfield sites in preference to extensive use of Greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities.

The forecast housing need has been assessed in the context of population and employment projections and current market realities. The plan allocates sufficient land to meet this requirement. Additional housing allocations in a rural location cannot therefore be justified. Furthermore, the release of the representation site for housing would be contrary to the Council’s strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

It is recommended that this site is not included in the Local Development Plan for development purposes. It is also unclear as to how the proposal will minimise car use.

The Plan sets out the anticipated rate of delivery in Chapter 13 which illustrates that the total number of units is set to be delivered across the plan period. This in turn is established yearly through the Joint Housing Land Availability Study and monitored annually within the AMR. In particular the development rate anticipated over the plan period for the large housing development at Glan Llyn, is based on an annual review through the Joint Housing Land Availability Study (JHLAS) as required by National Planning Policy. Also noted within the representation were three sites which were considered to be under delivering. This is not accepted by the Council who set out the case for each site below:

1. Rodney Parade (City Vision & Former Robert Price Yard). Taylor Wimpey are on site and progressing with the former Robert Price element of the site nearing completion.
2. Newport Athletic Club. This site does not count towards the housing supply figure as the Council has no evidence to suggest the site would be delivered during the plan period.
3. Hurrans Garden Centre. This site has progressed and is nearing completion.

In addition to a perceived under supply within the Plan the representation also notes an over reliance on windfall sites. Planning Policy Wales notes that ‘flexibility will be needed in respect of the emergence of unidentified sites, i.e. sites not allocated in the LDP for the particular type of development and generally referred to as windfall sites, para 2.5.2.’ The rate of windfall sites is based on a review of the past trend of windfall supply which has been drastically cut to reflect the need for the Plan to remain flexible whilst concentrating growth on allocated housing sites and tight settlement boundaries. The plan will be monitored as to the percentage of houses developed on allocated housing sites to ensure that the housing policies of the plan are being effectively implemented.

The supply rates as set out in the Plan are considered appropriate and have been jointly agreed with the JHLAS study group which includes the development industry.

The effects of the economic recessions are still being felt within the housing market so it is therefore of no surprise that the plan anticipates a lower growth in the first period of the plan compared to the final ten years. The Plan does however provide enough land to ensure that a 5 year supply is met and that although the annual build rate is higher than currently achieved, even when taking into account the residual method of calculation, the Council has provided an adequate supply of land which has been agreed with the industry through the JHLAS process.

As the representation notes there is no set flexibility figure required for housing supply within development plans. However, during the examination of the Brecon Beacons National Park LDP WG noted a notional figure of 10% but that needed to reflect local circumstances. Other authorities within South East Wales have a range of 12-20% flexibility. It is good practice to allow for unknowns and the need for flexibility within a development plan is inherent from National Planning Policy. In Newport’s case the majority of the housing supply has planning permission or is being progressed. Those remaining 9 sites without planning permission are in line with the overall strategy or regeneration needs of the plan. Together they provide a 12% oversupply which is considered appropriate to enable to plan to cope with uncertainties that may arise over the plan period.

It is considered that the plan provides a more than adequate supply of housing which is both deliverable and viable. Many of the sites have progressed since the Revised Deposit Plan was written and there is a steady supply of housing being achieved across Newport.
Test of Soundness

Rationale:

C1 The allocation does not have regard to WG policy on the target for attaining favourable condition for SSSIs, because it would result in a deterioration of condition.

C3 The allocation does not have regard to the WSP, which sets out an environmentally sustainable vision for the Gwent Levels.

P2 The plan and its policies have not been subject to an adequate SA/SEA, because deficiencies in it have resulted in the site being proposed for allocation.

C2 In proposing to allocate the site, the local planning authority has not had regard to the Newport Coastal and Floodplain Grazing Marsh priority habitat, and thereby PPW (national planning policy).

C2 By proposing to allocate this site, the local planning authority has not had regard to national planning policy in relation to designated sites.

CE1 The local planning authority’s approach to the allocation of this site is not coherent, because the site’s development would be damaging and contrary to WG planning and wider public policy.

C2 In allocating this site, the local planning authority has not had regard to national planning policy (PPW) in terms of certainty.

C1 The allocation does not have regard to WG policy on the target for attaining favourable condition for SSSIs, because it would result in a deterioration of condition.

C2 The allocation does not have regard to WG planning policy on the protection and enhancement of SSSIs.

C3 The allocation does not have regard to the WSP, which sets out an environmentally sustainable vision for the Gwent Levels.

P2 The plan and its policies have not been subject to an adequate SA/SEA, because deficiencies in it have resulted in the site being proposed for allocation. Furthermore, the LPA has not had regard to the conclusions and recommendations of the SA/SEA with regard to the advisability of allocating this site, and has not clearly set out its reasons for not having regard to them.
Representation Details

Introduction:

The proposed allocation are located partly, or wholly within the Gwent Levels SSSI, which is a statutorily designated site of national importance for nature conservation, and part of a network of national sites.

1. Natural Resources Wales has identified the habitat type of the proposed allocation as Coastal and Floodplain Grazing Marsh. This is a UK and Welsh Biodiversity Priority Habitat type for which an action plan has been written. It has also been identified by the Welsh Government as a habitat of principal importance for the purpose of conserving biological diversity, pursuant of s42 of the NERC Act.

2. The proposed allocation would have significant and irreversible adverse impacts on the designated interest of the SSSI. These impacts will be both direct and indirect.

3. The proposed allocation would have significant and irreversible adverse impacts on the coastal grazing marsh habitat of acknowledged importance. These impacts will be direct and indirect, and will include the physical destruction of the habitat.

4. Welsh Government policy to prioritise brownfield development over greenfield development means that it would be developed after Newport's very large brownfield land resource.

5. To allocate this site would be contrary to the following:

   a. Section 28G of the NERC Act, which sets out the duties of the local planning authority, the Inspector, and the Welsh Government, with regard to the protection and enhancement of SSSIs.

   b. Section 42 of the NERC act, which sets out the Welsh Government, and the local planning authority, duties in respect of the UK BAP process with regards to the coastal grazing marsh habitat of acknowledged importance for biological diversity.

   c. Planning Policy Wales 2012, “LDP’s Wales 2005”, and TAN 5 (Nature Conservation) 2009, which sets out local planning authority and Welsh Government duties in respect of sustainable development, environmental protection and enhancement, statutorily designated sites of national nature conservation interest, the UK BAP and LBAP process, pollution, certainty and planning conditions and obligations.

   d. The Revised Deposit Draft Local Development Plan, in particular its approach to sustainable development, environmental protection and enhancement, statutorily designated sites of national nature conservation importance, the UK BAP and the LBAP process, replacement habitats, use of planning conditions and obligations, pollution and SEA/SA.

6. The Gwent Levels:**


The Gwent Levels SSSIs cover between them 5,700 ha of the Severn Estuary’s northern shoreline. These contiguous SSSIs represent the largest reclaimed lowland of National importance in Wales and are ranked amongst the 5 most important habitats of this type in the United Kingdom (The Gwent Levels, Their Importance for Nature Conservation, and Commitments for their Protection Martin Wragg, 1995). The statutorily designated conservation interest is to be found associated with the extensive network of reens and drainage ditches passing through the area. This drainage network supports 25 species of locally or Nationally scarce plants and 144 locally or Nationally scarce species of invertebrates. The wide variety of habitats within the Gwent Levels provides important feeding, roosting and breeding grounds for 8 species of wintering wader, as well as supporting populations of 13 species of mammals and herptofauna protected under the Wildlife and Countryside Act 1981. Reens and drainage ditches crossing these lowlands form fenceless field boundaries and many of these fields are categorised as coastal grazing marsh.
Likely Significant Adverse Impacts of the Proposed Allocation on the Biodiversity Value of the Site:

The likely significant adverse impacts arising as a result of the development of the site are both direct and indirect.

Direct:

• Physical destruction of the Coastal and Floodplain Grazing Marsh (UK, Welsh and Newport Priority Habitat) through built development. It would not be possible to mitigate for this adverse impact.

• Physical destruction of the reen SSSI notified interest through built development. It would not be possible to mitigate for this adverse impact.

Indirect:

Eutrophication: Landscaping would be required as part of the development. This would involve tree-planting. Leaf fall would cause eutrophication of the reens, (SSSI feature) which would significantly adversely impact on water quality. The flora and fauna of the reens rely on very high water quality, and are very sensitive to falls in quality. Please see assessments of a sample of post-construction monitoring studies carried out pursuant to planning conditions in respect of consented application for more information in respect of this matter. It would not be possible to enforce a planning condition in relation to this matter.

Chemical Pollution of Reen Interest: Hydrocarbon runoff from hard surfacing, and diffuse pollution from herbicides, pesticides and insecticides associated with maintenance of the prestige developments. It would not be possible to frame a planning condition or obligation, or enforce them, in relation to this matter, because inter alia it would not be possible to isolate individual sources of such pollution, or to stop them from entering the hydrological system, upon which the SSSI and Coastal and Floodplain Grazing Marsh interest depends.

Blocking of Management of Coastal and Floodplain Grazing Marsh (UK, Wales and Newport Priority Habitat) and Reens (SSSI): In the interests of health and safety, development would be likely to block access on the part of the machinery which is required to operate in or in close proximity to Coastal and Floodplain Grazing Marsh and reens.

Water Level Fluctuations: Fluctuations in water level during and following development can have profound effects on invertebrate populations. This is especially so when ditches are temporarily drained to allow construction, and as a result of rapid runoff from impervious surfaces such as car and lorry parks. As the site is located within the floodplain, and requires a Strategic Flood Consequences Assessment, drainage would be required to develop the site.

National and Local Policy Context:

Section 28G of the Wildlife and Countryside Act 1981, as amended by the Countryside and Rights of Way Act 2000

The Council has a duty in respect of Sites of Special Scientific Interest (SSSIs) under (hereafter referred to as the CROW Act). This duty affects the weight the Council should give to the conservation and enhancement of SSSIs in exercising its statutory planning functions, including the preparation of development plans and relevant proposals for land-use allocations.

The following are section 28G authorities:

(a) A Minister of the Crown (within the meaning of the Ministers of the Crown Act 1975) or a Government department;
(b) The Welsh Government (hereafter referred to as the WG), and therefore an Inspector appointed by the WG.
(c) A local authority;

Paragraph 45 of the Assembly’s Circular 31/2001 (Countryside and Rights of Way Act 2000) makes it clear that the section 28G duty applies whenever a local authority is exercising its functions.
“45. New section 28G, inserted in the 1981 Act, imposes an important new duty on public bodies, exercising statutory functions that may affect SSSIs, to take reasonable steps, consistent with the proper exercise of these functions, to further the conservation and enhancement of the features for which the site is of special interest. Public bodies specifically include local authorities and the duty applies wherever they are exercising their functions. The Welsh Government expects public bodies to apply strict tests when carrying out functions within or affecting SSSIs, to ensure that they minimise adverse effects, and to adopt the highest standards of management in relation to SSSIs that they own.” (emphasis added)

Para 5.4.3 of PPW states:

“This duty applies to the Welsh Ministers, Ministers of the Crown, local planning authorities, statutory undertakers and any other public body”

From this guidance, it is clear that in preparing its new LDP the local planning authority should have:

• "Taken all reasonable steps to ensure it conserved and enhanced all of the SSSIs within its area;
• In identifying potential land-use allocations, favouring those that would avoid adverse effects on SSSIs;
• Applied strict tests to any land-use allocations that could damage an SSSI to ensure that adverse effects could be mitigated in full in order to avoid such damage;

• If land-use allocations were to be pursued that were likely to cause damage to SSSIs (even with mitigation) that such damage could be fully justified i.e. it should clearly override the national importance of the SSSI and the Council had no less damaging alternative sites available to meet the identified need, and
• That appropriate habitat compensation could be provided for any likely damage to a SSSI likely to arise from such an allocation and that proper provision was made in the plan policy for such compensation to ensure that the interest of the SSSI network was conserved” (emphasis added)

It is the view of the RSPB that, by proposing this damaging allocation, the Council has not taken all reasonable steps to ensure it conserved and enhanced all of the SSSIs within its area. It has failed to apply strict tests to any landuse allocations that could damage a SSSI, and has failed to show that adverse effects cannot be adequately mitigated or compensated for. It has thus failed to set out how, in its view, the proposed allocation clearly override the national importance of the SSSI, failed to identify need, and failed to show conclusively that it had no less damaging alternative sites. It has furthermore failed to provide appropriate habitat compensation to ensure that the interest of the SSSI network was conserved.

The UK, Welsh and Newport Biodiversity Processes, and s42 and s41(3) of the Natural Environment and Rural Communities Act 2006

Over and above its designation of an SSSI, the site of the proposed allocation consists of Coastal and Floodplain Grazing Marsh, which is a Priority Habitat under the UK and Welsh Biodiversity processes for which a Habitat Action Plan (hereafter referred to as HAP) has been produced at the UK and Newport levels, and is in preparation at the Welsh level. Coastal and Floodplain Grazing Marsh is also placed on a list pursuant of section 42 of the NERC Act , as being considered by the Welsh Government as being of principal importance for the purpose of the conservation of biological diversity.

Paragraph 5.2.2 of PPW states that the NERC Act places a duty on local planning authorities (and the WG) to take (and to encourage others to take) reasonably practicable steps to further the conservation (including restoration and enhancement) of Priority Habitat types. The selection criteria for Priority Habitat types are that they must be habitats for which the UK has international obligations, habitats at risk, such as those with a high rate of decline, especially over the last 20 years or which are rare, habitats which may be functionally critical and habitats which are important for Priority Species

The RSPB is of the view that to reject this proposed allocation would be to take a reasonably practicable step to further the conservation of this habitat type, which is of acknowledged importance. This duty applies to the WG itself.
The Newport Coastal and Floodplain Grazing Marsh HAP cites eutrophication as a primary, widespread threat, and industrialisation and urbanisation as localised threats. The RSPB concurs with this, considers that the proposed allocation, would result in eutrophication. The RSPB concurs with the HAP that industrialisation and urbanisation, as exemplified by this proposed allocation, is a threat to Coastal and Floodplain Grazing Marsh.

The Newport Revised Deposit Draft LDP:

Policy CF13:

The text of Policy CF13 is deficient, because it does not provide certainty as to the location of a Welsh-medium primary school. Indeed, it appears from the text (para 9.56) that the local planning authority is itself uncertain as to where the school will be located. This is not in conformity with the need for the LDP to deliver certainty, as set out below. The RSPB is therefore of the view that CF13 (vii) should be deleted. If and when a new Welsh medium school is required, a site for it should be brought forward at the 5 yearly review stage of the LDP, and the need for it monitored as part of the AMR process.

Para 9.56 is deficient, because it does not identify that proposed allocation CF13 (vii) is located on a SSSI.

UK, Welsh and Newport Biodiversity Processes:

The RSPB objects to the lack of a LDP policy in relation to biodiversity, and the biodiversity processes. Please see separate representation form.

Planning Policy Wales 2012:

Sustainable Development and Planning Policy Wales 2012:

Paragraph 1.4.3 of Planning Policy Wales 2012 (hereafter referred to as PPW) states that the Welsh Government has a specific duty regarding sustainable development, namely that “it the (WG) promotes sustainable development”, via the s79 of the Government of Wales Act 2006.

Paragraph 1.4.3 further states that this duty has implications for the planning system.

It is the thus the view of the RSPB that the WG duty in relation to sustainable development set out in the Government of Wales Act must be addressed through inter alia the town and country planning system in Wales, and that to approve this proposed allocation which would have a material adverse impact on statutorily designated sites of national nature conservation importance a UK Biodiversity Priority Habitat would be counter to sustainable development, and thus to the Government of Wales Act 1998.

Paragraph 4.1.4. of PPW, in setting out how the Welsh Government promotes sustainable development, states that it is:-

“placing sustainability at the heart of its decision making processes” (Bullet Point1).

In respect of the Coastal and Floodplain Grazing Marsh Priority Habitat, para 5.4.2 of PPW states that the town and country planning system in Wales must :-
"forge and strengthen links between the town and country planning system and biodiversity action planning particularly through policies in local development plans"

It is the view of the RSPB that this emphasis on promoting sustainable development through decision-making means that the proposed allocation should be deleted from the LDP.

The Environmental Element of Sustainable Development

Paragraph 4.4.1 states that WG’s key policy objectives should be taken into account in the preparation of LDPs.

The WG’s principles in relation to sustainable development, as set out in paragraph 4.1.2 of PPW, elucidates the environmental element of sustainable development, through stating in Bullet Point 4 that environmental limits will be respected. The RSPB considers that were this allocation to be permitted, environmental limits would not be respected.

Paragraph 4.4.2 (Bullet Point 7) cites planning as a key policy tool contributing to the protection and improvement of the environment so as to protect local and global ecosystems. In particular planning should “seek to ensure that development does not produce irreversible harmful effects on the natural environment”. Bullet Point 7 further cites as an objective the conservation and enhancement of statutorily designated sites and the conservation of biodiversity.

Chapter 5 of PPW contains the WG’s planning policy relating to conserving and improving natural heritage.

Statutorily Designated Sites:

Paragraph 5.1.2 (Bullet Point 3) states the WG’s objectives in relation to this matter include ensuring that statutorily designated sites are properly protected. It is the RSPB’s view that the Gwent Levels, as a statutorily designated site should be protected from damaging development.

Paragraph 5.3.2 states that regard should be had to the relative significance of international, national, and local designations when considering the weight to be attached to nature conservation interests. As the Gwent Levels SSSI is designated at the national level and therefore towards the top of the hierarchy, the RSPB is of the view that significant weight should be attached to this proposed allocation, which would have a significant adverse impact upon them.

Paragraph 5.3.1 states that statutorily designated sites make a vital contribution to protecting biodiversity. The RSPB concurs with this.

Paragraph 5.3.9 of PPW states that the WG will ensure that statutorily designated sites (of which the Gwent Levels SSSI is one) are protected against damage and deterioration (consistent with the objectives of the designation). The RSPB considers that to permit this proposed allocation would be to fail to comply with this requirement.

Para 5.2 of PPW further states that:-

"local planning authorities should further the conservation of habitats of principal importance through their planning function"

This strengthens the materiality of the need to protect this habitat via the LDP

A further principle, as set out in Bullet Point 8 of para 4.3.1, states that pollution should be prevented as far as possible and that the polluter pays for damage resulting from pollution. The RSPB considers that eutrophication of the SSSI reen interest which is likely to occur as a result of the development of their proposed allocation is a form of pollution.

Supplementary Planning Guidance “Wildlife and Development” 2010:
**Section 3, Bullet Point 4 (page 6) of the Supplementary Planning Guidance "Wildlife and Development" 2010 states:**

“The Council has an obligation to protect (legally protected sites) as part of the planning process.”

The RSPB considers that to delete this site would be in conformity with his obligation.

**Table 1 (page 8) of the SPG states that, in relating to nationally important designated sites, there is a:**

“Strong presumption against damaging development”

As the RSPB considers that the development of this site would be damaging, the Council would, if it wishes to allocate the site, have to surmount this strong presumption. The RSPB considers that it has failed to do so.

**The Brownfield Test:**

Para 4.8.1 of PPW states:

“Previously developed (or brownfield) land should, wherever possible, be used in preference to greenfield sites, particularly those of high ecological value”

The SSSI designation, and UK, Wales and Newport Biodiversity Priority Habitat classification of the Gwent Levels shows that they are of high ecological value, and the fact that there is no need for the proposed allocation shows that it is possible to use brownfield land in preference.

Policy SP1 of the Revised Deposit Draft LDP (criterion (ii) states:

PROPOSALS WILL BE REQUIRED TO MAKE A POSITIVE CONTRIBUTION TO SUSTAINABLE DEVELOPMENT BY CONCENTRATING DEVELOPMENT IN SUSTAINABLE LOCATIONS ON BROWNFIELD LAND WITHIN THE SETTLEMENT BOUNDARY. THEY WILL BE ASSESSED AS TO THEIR POTENTIAL CONTRIBUTION TO:

i) THE EFFICIENT USE OF LAND;
ii) THE REUSE OF PREVIOUSLY DEVELOPED LAND AND EMPTY PROPERTIES IN PREFERENCE TO GREENFIELD SITES;

The RSPB supports this policy, and furthermore believes that with the largest brownfield resource in Wales, it is possible to act in conformity with it, by not allocating CF13 (vii)

**Paragraph 1.21 of "LDP’s Wales 2006” states:**

“it is important that proposals are... likely to be implemented during the plan period”.

**Certainty and Deliverability:**

PPW paragraph 2.1.7 states:

“LDPs should give developers and the public certainty about the type of development that will be permitted at a given location” (emphasis added)

This means that proposals are realistic and likely to be implemented during the plan period.
Para 9.56 (p113) states:-

"the exact location of the facility will be determined as part of an educational provision review"

It is thus clear that certainty cannot be delivered via the RLDP, and we thus consider that this site should not be allocated

Conclusion:

In conclusion, the RSPB is firmly of the view that to permit this proposed allocation, which would have significant adverse effects on a statutorily designated site of national nature conservation interest and on a threatened habitat of acknowledged importance, would be contrary to national and local planning policy and good practice, and to UK and Welsh legislation relating to the Welsh Government’s duties in relation to sustainable development, the protection of the environment, protection and enhancement of SSSI’s and the protection of UK, Welsh and Newport BAP and s42 priority habitats.

It would further be in conflict with established and widely recognised good planning practice in terms of environmental assessment, the resourceful use of land, and the use of supplementary planning guidance.

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I wish to speak because this matter raises issues which go to the heart of the plan and make it unsound.

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<th>Council Responses</th>
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<td>2</td>
<td>Soundness of LDP</td>
<td>No</td>
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Council Response

The site South of Percoed Reen (CF13 (vii)) is required for additional and enhanced school facilities to meet future educational needs.

Any development of the site south of Percoed Reen for education purposes would require specific ecological surveys and any negative effects would need to be avoided, mitigated and compensated. This is because the site is located in the Gwent Levels, St Brides SSSI.

Developers will be required to consider whether they need to undertake an Environmental Impact Assessment in line with The Town and Country Planning (EIA England and Wales) Regulations 1999.

Under the Habitats Regulations a developer will also be required to carry out a Habitat Regulation Assessment to determine whether the proposal is likely to have significant effects on any of the internationally designated sites found within Newport and within a 15km radius. If this is found to be the case then the developer will be required to submit a statement to inform an appropriate assessment which will be undertaken by the competent authority.

If it is found that the development would lead to adverse effects on biodiversity then the development will not be permitted.

Within the Gwent Levels SSSI, a developer will be required to adhere to the following legislation:
1. The Conservation of Habitats and Species Regulations 2010 (The Habitat Regulations) which implements the EC Birds Directive 2009/147
2. The Wildlife and Countryside Act 1981 (as amended) which implements the EC Birds Directive 2009/147
3. The Natural Environment and Rural Communities Act (2006)
5. The Protection of Badgers Act 1992
6. The Hedgerow Regulations 1997

A developer will also be required to adhere to the following policies, plans and guidance:
2. Convention on Biological Convention
3. Other policies contained within the LDP
4. Newport Local Biodiversity Action Plan (LBAP)
6. Planning Policy Wales PPW 2010
9. NCC Wildlife and Development SPG
**Representation Details**

by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M

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Document: Revised LDP, p.79
Policy: EM01.01
Summary: Delete EM1 (i) Duffryn employment site.

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- **C1** The allocation does not have regard to WG policy on the target for attaining favourable condition for SSSIs, because it would result in a deterioration of condition.
- **C2** The allocation does not have regard to WG planning policy on the protection and enhancement of SSSIs.
- **P2** The plan and its policies have not been subject to an adequate SA/SEA, because deficiencies in it have resulted in the site being proposed for allocation. Furthermore, the LPA has not had regard to the conclusions and recommendations of the SA/SEA with regard to the advisability of allocating this site, and has not clearly set out its reasons for not having regard to them.
- **C2** In proposing to allocate the site, the local planning authority has not had regard to the NERC Act with regard to the Newport Coastal and Floodplain Grazing Marsh priority habitat, and thereby PPW (national planning policy)
- **C2** By proposing to allocate this site, the local planning authority has not had regard to national planning policy in relation to designated sites
- **CE1** The local planning authority’s approach to the allocation of this site is not coherent, because the site is not needed, and its development would be damaging and contrary to WG planning and wider public policy.
- **C2** In allocating this site, the local planning authority has not had regard to national planning policy (PPW) in terms of certainty
The RSPB objects to that part of the proposed allocation EM1 (i) (Duffryn), which lies within the Gwent Levels SSSI, for the following planning reasons:

1. The proposed allocation is located partly within the Gwent Levels SSSI, which is a statutorily designated site of national importance for nature conservation, and part of a network of national sites.

2. CCW has identified the habitat type of the proposed allocation as Coastal and Floodplain Grazing Marsh. This is a UK and Welsh Biodiversity Priority Habitat type for which an action plan has been written. It has also been identified by the Welsh Government as a habitat of principal importance for the purpose of conserving biological diversity, pursuant of s42 of the NERC Act.

3. The proposed allocation would have significant and irreversible adverse impacts on the designated interest of the SSSI. These impacts would be both direct and indirect.

4. The proposed allocation would have significant and irreversible adverse impacts on the coastal grazing marsh habitat of acknowledged importance. These impacts will be direct and indirect, and will include the physical destruction of the habitat.

5. The local planning authority's claim that the above impacts can be satisfactorily mitigated through the use of planning conditions and planning obligations is not correct. Case studies in relation to development on the Gwent Levels shows that this approach has failed in the past because there are a number of indirect and direct adverse impacts which cannot be obviated or “designed away”, and/or cannot be enforced, were conditions imposed or obligations signed. National planning guidance states that compensation is a last resort, and as the proposed allocation is not needed (see below) the site should not be developed.

6. There is no need for the proposed allocation. The LDP’s employment land provision target can be attained without it, because it constitutes a very significant over-allocation.

7. Welsh Government policy to prioritise brownfield development over greenfield development means that it would be developed only after Newport’s very large brownfield land resource. Notwithstanding the question referred to above, this would be several decades after the end of the plan period, which frustrates WG policy on the certainty and deliverability of LDPs.

8. To allocate this site would be contrary to the following:

f. Section 28G of the NERC Act, which sets out the duties of the local planning authority, the Inspector, and the Welsh Government, with regard to the protection and enhancement of SSSIs.

g. Section 42 of the NERC Act, which sets out the Welsh Government, and the local planning authority duties in respect of the UK BAP process with regard to the coastal grazing marsh habitat of acknowledged importance for biological diversity.

h. Planning Policy Wales 2012, ‘LDP’s Wales’ 2005, and TAN 5 (‘Nature Conservation and Planning’) 2009, which sets out local planning authority and Welsh Government duties in respect of sustainable development, environmental protection and enhancement, statutorily designated sites of national nature conservation interest, the UK BAP and LBAP process, pollution, certainty and planning conditions and obligations.

i. The Deposit Draft Local Development Plan itself, in particular its approach to sustainable development, environmental protection and enhancement, statutorily designated sites of national nature conservation importance, the UK, Wales and Newport biodiversity processes, replacement habitats, use of planning conditions and obligations, employment, pollution and SEA/SA, brownfield land and certainty.

j. The sustainability appraisal of the development plan and the strategic environmental assessment of the development plan.

It is instructive to note that the Inspector into the 2006 Newport UDP Public Inquiry, concluded, in relation to the same site, as follows:

Bearing in mind the requirement set out Section 28G in the Countryside and Rights of Way Act 2000 for the Council to take reasonable steps, consistent with the proper exercise of its functions to further the conservation and enhancement of the flora and fauna of this Site of Special Scientific Interest I would expect such a site to be allocated for development only if there was a need to do so. The Council has not demonstrated such a need. I agree, therefore with the
amendment proposed by the Council which would emphasise the significance of the Site of Special Scientific Interest.

Some added weight is given to this conclusion by the fact that the site is also floodplain and coastal grazing marsh, a priority habitat capable of supporting priority species. Section 74 of the Countryside and Rights of Way Act 2000 places a duty on public bodies in carrying out their functions to have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.

Duffryn
To my mind the same arguments apply to the proposed allocation of 22ha of employment land at Duffryn (Policy ED1(i), land that is within the St Brides Site of Special Scientific Interest.

The local planning authority has not provided any new evidence since 2006 to show a need for the site, nor carried out any research into the economic criteria which would be used to decide upon whether an application is of UK-national importance or not. This latter point is referred to in para 10.82 of the previous SA/SEA Report. SEA

In respect of the amendment referred to by the Inspector, which the RSPB agreed with the Council, the absence of development proposals in respect of the site since 2006 shows that a new approach is now needed. The RSPB considers that the proposed allocation should be deleted, and that, if a developer wishes apply for consent for a development in this location, it should be dealt with through via the departure procedures outlined in para 3.12.1 et seq of PPW, and Welsh Office Circular 39/92.

The advantages of this approach are that it reduces uncertainty with regard to the environmentally sustainable management of the site, to further it’s condition, as required by the Welsh Government target on SSSI condition. Please see below for more information in relation to this matter.

It is further instructive to note that para 10.82 of the previous SA/SEA Report (page 274) states that the previous iteration of the SA recommended that EM1 (i) not be carried forward for development.

**Background:**

The Gwent Levels:

The proposed allocation objected to by the RSPB fall partly within the Gwent Levels Sites of Special Scientific Interest, notified under S28 of the Wildlife and Countryside Act 1981 (as amended). The Gwent Levels SSSI comprises 6 component SSSIs, with allocation EM1(i) (Duffryn), falling partly within the St Brides SSSI,

The Gwent Levels SSSIs cover between them 5,700 ha of the Severn Estuary’s northern shoreline. These contiguous SSSIs represent the largest reclaimed lowland of National importance in Wales and are ranked amongst the 5 most important habitats of this type in the United Kingdom (The Gwent Levels, Their Importance for Nature Conservation, and Commitments for their Protection Martin Wragg, 1995). The statutorily designated conservation interest is to be found associated with the extensive network of reens and drainage ditches passing through the area. This drainage network supports 25 species of locally or Nationally scarce plants and 144 locally or Nationally scarce species of invertebrates. The wide variety of habitats within the Gwent Levels provides important feeding, roosting and breeding grounds for 8 species of wintering wader, as well as supporting populations of 13 species of mammals and herptofauna protected under the Wildlife and Countryside Act 1981. Reens and drainage ditches crossing these lowlands form fenceless field boundaries and many of these fields are categorised as coastal grazing marsh.

**Likely Significant Adverse Impacts of the Proposed Allocation on the Biodiversity Value of the Site:**

**Direct:**

- Physical destruction of the Coastal and Floodplain Grazing Marsh (UK, Welsh and Newport Priority Habitat) through built development. It would not be possible to mitigate for this adverse impact
- Physical destruction of the reen SSSI notified interest through built development. It would not be possible to mitigate for this adverse impact.
Indirect:

Eutrophication: Landscaping would be required as part of the development envisaged in the LDP, and this would involve tree-planting. Leaf fall would cause eutrophication of the reens, (SSSI feature) which would significantly adversely impact on water quality. The flora and fauna of the reens rely on very high water quality, and are very sensitive to falls in quality. Please see assessments of a sample of post-construction monitoring studies carried out pursuant to planning conditions in respect of consented application for more information in respect of this matter. It would not be possible to enforce a planning condition in relation to this matter.

Chemical Pollution of Reen Interest: Hydrocarbon runoff from hard surfacing, and diffuse pollution from herbicides, pesticides and insecticides associated with maintenance of the prestige developments. It would not be possible to frame a planning condition or obligation, or enforce them in relation to this matter, because inter alia it would not be possible to isolate individual sources of such pollution, or to stop them from entering the hydrological system upon which the SSSI and Coastal and Floodplain Grazing Marsh interest depends.

Blocking of Management of Coastal and Floodplain Grazing Marsh (UK, Wales and Newport Priority Habitat) and Reens (SSSI): Development would be likely to block access on the part of the machinery which is required to operate in or in close proximity to Coastal and Floodplain Grazing Marsh and reens.

Water Level Fluctuations: Fluctuations in water level during and following development can have profound effects on invertebrate populations. This is especially so when ditches are temporarily drained to allow construction, and as a result of rapid runoff from impervious surfaces. As the site is located within the floodplain, and requires a Strategic Flood Consequences Assessment, drainage would be required to develop the site.

National and Local Policy Context:

Section 28G of the Wildlife and Countryside Act 1981, as amended by the Countryside and Rights of Way Act 2000

The Council has a duty in respect of Sites of Special Scientific Interest (SSSIs) under (hereafter referred to as the CROW Act). This duty affects the weight the Council should give to the conservation and enhancement of SSSIs in exercising its statutory planning functions, including the preparation of development plans and relevant proposals for land-use allocations.

The following are section 28G authorities:

(a) A Minister of the Crown (within the meaning of the Ministers of the Crown Act 1975) or a Government department;
(b) The Welsh Government (hereafter referred to as the WG) and an Inspector appointed by the WG
(c) A local authority.

Paragraph 45 of the Assembly’s Circular 31/2001 (Countryside and Rights of Way Act 2000) makes it clear that the section 28G duty applies whenever a local authority is exercising its functions.

"45 New section 28G, inserted in the 1981 Act, imposes an important new duty on public bodies, exercising statutory functions that may affect SSSIs, to take reasonable steps, consistent with the proper exercise of these functions, to further the conservation and enhancement of the features for which the site is of special interest. Public bodies specifically include local authorities and the duty applies wherever they are exercising their functions. The Welsh Government expects public bodies to apply strict tests when carrying out functions within or affecting SSSIs, to ensure that they minimise adverse effects, and to adopt the highest standards of management in relation to SSSIs that they own." (emphasis added)

Para 5.4.3 of PPW states :-

“This duty applies to the Welsh Ministers, Ministers of the Crown, local planning authorities, statutory undertakers and any other public body”

From this guidance, it is clear that in preparing its new LDP the local planning authority should have:
**Taken all reasonable steps to ensure it conserved and enhanced all of the SSSIs within its area;**

- In identifying potential land-use allocations, favouring those that would avoid adverse effects on SSSIs;

- Applied strict tests to any land-use allocations that could damage an SSSI to ensure that adverse effects could be mitigated in full in order to avoid such damage;

- If land-use allocations were to be pursued that were likely to cause damage to SSSIs (even with mitigation) that such damage could be fully justified i.e. it should clearly override the national importance of the SSSI and the Council had no less damaging alternative sites available to meet the identified need, and

- That appropriate habitat compensation could be provided for any likely damage to a SSSI likely to arise from such an allocation and that proper provision was made in the plan policy for such compensation to ensure that the interest of the SSSI network was conserved”.

(emphasis added)

It is the view of the RSPB that, by proposing this damaging allocation, the Council has not taken all reasonable steps to ensure it conserved and enhanced all of the SSSIs within its area. By for example over-allocating employment land beyond that required to attain the Council’s employment land provision targets (see below for more detail on this matter), it has failed to exclude potential allocations that would have adverse effects on SSSIs. It has failed to apply strict tests to any landuse allocations that could damage a SSSI, and has failed to show that adverse effects cannot be adequately mitigated or compensated for. It has thus failed to set out how, in its view, the proposed allocation clearly overrides the national importance of the SSSI (merely stating that they would be “prestige”, CHECK REF TO PRESTIGE IN TEXT and not providing any economic tests which would be used to decide whether or not an application is of UK-national importance), failed to identify need, and failed to show conclusively that it had no less damaging alternative sites.

The UK, Welsh and Newport Biodiversity Processes, and s42 and s41(3) of the Natural Environment and Rural Communities Act 2006:

Over and above its designation as an SSSI, the site of the proposed allocation consists of Coastal and Floodplain Grazing Marsh, which is a Priority Habitat under the UK and Welsh Biodiversity processes for which a Habitat Action Plan has been produced at the UK and Newport levels, and is in preparation at the Welsh level. Coastal and Floodplain Grazing Marsh is also placed on a list pursuant of section 42 of the NERC Act, as being considered by the Welsh Government as being of principal importance for the purpose of the conservation of biological diversity.

Paragraph 5.2.2 of PPW states that the NERC Act places a duty on local planning authorities (and the WG) to take (and to encourage others to take) reasonably practicable steps to further the conservation (including restoration and enhancement) of Priority Habitat types. The selection criteria for Priority Habitat types are that they must be habitats for which the UK has international obligations, habitats at risk, such as those with a high rate of decline, especially over the last 20 years or which are rare, habitats which may be functionally critical and habitats which are important for Priority Species

The RSPB is of the view that to reject this proposed allocation would be to take a reasonably practicable step to further the conservation of this habitat type, which is of acknowledged importance. This duty also applies to the WG itself.

The Newport Coastal and Floodplain Grazing Marsh HAP cites eutrophication as a primary, widespread threat, and industrialisation and urbanisation as localised threats. The RSPB concurs with this, and considers that the proposed allocation would result in eutrophication. The RSPB concurs with the HAP that industrialisation and urbanisation, as exemplified by this proposed allocation is a threat to Coastal and Floodplain Grazing Marsh.

The Newport Revised Deposit Draft LDP:

Para 2.4.1 of PPW states :-
"National planning policies in Planning Policy Wales should not be repeated"

As the protection of nationally important statutorily designated sites for nature conservation is national policy, it is not addressed in the Newport Deposit Draft LDP, therefore please see below for a discussion of this issue.

UK, Welsh and Newport Biodiversity Processes:

The RSPB objects to the lack of a plan policy in relation to biodiversity, and the biodiversity processes. Please see separate representation form.

Planning Policy Wales 2012

Sustainable Development and Planning Policy Wales 2012

Paragraph 1.4.3 of Planning Policy Wales 2012 states that the Welsh Government has a specific duty regarding sustainable development, namely that “it the (WG) promotes sustainable development” via the s79 of the Government of Wales Act 2006.

Paragraph 1.4.3 further states that this duty has implications for the planning system.

It is the thus the view of the RSPB that the WG duty in relation to sustainable development set out in the Government of Wales Act must be addressed through inter alia the town and country planning system in Wales, and that to approve this proposed allocation which would have a material adverse impact on statutorily designated sites of national nature conservation importance a UK Biodiversity Priority Habitat would be counter to sustainable development, and thus to the Government of Wales Act.

Paragraph 4.1.4. of PPW, in setting out how the Welsh Government promotes sustainable development, states that it is:-

“placing sustainability at the heart of its decision making processes” (Bullet Point1).

In respect of the Coastal and Floodplain Grazing Marsh Priority Habitat, para 5.4.2 of PPW states that the town and country planning system in Wales must :-

“forge and strengthen links between the town and country planning system and biodiversity action planning particularly through policies in local development plans”

It is the view of the RSPB that this emphasis on promoting sustainable development through decision-making means that the proposed allocation should be deleted from the LDP.

The Environmental Element of Sustainable Development

Paragraph 4.4.1 states that WG’s key policy objectives should be taken into account in the preparation of LDPs.

The WG’s principles in relation to sustainable development, as set out in paragraph 4.1.2 of PPW, elucidate the environmental element of sustainable development, through stating in Bullet Point 4 that environmental limits will be respected. The RSPB considers that were this allocation to be permitted, environmental limits would not be respected.

Paragraph 4.4.2 (Bullet Point 7) cites planning as a key policy tool contributing to the protection and improvement of the environment so as to protect local and global ecosystems. In particular planning should “seek to ensure that development does not produce irreversible harmful effects on the natural environment”. Bullet Point 7 further cites as an objective the conservation and enhancement of statutorily designated sites and the conservation of biodiversity.

Chapter 5 of PPW contains the WG’s planning policy relating to conserving and improving natural heritage.
Statutorily Designated Sites:

Paragraph 5.1.2 (Bullet Point3) states the WG’s objectives in relation to this matter include ensuring that statutorily designated sites are properly protected. It is the RSPB’s view that the Gwent Levels, as a statutorily designated site should be protected from damaging development.

Paragraph 5.3.2 states that regard should be had to the relative significance of international, national, and local designations when considering the weight to be attached to nature conservation interests. As the Gwent Levels SSSI is designated at the national level and therefore towards the top of the hierarchy, the RSPB is of the view that significant weight should be attached to this proposed allocation, which would have a material adverse impact upon them.

Paragraph 5.3.1 states that statutorily designated sites make a vital contribution to protecting biodiversity. The RSPB concurs with this.

Paragraph 5.3.9 states that the WG will ensure that statutorily designated sites (of which the Gwent Levels SSSI is one) are protected against damage and deterioration (consistent with the objectives of the designation). The RSPB considers that to permit this proposed allocation would be to fail to comply with this requirement.

Para 5.2 of PPW further states that:-

“local planning authorities should further the conservation of habitats of principal importance through their planning function”

This strengthens the materiality of the need to protect this habitat via the LDP

A further principle, as set out in Bullet Point 8 of para 4.3.1. states that pollution should be prevented as far as possible and that the polluter pays for damage resulting from pollution. The RSPB considers that eutrophication of the SSSI reen interest which is likely to occur as a result of the development of their proposed allocation is a form of pollution.

The main method the Council employs in attempting to surmount the environmental impacts arising from this proposed allocation is to cite the use of mitigation and compensation as legitimate means of overcoming such problems, and the use of planning conditions and obligations as a means of delivering mitigation and compensation.

Paragraph 3.7.1 (Planning Obligations) of PPW refers to the need to offset negative consequences of development. Again, this is not possible in respect of proposed allocation EM1 (i)

Mitigation:

Annex A2 of SPG “Wildlife and Development” 2010 states :-

Applicants should ensure that they take account of all the potential effects of a development and make sure that avoidance and mitigation are appropriate to the situation”

In outlining the nature and severity of likely adverse impacts arising from the proposed allocation, the RSPB has shown that successful avoidance and mitigation are not possible and therefore not appropriate.

Use of Planning Conditions and Planning Obligations:

PPW (paragraph 4.6.1) states that conditions can enable a development proposed to proceed where it would otherwise be necessary to refuse planning permission. The RSPB is of the view that in the case of this proposed allocation, the imposition of conditions cannot fulfil this role, because they cannot change the nature of the development to the extent where it would not otherwise be necessary to refuse permission.
Paragraph 3.6.2 of PPW sets out in bullet point form the criteria which should be used in deciding when a condition should be imposed. Bullet Point 4 states that conditions should be enforceable. The RSPB considers that such conditions cannot be enforced and therefore cannot be imposed.

Past Use of Planning Conditions in Respect of Planning Applications on the Gwent Levels:

The RSPB’s view that the use of planning conditions and obligations cannot remove adverse impacts on the SSSI interest is supported by a 2005 desk study, carried out by the Gwent Wildlife Trust, which examined the efficacy of conditions imposed in respect of some major planning applications on the Gwent Levels in Newport, looking at the results of post-construction monitoring.

Construction of Distribution Depot, Associated Trailer Parks and Car Parking, etc. Approved 6th August 1993

CCW did not recommend to the then Welsh Office that the call in the application be called-in, due to a commitment on the part of the developer to the highest environmental standards being conditioned on the application by the Newport County borough Council.

Post-construction monitoring in respect of this application showed that, in spite of the imposition of conditions:

- All surveys conducted indicate a substantial impact on the reens as a result of the development.
- The ecosystems affected displayed different rates of recovery, or no recovery at all.
- The aquatic invertebrate communities identified in the baseline survey have shown a continued decline throughout the survey period.
- These losses in abundance and diversity were a result of the construction works.

Erection of 76,000 sq m Distribution Centre with Parking, Loading, Offices, etc. Approved 26th August 1999:

Post-construction monitoring showed that, in spite of the imposition of conditions:

- High sulphate levels resulted in white and red algal blooms, and sulphur bacteria blooms in the reens on site, which in turn led to a reduction in the abundance and diversity of important invertebrate and plant species.
- High levels of other pollutants and poor water quality were recorded throughout the monitoring period.
- Sulphate levels in the balancing pond have stabilised at around 241 mg/l, far in excess of the 200 mg/l level deemed serious by CCW.
- pH levels remained consistently high and in excess of acceptable levels.
- Since development ceased floral diversity improved marginally in some reens, while in others it decreased further.
- Very few rare or notable plant species have been recorded since development began.
- Only 2 notable aquatic/semi aquatic invertebrate species were found on site at the end of the monitoring period. Amongst the semi aquatic invertebrates there has been a substantial decrease in diversity.

Supplementary Planning Guidance “Wildlife and Development” 2010:

Section 3, Bullet Point 4 (page 6) of the Supplementary Planning Guidance “Wildlife and Development” 2010 states:

“The Council has an obligation to protect (legally protected sites) as part of the planning process”

The RSPB considers that to delete this proposed allocation would be in conformity with his obligation.
Table 1 (page 8) of the SPG states that, in relating to nationally important designated sites, there is a “Strong presumption against damaging development”

As the RSPB considers that the development of this site would be damaging, the Council would, if it wishes to allocate the site, have to surmount this strong presumption. The RSPB considers that it has failed to do so.

- The requirement for the carrying out of a Sustainability Appraisal and a Strategic Environmental Assessment of the development plan.
- TAN 5 2009
- The UKBAP process

Need:

Given the fact that the RLDP proposes to allocate more than 7 times that required using the trend-based approach, EM1 (i) could be deleted from the LDP without having any impact whatsoever on its ability to attain its employment provision target. The allocation of EM1 is thus a very substantial over-allocation of some 320 hectares which would, at present take up rates of 11.4 hectares per year (described at paragraph 2.70 of the LDP as “appropriate”) would take approximately 28 years to complete. Even this is an underestimate, given that an element of the additional approximately 469 hectares allocated in policy EM2 (Regeneration Sites) would also be employment land development. This is acknowledged in line 1 of policy EM1.

In the light of the significant adverse impact on the UK-nationally important Gwent Levels SSSI and the UK, Wales and Newport Biodiversity process Priority Habitat Coastal and Floodplain Grazing Marsh set out elsewhere in this representation which would be likely to arise as a result of the allocation of this site, the fact that it is not required adds weight to the RSPB’s view that it should not be allocated.

The Brownfield Test:

Para 4.8.1 of PPW states: -

"Previously developed (or brownfield) land should, wherever possible, be used in preference to greenfield sites, particularly those of high ecological value"

The SSSI designation, and UK, Wales and Newport Biodiversity Priority Habitat classification of the Gwent Levels shows that they are of high ecological value, and the fact that there is no need for the proposed allocation shows that it is possible to use brownfield land in preference.

Policy SP1 of the Revised Deposit Draft LDP (criterion (ii) states: -

PROPOSALS WILL BE REQUIRED TO MAKE A POSITIVE CONTRIBUTION TO SUSTAINABLE DEVELOPMENT BY CONCENTRATING DEVELOPMENT IN SUSTAINABLE LOCATIONS ON BROWNFIELD LAND WITHIN THE SETTLEMENT BOUNDARY. THEY WILL BE ASSESSED AS TO THEIR POTENTIAL CONTRIBUTION TO:

1) THE EFFICIENT USE OF LAND;
2) THE REUSE OF PREVIOUSLY DEVELOPED LAND AND EMPTY PROPERTIES IN PREFERENCE TO GREENFIELD SITES;
The RSPB supports this policy, and furthermore believes that with the largest brownfield resource in Wales, it is possible to act in conformity with it.

As stated above, decades would elapse after the end of the plan period before EM1(i) would be developed. Paragraph 1.21 of "LDP’s Wales 2006" states:

"it is important that proposals are... likely to be implemented during the plan period".

The RSPB considers that, given that there is no need for EM1 (i), and that pursuit of para 4.8.1 would result in it being developed last, this proposed allocation is not in conformity with PPW and LDPs Wales.

This view is given added weight by the fact that the site has been allocated in previous development plans for many years without being developed, even during periods of rapid economic growth in Newport. Given that Wales is suffering its worst economic downturn for several decades, even disregarding the insurmountable environmental constraints associated with the site, the RSPB considers that it is extremely unlikely to be required during the plan period.

Certainty and Deliverability:

PPW paragraph 2.1.7 states:

“LDPs should give developers and the public certainty about the type of development that will be permitted at a given location” (emphasis added)

This means that proposals are realistic and likely to be implemented during the plan period. This certainty requirement is further frustrated by the very restrictive criteria set out in criteria a. to d. of Policy EM1

Conclusion:

In conclusion, the RSPB is firmly of the view that to permit this proposed allocation, which would have significant adverse effects on a statutorily designated site of national nature conservation interest and on a threatened habitat of acknowledged importance, would be contrary to national and local planning policy and good practice, and to UK and Welsh legislation relating to the Welsh Government’s duties in relation to sustainable development, the protection of the environment, protection and enhancement of SSSI’s and the protection of UK, Welsh and Newport BAP and s42 priority habitats.

It would further be in conflict with established and widely recognised good planning practice in terms of environmental assessment, the resourceful use of land, and the use of supplementary planning guidance.

12 12 Speaking at Public Examination
I wish to speak because this matter raises issues which go to the heart of the plan and make it unsound.

Item Question
Soundness of LDP
Tick-box reply
Yes
No

Item Question Council Responses
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Large areas of employment land which fell within SSSIs/SINCs have been removed from the Plan. However, some areas still exist. The Council has to strike a balance between promoting economic growth and preserving environmental landscapes and this is what we believe has been achieved. With regard to employment land allocations still within SSSI, the Council will expect developers to provide sufficient mitigation to minimise the disruption to flora and fauna in these areas. This is clearly set out within the Plan.

The allocation of employment land in EM2 is not necessarily new net employment land. For example, Crindau and Llanwern Former Tipping Area already have industry located on them. The areas are considered to detract from the local environment and therefore in need of regeneration. Therefore regeneration proposals which come forward would not be generating net additional employment land. They would be replacing what’s already there with more modern business facilities which would regenerate the area. As a result, the noted ‘over provision’ of employment land is not as significant as the representation reports.

The largest area of remaining SSSI is within the EM1 Duffryn allocation. This area is part of a Welsh Government draft masterplan that is being prepared and will encourage employment to the area. The site totals 65ha of which 20.2ha are in SSSI designation. 2.2ha of this SSSI is already occupied by a waste water treatment works and a National Grid substation.
### Representation Details

**by:** (No grouping)

**Filtered to show:** (all of) Stage=L; Status=M

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**Document:** Revised LDP, p.79

**Policy:** EM01.05

**Summary:** Delete Gwent Europark employment allocation.

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<td>Delete an existing site</td>
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#### Soundness Test

C1 The allocation does not have regard to WG policy on the target for attaining favourable condition for SSSIs, because it would result in a deterioration of condition.

C2 The allocation does not have regard to WG planning policy on the protection and enhancement of SSSIs.

P2 The plan and its policies have not been subject to an adequate SA/SEA, because deficiencies in it have resulted in the site being proposed for allocation. Furthermore, the LPA has not had regard to the conclusions and recommendations of the SA/SEA with regard to the advisability of allocating this site, and has not clearly set out its reasons for not having regard to them.

C2 In proposing to allocate the site, the local planning authority has not had regard to the NERC Act with regard to the Newport Coastal and Floodplain Grazing Marsh priority habitat, and thereby PPW (national planning policy).

CE1 The lack of a policy on Biodiversity and the biodiversity process frustrates the creation of a coherent strategy, because it renders this important habitat, of which Newport holds the largest resource in Wales, vulnerable to destructive development, exemplified by the allocation of this site.

C2 By proposing to allocate this site, the local planning authority has not had regard to national planning policy in relation to designated sites.

CE1 The local planning authority’s approach to the allocation of this site is not coherent, because the site’s development would be damaging and contrary to WG planning and wider public policy.

C2 In allocating this site, the local planning authority has not had regard to national planning policy (PPW) in terms of certainty.
The RSPB objects to the proposed allocation EM1 (v) (Gwent Europark), for the following planning reasons:

1. The proposed allocation are located wholly within the Gwent Levels SSSI, which is a statutorily designated site of national importance for nature conservation, and part of a network of national sites.

2. NRW has identified the habitat type of the proposed allocation as Coastal and Floodplain Grazing Marsh. This is a UK and Welsh Biodiversity Priority Habitat type for which an action plan has been written. It has also been identified by the Welsh Government as a habitat of principal importance for the purpose of conserving biological diversity, pursuant of s42 of the NERC Act.

3. The proposed allocation would have significant and irreversible adverse impacts on the designated interest of the SSSI. These impacts will be both direct and indirect.

4. The proposed allocation would have significant and irreversible adverse impacts on the coastal grazing marsh habitat of acknowledged importance. These impacts will be direct and indirect, and will include the physical destruction of the habitat.

5. Welsh Government policy to prioritise brownfield development over greenfield development means that it would be developed after Newport’s very large brownfield land resource. Notwithstanding the question of referred to above, this would be several decades after the end of the plan period, which frustrates WG policy on the certainty and deliverability of LDPs.

6. To allocate this site would be contrary to the following:

   k. Section 28G of the NERC Act, which sets out the duties of the local planning authority, the Inspector, and the Welsh Government, with regard to the protection and enhancement of SSSIs.

   l. Section 42 of the NERC act, which sets out the Welsh Government, and the local planning authority, duties in respect of the UK BAP process with regards to the coastal grazing marsh habitat of acknowledged importance for biological diversity.

   m. Planning Policy Wales 2012, “LDP’s Wales 2005”, and TAN 5 (Nature Conservation) 2009, which sets out local planning authority and Welsh Government duties in respect of sustainable development, environmental protection and enhancement, statutorily designated sites of national nature conservation interest, the UK BAP and LBAP process, pollution, certainty and planning conditions and obligations.

   n. The Revised Deposit Draft Local Development Plan, in particular its approach to sustainable development, environmental protection and enhancement, statutorily designated sites of national nature conservation importance, the UK BAP and the LBAP process, replacement habitats, use of planning conditions and obligations, pollution and SEA/SA.

   o. The sustainability appraisal of the development plan and the strategic environmental assessment of the development plan.

Background:

The Gwent Levels:

The Gwent Levels SSSIs cover between them 5,700 ha of the Severn Estuary’s northern shoreline. These contiguous SSSIs represent the largest reclaimed lowland of National importance in Wales and are ranked amongst the 5 most important habitats of this type in the United Kingdom (The Gwent Levels, Their Importance for Nature Conservation, and Commitments for their Protection Martin Wragg, 1995). The statutorily designated conservation interest is to be found associated with the extensive network of reens and drainage ditches passing through the area. This drainage network supports 25 species of locally or Nationally scarce plants and 144 locally or Nationally scarce species of invertebrates. The wide variety of habitats within the Gwent Levels provides important feeding, roosting and breeding grounds for 8 species of wintering wader, as well as supporting populations of 13 species of mammals and herptofauna protected under the Wildlife and Countryside Act 1981. Reens and drainage ditches crossing these lowlands form fenceless field boundaries and many of these fields are categorised as coastal grazing marsh.
Likely Significant Adverse Impacts of the Proposed Allocation on the Biodiversity Value of the Site:

The likely significant adverse impacts arising as a result of the development of the site are both direct and indirect

Direct:

• Physical destruction of the Coastal and Floodplain Grazing Marsh (UK, Welsh and Newport Priority Habitat) through built development. It would not be possible to mitigate for this adverse impact

• Physical destruction of the reen SSSI notified interest through built development. It would not be possible to mitigate for this adverse impact.

Indirect:

Eutrophication: Landscaping would be required as part of the development. This would involve tree-planting. Leaf fall would cause eutrophication of the reens, (SSSI feature) which would significantly adversely impact on water quality. The flora and fauna of the reens rely on very high water quality, and are very sensitive to falls in quality. Please see assessments of a sample of post-construction monitoring studies carried out pursuant to planning conditions in respect of consented application for more information in respect of this matter. It would not be possible to enforce a planning condition in relation to this matter.

Chemical Pollution of Reen Interest: Hydrocarbon runoff from hard surfacing, and diffuse pollution from herbicides, pesticides and insecticides associated with maintenance of the prestige developments. It would not be possible to frame a planning condition or obligation, or enforce them, in relation to this matter, because inter alia it would not be possible to isolate individual sources of such pollution, or to stop them from entering the hydrological system, upon which the SSSI and Coastal and Floodplain Grazing Marsh interest depends.

Blocking of Management of Coastal and Floodplain Grazing Marsh (UK, Wales and Newport Priority Habitat) and Reens (SSSI): In the interests of health and safety, development would be likely to block access on the part of the machinery which is required to operate in or in close proximity to Coastal and Floodplain Grazing Marsh and reens.

Water Level Fluctuations: Fluctuations in water level during and following development can have profound effects on invertebrate populations. This is especially so when ditches are temporarily drained to allow construction, and as a result of rapid runoff from impervious surfaces such as car and lorry parks. As the site is located within the floodplain, and requires a Strategic Flood Consequences Assessment, drainage would be required to develop the site.

National and Local Policy Context:

Section 28G of the Wildlife and Countryside Act 1981, as amended by the Countryside and Rights of Way Act 2000

The Council has a duty in respect of Sites of Special Scientific Interest (SSSIs) under (hereafter referred to as the CROW Act). This duty affects the weight the Council should give to the conservation and enhancement of SSSIs in exercising its statutory planning functions, including the preparation of development plans and relevant proposals for land-use allocations.

The following are section 28G authorities-

(a) A Minister of the Crown (within the meaning of the Ministers of the Crown Act 1975) or a Government department;
(b) The Welsh Government (hereafter referred to as the WG) and an Inspector appointed by the WG
(c) A local authority;

Paragraph 45 of the Assembly’s Circular 31/2001 (Countryside and Rights of Way Act 2000) makes it clear that the section 28G duty applies whenever a local authority is exercising its functions.
"New section 28G, inserted in the 1981 Act, imposes an important new duty on public bodies, exercising statutory functions that may affect SSSIs, to take reasonable steps, consistent with the proper exercise of these functions, to further the conservation and enhancement of the features for which the site is of special interest. Public bodies specifically include local authorities and the duty applies wherever they are exercising their functions. The Welsh Government expects public bodies to apply strict tests when carrying out functions within or affecting SSSIs, to ensure that they minimise adverse effects, and to adopt the highest standards of management in relation to SSSIs that they own." (emphasis added)

Para 5.4.3 of PPW states:

"This duty applies to the Welsh Ministers, Ministers of the Crown, local planning authorities, statutory undertakers and any other public body"

From this guidance, it is clear that in preparing its new LDP the local planning authority should have:

• "Taken all reasonable steps to ensure it conserved and enhanced all of the SSSIs within its area;
• In identifying potential land-use allocations, favouring those that would avoid adverse effects on SSSIs;
• Applied strict tests to any land-use allocations that could damage an SSSI to ensure that adverse effects could be mitigated in full in order to avoid such damage;
• If land-use allocations were to be pursued that were likely to cause damage to SSSIs (even with mitigation) that such damage could be fully justified i.e. it should clearly override the national importance of the SSSI and the Council had no less damaging alternative sites available to meet the identified need, and
• That appropriate habitat compensation could be provided for any likely damage to a SSSI likely to arise from such an allocation and that proper provision was made in the plan policy for such compensation to ensure that the interest of the SSSI network was conserved"

(emphasis added)

It is the view of the RSPB that, by proposing this damaging allocation, the Council has not taken all reasonable steps to ensure it conserved and enhanced all of the SSSIs within its area. It has failed to apply strict tests to any landuse allocations that could damage a SSSI, and has failed to show that adverse effects cannot be adequately mitigated or compensated for. It has thus failed to set out how, in its view, the proposed allocation clearly override the national importance of the SSSI (merely stating that they would be "prestige", and not providing any economic tests which would be used to decide whether or not an application is of UK-national importance), failed to identify need, and failed to show conclusively that it had no less damaging alternative sites. It has furthermore failed to provide appropriate habitat compensation to ensure that the interest of the SSSI network was conserved

The UK, Welsh and Newport Biodiversity Processes, and s42 and s41(3) of the Natural Environment and Rural Communities Act 2006

Over and above its designation of an SSSI, the site of the proposed allocation consists of Coastal and Floodplain Grazing Marsh, which is a Priority Habitat under the UK and Welsh Biodiversity processes for which a Habitat Action Plan (hereafter referred to as HAP) has been produced at the UK and Newport levels, and is in preparation at the Welsh level. Coastal and Floodplain Grazing Marsh is also placed on a list pursuant of section 42 of the NERC Act, as being considered by the Welsh Government as being of principal importance for the purpose of the conservation of biological diversity.

Paragraph 5.2.2 of PPW states that the NERC Act places a duty on local planning authorities (and the WG) to take (and to encourage others to take) reasonably practicable steps to further the conservation (including restoration and enhancement) of Priority Habitat types. The selection criteria for Priority Habitat types are that they must be habitats for which the UK has international obligations, habitats at risk, such as those with a high rate of decline, especially over the last 20 years or which are rare, habitats which may be functionally critical and habitats which are important for Priority Species

The RSPB is of the view that to reject this proposed allocation would be to take a reasonably practicable step to further the conservation of this habitat type, which is of acknowledged importance. This
duty applies to the WG itself. The Newport Coastal and Floodplain Grazing Marsh HAP cites eutrophication as a primary, widespread threat, and industrialisation and urbanisation as localised threats. The RSPB concurs with this, considers that the proposed allocation, would result in eutrophication. The RSPB concurs with the HAP that industrialisation and urbanisation, as exemplified by this proposed allocation is a threat to Coastal and Floodplain Grazing Marsh.

The Newport Revised Deposit Draft LDP:

Para 2.4.1 of PPW states: -

"National planning policies in Planning Policy Wales should not be repeated"

As the protection of nationally important statutorily designated sites for nature conservation is national policy, it is not addressed in the Newport Revised Deposit Draft LDP, therefore please see below for an analysis of this issue

UK, Welsh and Newport Biodiversity Processes:

The RSPB objects to the lack of a plan policy in relation to biodiversity, and the biodiversity processes. Please see separate representation form.

Planning Policy Wales 2012

Sustainable Development and Planning Policy Wales 2012:

Paragraph 1.4.3 of Planning Policy Wales 2012 (hereafter referred to as a PPW) states that the Welsh Government has a specific duty regarding sustainable development, namely that "it the (WG) promotes sustainable development", via the s79 of the Government of Wales Act 2006.

Paragraph 1.4.3 further states that this duty has implications for the planning system.

It is the thus the view of the RSPB that the WG duty in relation to sustainable development set out in the Government of Wales Act must be addressed through inter alia the town and country planning system in Wales, and that to approve this proposed allocation which would have a material adverse impact on statutorily designated sites of national nature conservation importance a UK Biodiversity Priority Habitat would be counter to sustainable development, and thus to the Government of Wales Act 1998.

Paragraph 4.1.4. of PPW, in setting out how the Welsh Government promotes sustainable development, states that it is:-

"placing sustainability at the heart of its decision making processes" (Bullet Point1).

In respect of the Coastal and Floodplain Grazing Marsh Priority Habitat, para 5.4.2 of PPW states that the town and country planning system in Wales must: -

"forge and strengthen links between the town and country planning system and biodiversity action planning particularly through policies in local development plans"

It is the view of the RSPB that this emphasis on promoting sustainable development through decision-making means that the proposed allocation should be deleted from the Revised Draft LDP.
The Environmental Element of Sustainable Development

Paragraph 4.4.1 states that WG’s key policy objectives should be taken into account in the preparation of LDPs.

The WG’s principles in relation to sustainable development, as set out in paragraph 4.1.2 of PPW, elucidates the environmental element of sustainable development, through stating in Bullet Point 4 that environmental limits will be respected. The RSPB considers that were this allocation to be permitted, environmental limits would not be respected.

Paragraph 4.4.2 (Bullet Point 7) cites planning as a key policy tool contributing to the protection and improvement of the environment so as to protect local and global ecosystems. In particular planning should “seek to ensure that development does not produce irreversible harmful effects on the natural environment”. Bullet Point 7 further cites as an objective the conservation and enhancement of statutorily designated sites and the conservation of biodiversity.

Chapter 5 of PPW contains the WG’s planning policy relating to conserving and improving natural heritage.

Statutorily Designated Sites:

Paragraph 5.1.2 (Bullet Point 3) states the WG’s objectives in relation to this matter include ensuring that statutorily designated sites are properly protected. It is the RSPB’s view that the Gwent Levels, as a statutorily designated site should be protected from damaging development.

Paragraph 5.3.2 states that regard should be had to the relative significance of international, national, and local designations when considering the weight to be attached to nature conservation interests. As the Gwent Levels SSSI is designated at the national level and therefore towards the top of the hierarchy, the RSPB is of the view that significant weight should be attached to this proposed allocation, which would have a material adverse impact upon them.

Paragraph 5.3.1 states that statutorily designated sites make a vital contribution to protecting biodiversity. The RSPB concurs with this.

Paragraph 5.3.9 of PPW states that the WG will ensure that statutorily designated sites (of which the Gwent Levels SSSI is one) are protected against damage and deterioration (consistent with the objectives of the designation). The RSPB considers that to permit this proposed allocation would be to fail to comply with this requirement.

Para 5.2 of PPW further states that:-

“local planning authorities should further the conservation of habitats of principal importance through their planning function”

This strengthens the materiality of the need to protect this habitat via the LDP

A further principle, as set out in Bullet Point 8 of para 4.3.1, states that pollution should be prevented as far as possible and that the polluter pays for damage resulting from pollution. The RSPB considers that eutrophication of the SSSI reen interest which is likely to occur as a result of the development of their proposed allocation is a form of pollution.

Supplementary Planning Guidance “Wildlife and Development” 2010:

Section 3, Bullet Point 4 (page 6) of the Supplementary Planning Guidance “Wildlife and Development” 2010 states :-

“The Council has an obligation to protect (legally protected sites) as part of the planning process”
The RSPB considers that to delete this site would be in conformity with his obligation.

Table 1 (page 8) of the SPG states that, in relation to nationally important designated sites, there is a:

"Strong presumption against damaging development"

As the RSPB considers that the development of this site would be damaging, the Council would, if it wishes to allocate the site, have to surmount this strong presumption. The RSPB considers that it has failed to do so.

The Brownfield Test:

Para 4.8.1 of PPW states:

"Previously developed (or brownfield) land should, wherever possible, be used in preference to greenfield sites, particularly those of high ecological value"

The SSSI designation, and UK, Wales and Newport Biodiversity Priority Habitat classification of the Gwent Levels shows that they are of high ecological value, and the fact that there is no need for the proposed allocation shows that it is possible to use brownfield land in preference.

Policy SP1 of the Revised Deposit Draft LDP (criterion (ii)) states:

PROPOSALS WILL BE REQUIRED TO MAKE A POSITIVE CONTRIBUTION TO SUSTAINABLE DEVELOPMENT BY CONCENTRATING DEVELOPMENT IN SUSTAINABLE LOCATIONS ON BROWNFIELD LAND WITHIN THE SETTLEMENT BOUNDARY. THEY WILL BE ASSESSED AS TO THEIR POTENTIAL CONTRIBUTION TO:

i) THE EFFICIENT USE OF LAND;
ii) THE REUSE OF PREVIOUSLY DEVELOPED LAND AND EMPTY PROPERTIES IN PREFERENCE TO GREENFIELD SITES;

The RSPB supports this policy, and furthermore believes that with the largest brownfield resource in Wales, it is possible to act in conformity with it.

Paragraph 1.21 of "LDP’s Wales 2006" states:

"it is important that proposals are... likely to be implemented during the plan period".

Conclusion:

In conclusion, the RSPB is firmly of the view that to permit this proposed allocation, which would have significant adverse effects on a statutorily designated site of national nature conservation interest and on a threatened habitat of acknowledged importance, would be contrary to national and local planning policy and good practice, and to UK and Welsh legislation relating to the Welsh Government’s duties in relation to sustainable development, the protection of the environment, protection and enhancement of SSSI’s and the protection of UK, Welsh and Newport BAP and s42 priority habitats.
It would further be in conflict with established and widely recognised good planning practice in terms of environmental assessment, the resourceful use of land, and the use of supplementary planning guidance.

I wish to speak because this matter raises issues which go to the heart of the plan and make it unsound.

The Gwent Europark site is partly developed. It is very well located for access to the motorway and railway network. The LDP acknowledges that the site is within a SSSI and therefore conservation and enhancement of the SSSI features will be key when considering employment proposals. It also stipulates that Environmental Impact Assessment Regulations will need to be complied and mitigation and compensatory measures may be sought as part of any planning proposals. The Gwent Europark will remain as an allocation.
**Newport City Council Local Development Plan**

**Representation Details**

by: (No grouping)

Filtered to show: (all of) Stage=L; Status=M

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**Document:** Revised LDP, p.81, para.6.22

**Policy:** EM02.07

**Summary:** Crindau Masterplan should acknowledge the existing surrounding land uses.

**Item Question**  Representation Text

**4** A new paragraph or new text

**10** Soundness Test

The LDP is unsound in relation to test CE4 for the reason outlined below.

- Sainsbury's Crindau provides Newport with a key focal point at a gateway site close to a strategic link into and out of the city. While we support the updating of the Crindau Masterplan, as referred to at paragraph 6.22 of the Deposit LDP, we consider that one of the specific aims of this exercise must be to ensure the resulting (residential) development has full regard to existing recent development in the area. Specifically, the detail of any residential development must ensure that the supermarket can continue to operate successfully, providing a wide range of products and consumer choice, whilst acting as a key employer for Newport and its hinterland. We consider that changes to paragraph 6.22 are required to ensure the updated Crindau Masterplan, (and therefore any subsequent application and development) recognises and takes account of the SSL development, site layout and operational requirements (including the need for overnight servicing activity). Future surrounding residential development must not unreasonably restrict SSL’s operations.

Our proposed amendment is as follows:

"A masterplan is to be updated for this key gateway site that is considered suitable in principle for a mix of uses, including residential. This allocation also reflects the Newport Unlimited 2020 Vision for regeneration of the area. A Strategic Flood Consequence Assessment for the Plan identifies this site as being at significant levels of flood risk and as such the site is allocated as a regeneration site for a mix of uses. The site is allocated due to the opportunity for regenerating an inner City brownfield, gateway site with potential improvements development could bring to flood management for the site and its surroundings. Any proposal would require a Flood Consequence Assessment at the planning application stage. This assessment would require hydraulic modelling to be undertaken. In accordance with Policy GP5, the developer will be expected to provide sufficient information in order for a Habitat Regulation Assessment to be undertaken to ensure there are no likely significant effects upon the River Usk SAC and the Severn Estuary SPA and Ramsar site. The updated masterplan and any subsequent development proposal will need to take full account of existing residential and commercial development in the locality which is proposed to remain in place, ensuring that residential amenity and commercial operations are not prejudiced."

**12** Speaking at Public Examination

It is considered the Inspector would benefit from being able to examine the importance of ensuring that the revised Masterplan safeguards this commercial gateway site with the assistance of our client, and in line with Test CE4.

**Item Question**  Council Responses

**2** Soundness of LDP

Tick-box reply

No

**13** Council Response

The Council has agreed to the suggested changes, except for the final sentence of the proposed amendment, which will be considered during the production of an SPG. It is considered that the inclusion of the last sentence in the supporting text would make the policy onerous.
Document: Revised LDP, p.75, para.6.6

Policy: H15.01

Summary: Does not support the proposed Gypsy and Traveller Transit Accommodation at Celtic Way.

Representation Details

Item Question: Soundness Test

C1, C2, CE1, CE2

10  Soundness Test

11  Representation

Policy Number EM1(i) H15(i)

Whilst the Welsh Government recognises the need and importance of providing residential and transit sites for gypsies and travellers within Newport, it does not support the present allocation policy no H15 (i) to site a transit site within the Duffryn Strategic Business Park allocation EM1 (i). Para 6.6 of Policy EM1 recognises the importance of the Duffryn employment allocation in bringing forward the most prestigious employment investment to Newport in recent years. The Welsh Government also recognises the site as its key asset in which to focus investment within Newport during the plan period. It is considered that the siting of the transit camp in this location would result in the loss of valuable employment land which PPW and the deposit plan LDP seeks to protect. It is also considered that the proposed allocation would also have an adverse effect on the potential for generating future investment for surrounding employment land, limiting the scope of employment uses which maybe considered to have an adverse impact upon the amenities of the residents of the transit camp. Therefore consider the allocation to be unsound and seek its deletion from the plan. WG will engage with Newport to identify more appropriate sites on its other land assets.

Item Question: Speaking at Public Examination

12  Speaking at Public Examination

No

Item Question: Soundness of LDP

2  Soundness of LDP

No

Item Question: Council Response

13  Council Response

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

Officers have met with WG officials regarding the offer of other land assets, however WG was unable to offer any alternative suitable sites due primarily to its other land holdings being on the route of the proposed M4 relief road.
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<td>&quot;a primary school will be required as part of the development&quot;</td>
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|              | "the Council will seek to negotiate the provision of a primary school on site or alternatively, appropriate financial contributions to the provisions of a primary school on site or off site as part of a comprehensive development of the Whiteheads site."
|              |                      |
|              | Whilst the Welsh Government supports this allocation, there are significant costs associated in bringing this key brownfield site forward for development. The requirement to provide a primary school as part of any development could however undermine the viability of any future scheme. Consequently, the funding mechanisms for the provision of the school should take into account site viability and constraints in order to deliver the key regeneration objectives of the plan and meet the requirements of soundness test CE2. |
|              | CONFIDENTIAL VIABILITY INFORMATION TO JUSTIFY THIS REPRESENTATION HAS BEEN SENT TO THE COUNCIL. |
| 12 12        | Speaking at Public Examination | No |
| 2 2          | Soundness of LDP      |

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<td>No change proposed. Viability information has been submitted to the Council and has been considered. However, this information is subject to change over time. If development of the site does not occur for a number of years, then financial viability figures are likely to change. On the commencement of more detailed planning discussions and the submission of an application, if viability information demonstrates that an onsite school is not deliverable, then the Council will have to consider this against its desire to bring the site forward.</td>
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Newport Local Development Plan – Revised Deposit:

Thank you for your letter of 13th June including copies of the Revised Deposit Local Development Plan (LDP) and accompanying documentation.

We note that the level of housing provision in the plan is a deviation above the Welsh Government 2008 projections. Whilst we do not object to the level of housing proposed, it is important that the local authority has appropriately justified the deviation in accordance with the criteria stated in PPW (paragraph 9.2.1), including the LDP strategy and key issues. The matter of whether a plan is considered 'sound' will be for the appointed Planning Inspector to determine. I have considered the Deposit LDP in accordance with the consistency/coherence and effectiveness tests, and principally in accordance with whether satisfactory regard has been given to national planning policy (test C2). The Welsh Government’s representations are separated into 4 categories which are supported with more detail in the attached annex.

Category A: Objection under soundness tests C2, CE2: Fundamental issues that are considered to present a significant degree of risk for the authority if not addressed prior to submission stage, and may have implications for the plan’s strategy:

- None.

Category B: Objections under soundness tests C2, CE1, CE2: Matters where it appears that the deposit plan has not satisfactorily translated national policy down to the local level and there may be tensions within the plan, namely:

- (i) Affordable Housing – Targets, Thresholds & Commuted Sums
- (ii) Minerals - Safeguarding and Land bank
- (iii) Renewable Energy

Category C: In relation to soundness tests CE2, CE3, CE4: whilst not considered to be fundamental to the soundness of the LDP, we consider there to be a lack of certainty or clarity on the following matters which we consider we can usefully draw to your attention to enable you to consider how they might be better demonstrated:

- (i) Employment Provision – scale; deliverability and safeguarding
- (ii) Delivery – Infrastructure and Gypsy and Traveller Sites
- (iii) Monitoring

Category D: Matters relating to clarity of the plan generally which we consider may be of assistance to your authority and to the Inspector in considering suitable changes:

- Please refer to annex.

It is for your authority to ensure that the LDP is sound when submitted for examination and it will be for the Inspector to determine how the examination proceeds once submitted. You should consider how you could maximise the potential of your LDP being considered ‘sound’ through the examination process. An early meeting is considered important to discuss matters arising from this formal response to your deposit LDP and I would encourage you to contact me to arrange a mutually convenient time.
NCC has explained housing requirement (including deviation from WG figures) in SP10. It is not felt that further information/justification is necessary.

G&T sites and the criteria for their selection are made quite clear in Policies H15, H16 and H17 (as well as background papers/reports).

With regard to employment land, the policies and their supporting text refer to the consultants’ report and outline the rationale for the suggested provision.

Consideration will be given to clarifying the link between national policy and LDP policies in the appropriate sections (that is, affordable housing, minerals and renewable energy).
**Representation Details**

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**Document:** Deposit Plan, p.70  
**Policy:** H04  
**Summary:** Category B - Affordable Housing Objections

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<td>Category B. Objections under soundness tests C2, CE1, and CE2: Matters where it appears that the deposit plan has not satisfactorily translated national policy down to the local level and there may be tensions within the plan, namely:</td>
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|               | i) Affordable Housing  
|               | On the 17th July the Minister for Housing and Regeneration announced changes to Building Regulations Part L, including changes to domestic fire safety measures (sprinklers). These proposals introduce a requirement to reduce greenhouse gas emissions by 8% from 2010 levels. These proposals will be effective from 2014 and are the equivalent of what is currently required under TAN 22. The total costs for implementing these changes will be £3100 per unit. This is a reduction from the £7300 per unit that was originally consulted upon and formed the basis for the viability work and hearing discussions in previous examinations. The authority should clarify how these reduced costs do not impact on the viability work and the affordable housing policy in the LDP. |
|               | ii) Affordable Housing Target  
|               | It is disappointing that the updated Affordable Housing Background Paper does not take account of our previous concerns with 'blanket' policy approach still being pursued. Policy H4 Affordable Housing includes requires a 10 unit threshold and a 30% target for affordable housing. The evidence indicates that a three way split could better reflect market circumstances (40% Caerleon and Rural Newport, 30% Rogerstone and Newport West, 10% for Newport East, Malpas and Bettws). It is not clear why this option was discounted as the study indicates this option would maximise the delivery of affordable housing over the plan period, particularly as this is a key Ministerial priority and a key issue in the plan. Paragraph 5.14 of the Revised Deposit Plan uses the work maximum. This is not appropriate as there may be cases where a higher figure could be achieved, based on viability. Achieving a higher level of delivery should not be precluded by the policy, provided it is based on robust evidence. |
|               | iii) Affordable Housing Thresholds  
|               | The evidence suggests that a lower threshold would increase the supply of affordable housing. For example, Table 5.1 of the Viability Study (Affordable Housing Background Paper 2013) shows that 267 dwellings were given planning permission on sites of 1-9 units in the past three years. This equates to 23% of permissions over this period (approx. 90 units per annum). The Viability Study also notes the locations with the highest values have a greater reliance on small sites. It is not clear why a threshold of 10 units in urban areas has been deemed appropriate for the plan. Lower thresholds should be set to maximise delivery. |
|               | iv) Commuted Sums  
|               | There is also scope to consider the use of commuted sums, particularly to address the issue of part delivery. The use of commuted sums should not be considered as exceptional within the context of Newport. For example the viability work suggests that areas such as Caerleon have far greater residual land values and are therefore more viable than others. |

**Item Question**  
**Council Responses**
Council Response

The full comment from Minister Carl Sargeant, states that: 'I have concluded that I will introduce, through amendments to Part L, a requirement to reduce greenhouse gas emissions by 8% from 2010 levels. This is lower than the 40% originally consulted upon. I believe that this constitutes a balanced approach - improving our emissions position without undermining the objective to build. It provides regulatory backing for reductions which are currently sought through planning guidance. This will support more consistent delivery across the housing market, whilst having a close to cost neutral affect on building costs. I believe this is important given the nature of the current housing market and the need to stimulate housing supply and get builders building. In addition, this approach does not prevent voluntary implementation of further increases in energy efficiency by the industry.

The key statement here is This will support more consistent delivery across the housing market, whilst having a close to cost neutral affect on building costs

If the housing market in any way follows past performance (and in many parts of the UK this is already happening) then we should see significantly improved viability during the period of implementation of Part L.

Meanwhile, fire sprinklers will be introduced to high risk properties from April 2014 (care homes, new shared student accommodation, hostels etc) but will not apply to new and converted houses and flats until January 2016. Again, the direct quote is to give..."the sector the opportunity to innovate and reduce the costs of installing sprinklers."

The financial viability assessment for the Community Infrastructure Levy (CIL) work will be revised taking into account this revised figure. The CIL work can then be fed into the evidence base for the plans at examination.

The affordable housing background paper sets out the reasoning behind the use of the ‘blanket’ 30% policy. The justification is that there are only 9 housing proposals as well as windfall sites available for negotiations to affordable housing. The table in section 4 outlines that it is the implementation of the blanket policy that results in the greatest level of provision to meet the Local Housing Market Assessment identified need of 86%. Therefore a reduced target i.e. 10% or 0% under the split approach would not do enough to assist in meeting what is a ministerial priority. Each application received which requires an element of affordable housing is tested against the site’s viability, this ensures that the maximum provision is being achieved whilst taking into account the sensitivities associated with wider housing delivery.

Agree to amend the paragraph 5.14 to clarify that the 30% is not viewed as a maximum figure. The supporting text will be amended to read:

'It is recognised that 30% is a realistic figure of what schemes are likely to be able to sustain...'

There are concerns that the use of split level targets will impact on the renegotiation of already agreed sites, who may decide to apply for a reduced level of affordable housing provision therefore resulting in a loss of affordable housing already secured.

Town and Country Planning (Development Management Procedure) (Wales) Order 2012 notes "major development" is the total number of dwellings to be 10 units and over. This is consistent with the annual Joint Housing Land Availability (JHLAS) process undertaken as part of the requirement of TAN1. The threshold of ten units for affordable housing reflects this definition thereby assisting with the administration and assessment process. The economy of scale also comes in to play here with such sites, totalling fewer than 10 units, not usually being supplied by the large house building companies. Major house builders enjoy the advantages of economies of scale from mass construction. Schemes of 9 units and below are generally built by local house builders, whose construction costs are markedly higher. In order to encourage house building and the local economy it seems prudent that minor sites in urban areas, which do not provide a significant level of affordable provision, are set below the threshold. To add to this when reviewing the period 2009 to 2011 the data illustrates that out of 44 housing sites, providing less than 10 units in an urban area, only 8 sites had provided more than 3 units and, therefore, able to provide a physical affordable unit. When the 30% threshold is applied this would have resulted in an addition of 12 units over the 3 year period. It is clear from this data that there are a limited developments which provide between 3 and 9 units in Newport therefore the threshold as set in Policy H4 is deemed appropriate.

It is understood that within the urban area most sites will have an element of abnormal costs to deal with e.g. land remediation. It is also appreciated that such sites are delivered through smaller house builders who are unable to achieve the same economies of scale. Taking all this into account and the Council’s prioritisation of gaining built units over commuted sums, it is considered that the thresholds achieve the required supply.

Newport prioritises the delivery of built units over commuted sums due to the fact that there is an evidenced requirement for a very high level of need and the objective of the Council to create balanced communities. The use of commuted sums is not excluded but is only considered appropriate in exceptional circumstances. It is logistically difficult to spend sums in wards where land prices are high and there are limited empty properties to bring back to use or sites allocated/ available for development. Section 106 guidelines dictate that such sums will need to serve the development and not be provided further afield. The supporting text to the policy notes that the detail of the policy will be set out in Supplementary Planning Guidance (SPG) which will include clarification as to the use of
Representation Details

Rep'n/Para/Policy     Representor     Agent     Accession No     Date Lodged     Late?     Source     Type     Mode     Status     Status Modified

244.L3//SP22 Welsh Assembly Government 31/07/2013 E M

Document: Revised LDP, p.36
Policy: SP22
Summary: Category B - Minerals Objections

Item Question Representation Text
11 Representation

Category B. Objections under soundness tests C2, CE1, and CE2: Matters where it appears that the deposit plan has not satisfactorily translated national policy down to the local level and there may be tensions within the plan, namely:

ii) Minerals

Mineral Safeguarding

It is unclear whether the safeguarding areas on the Proposals Map align with the Aggregates Safeguarding Map of Wales. The mineral background paper (paragraphs 1.5 & 3.3) refers to the National Aggregates Safeguarding Map of Wales as being incomplete. However, the Aggregate Safeguarding Map was published in November 2012. The Welsh Government (14th November 2012) updated local planning authorities of the changes. The aggregate safeguarding areas include the additional ‘safeguarding margin’.

Minerals Land bank

The plan is not compliant with the statutory requirements set out in national planning policy.

Minerals Technical Advice Note 1: (MTAN1) Aggregates (paragraph 49) requires a minimum 10 year land bank of crushed rock and minimum 7 year land bank for sand and gravel to be maintained during the entire plan period. MPPW (paragraph 14) requires the LDP to provide clear policies and proposals as to where mineral extraction should, or is most likely to take place. The mineral planning authority should clearly identify on the proposals map, specific sites/preferred areas or areas of search. The Former Gwent Aggregates Safeguarding Study, Cuesta (2009) report commissioned by NCC along with former Gwent authorities found that there is potential for allocations to be made in the form of areas of search. NCC does not identify areas of search or a preferred area in the plan. The authority is not compliant with the RTS requirement of providing 8 – 8.5Mt of non-energy minerals. The authority has not properly explained the reasons for this non-compliance. Whilst it is acknowledged that the council approached neighbouring authorities with an identified surplus of reserves, it is disappointing that the authority did not undertake the relevant collaboration earlier in the LDP process. Monmouthshire County Council’s partial solution (7 June 2013) is encouraging, however, it remains unclear as to the exact tonnage and location of mineral that would be apportioned to Newport. Policy M2 needs to be written to facilitate an appropriate supply of resources, when required.

Council Responses

Clarification will be provided that the safeguarding areas identified on the proposals plan are from the Aggregates Safeguarding Map of Wales. Newport City Council does not have a landbank of hardrock or sand & gravel resources, so the RTS requirement of 8 – 8.5 million Tonnes is nonsensical. The work undertaken by Cuesta consultants for the Former Gwent Authorities noted that Newport had limited prospects for identifying areas of search let alone site specifics. The two areas e.g. North West (overhang of Machen Quarry) and North East (overhang of Penhow Quarry) can be linked to the edge of existing sites and the industry itself has shown no interest in these areas. Nonetheless they are designated within the safeguarding areas of the All Wales aggregate safeguarding plan thereby protecting the resources from sterilisation.

Communications with all neighbouring authorities has taken place, however it is only Monmouthshire that has indicated the potential for assisting with Newport’s apportionment. This is all taking place in the areas of the review of the Regional Technical Statement (RTS). The most recent draft indicates that due to the lack of previous supply and available resources Newport will not have an apportionment to find. This is still to be agreed nationally, however it supports the previous approach undertaken by Newport City Council and would form a revised evidence base.
## Item Question: Representation

11. Representation

Category B. Objections under soundness tests C2, CE1, and CE2: Matters where it appears that the deposit plan has not satisfactorily translated national policy down to the local level and there may be tensions within the plan, namely:

iii) Renewable Energy

PPW states that local planning authorities should guide appropriate renewable and low carbon energy development by undertaking an assessment of the potential of all renewable energy resources and renewable and low carbon energy opportunities within their area and include appropriate policies in development plans. Although a study has been undertaken for Newport City Council and Torfaen County Borough Council to provide an evidence base, this is not reflected in the LDP. Policy CE11 Renewable Energy is a generic policy which would not guide appropriate renewable and low carbon energy development and, as it contains a number of ambiguous statements, does not set out clearly the criteria against which proposals will be evaluated. Further consideration is required on how to translate the evidence base into a policy format.

## Item Question: Council Responses

13. Council Response

Change wording of para 4.50, 4th sentence - The Council has undertaken a Renewable Energy Assessment. This sets out the potential for renewable energy resources and technologies within Newport. It should be considered when assessing renewable energy proposals, and the potential contribution renewable energy can make within development.

In relation to the comments regarding the ambiguity of Policy CE11, the supporting text seeks to outline the Authority’s stance on technologies, in particular solar and wind, which have been developed in the area in the past and that are considered likely to come forward in the future.

In relation to criteria against which renewable energy proposals would be assessed, the criteria based policies set out in the General Policies chapter are applicable to all types of development. Policies GP2, GP5, and GP6 would be of particular relevance to a renewable energy development. These are considered to sufficiently cover development management issues that need to be addressed in the consideration of renewable energy developments.
Employment B Scale

With regard to the Employment Land Review (ELR) March 2013 we consider that while the authority has made significant progress in quantifying the level of employment provision, there remains a large disparity between the employment land requirement of 35ha and the substantial allocation of land within Policy EM1 Employment Land Allocations and EM2 Regeneration Sites.

The table below has been derived from the updated employment figures in the ELR. The table shows that land is allocated for around 350ha for employment use, excluding those existing employments sites under Policy EM3 and EM4. This represents a 90% flexibility allowance. Whist we acknowledge there should be sufficient flexibility for ‘churn and market’ choice, this overprovision is far in excess of the 35ha requirement.

- Llanwern Steel Works Eastern End - 39.5ha
- Phoenix Park - 2ha
- Llanwern Former Tipper Area - 122ha
- Old Town Dock - 32.75 (Unable to determine employment element from policy or ELR (includes B1)
- Godfrey Road - 2ha
- Crindau - 10ha (New employment use is preferred)
- Whitehead - 2ha
- Monmouthshire Bank Sidings - 1.2ha
- Novelis (Alcan) - 1.5ha

Total Employment Allocation EM2 = 180ha (Excluding Old Town Dock)

Total Plan Allocation (EM1+EM2) = approx. 350ha (excluding EM3 Docks Safeguarding Policy)

We seek assurance that the strategy will not be diluted through this over provision, especially in light of market and physical constraints and issues surrounding deliverability. (See comments in respect of Employment Site Deliverability below). The authority should clarify that oversupplying the market to this extent will not have negative implications for land values; not hinder development from coming forward or jeopardise growth aspirations. The plan needs to make clear, in line with the evidence base, as to what proportion of employment land is allocated within EM2.
### Representation Details

**Filtered to show:** (all of) Stage=L; Status=M  
**Rep'n/Para/Policy** | **Representor** | **Agent** | **Accession No** | **Date Lodged** | **Late?** | **Source** | **Type** | **Mode** | **Status** | **Status Modified**
---|---|---|---|---|---|---|---|---|---|---
13 | Council Response | | | | | | | | |  

For clarification, almost all of Old Town Dock (32.75ha) will be for residential development.

For EM1, we’re allocating 168ha of new employment land. It’s acknowledged that this is much higher than the 35ha requirement. However, we are trying to ensure a range and choice is available for prospective employers. We would not want to be in a situation where we turned employers away for not having enough land.

Between 2000 and 2009, 102.6 ha of employment land was developed in Newport. As we’re now exiting the recession, and as noted above, we want to be sure that enough land is available and demonstrate that Newport is ‘open for business’. The economic growth of the South East Wales city region and proposed infrastructure such as the M4 relief road and metro have the potential to significantly boost demand for employment land.

EM2 sites wouldn’t necessarily be ‘new employment land’. For example, Crindau and Llanwern Former Tipping Area already have industry located on them. The areas are considered to detract from the local environment and therefore in need of regeneration. Therefore regeneration proposals which come forward would not be generating net additional employment land. They would be replacing what’s already there with more modern business facilities which would regenerate the area.

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244.L6//EM01.01 Welsh Assembly Government  
**Document:** Revised LDP, p.79  
**Policy:** EM01.01  
**Summary:** Question delivery of Duffryn/Queensway Meadows employment site

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**Item Question** | **Representation Text**
---|---
11 | Employment Land - Deliverability  

Whilst we support the principle of a regeneration growth strategy, there are discrepancies in bringing forward sites in relation to constraints, viability and delivery, some being of greater risk than others (as set out in the ELR). The sites need further examination. Examples:

Policy EM1 (Dyffryn & Queensway Meadows, 100ha) – Safeguarded for single large user projects of ‘national significance’ at least 10ha. The Welsh Government does not object to such an approach but it is unclear as to what market sectors these sites would attract.

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**Item Question** | **Council Responses**
---|---
13 | Council Response  

The Duffryn Site is being marketed by Welsh Government. They are preparing a master plan for the area and have an interested party who intend to develop the site. Unfortunately, Welsh Government is treating this information as confidential and is not able to share anything about the delivery of the site. We do not think there is a prospective developer for Queensway Meadows at this stage, but this may very well change over the Plan Period.
### Representation Details

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Document: Revised LDP, p.79
Policy: EM01.04

Summary: Question delivery of the Solutia Site

#### Item Question
Representation Text

**11 11 Representation**

Policy EM1 (Solutia, 45ha) – Land ownership constraints and part of the area is likely to be used for the company’s expansion. The ELR states that the site cannot be considered ‘normal supply’. In addition there are constraints relating to contamination and landfill. It is not clear why the site is included in the plan.

#### Item Question
Council Responses

**13 13 Council Response**

Solutia land is controlled by the company and will only be released for purposes that will benefit or complement Solutia. Therefore this is a more specialist area of development. Removing this allocation from the Plan would potentially stifle growth for a successful Newport company. NCC recently approved an expansion to this site which served to safeguard the site’s future. The scheme was partly WG funded. Similar future requests are likely and the Council needs to be in a position to retain this key employer and enable it to grow.

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### Representation Details

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Document: p.81
Policy: EM02.02

Summary: Question delivery of Llanwern Tipping Area

#### Item Question
Representation Text

**11 11 Representation**

Policy EM2 Llanwern Tipping Area (122ha) – A ‘very much long term opportunity’ with no realistic opportunity for being developed in the short time and is likely to come forward at the very end/outside the plan period. Viability is a major issue. There does not appear to be any evidence to support the inclusion of this site in the plan.

#### Item Question
Council Responses

**13 13 Council Response**

EM2 sites wouldn’t necessarily be ‘new employment land’. Llanwern Former Tipping Area already has industry located on it. The area is considered to detract from the local environment and therefore in need of regeneration. Therefore regeneration proposals which come forward would not be generating net additional employment land. They would be replacing what’s already there with more modern business facilities which would regenerate the area. Llanwern Tipping Area is controlled by Tata Steel. They want the site to remain as a regeneration site as they have intention to develop (indeed, they submitted a rep seeking the enlargement of this allocation). Newport has a growth strategy therefore we feel it should remain in the Plan.
Number: 244.L9//EM04

Representor: Welsh Assembly Government

Document, p.84
Policy: EM04
Summary: Wording of policy EM4 is queried

**Item Question**

Employment - Safeguarding

Sites protected through Policy EM4 should be shown on the proposals map which is currently not the case. This is confusing and does not aid the clarity of the plan. LDP Wales (paragraph 2.2.4) states that policies that have a spatial component in the plan should be defined on the proposals map. The wording of Policy EM4 is not properly constructed to achieve the outcomes required. It is unclear what sites the policy applies to, the aims of the policy, or how it will be implemented. In this case the reasoned justification is more helpful than the policy itself. To monitor Policy EM4, a new Employment Land SPG will be required. The purpose of the SPG will be to help define the role of Newport’s existing stock, including a hierarchy of priorities, and will outline the level of evidence the Council will expect to support planning applications in employment areas. The SPG will protect some sites more strongly than others. This new SPG is noted as being of a high priority 2014B2015. It is unclear how policy EM4 can be properly implemented in the absence of this key evidence. This policy, in the absence of this work does not create certainty to applicants or developers. Policy EM2 [this should read ‘EM3’] Newport Docks. It is unclear why a separate policy is required, and why it can not be included as part of Policy EM4. The particular issues, characteristics and priorities for the site could be noted within the SPG. It is also unclear why water has been included as part of this allocation. It would be helpful if the authority could explain the reason for this approach given the total area has massively increased from the UDP.

**Council Responses**

Following submission of the LDP to the Welsh Government, the Planning Policy Team intends to draft a number of SPGs. An Employment Land SPG will be one of these. Therefore it is intended that this document will be available for inspection during examination of the Plan. Newport Docks. It was a recommendation within the ELR to include a separate policy relating to Newport Docks. The separate policy is designed to promote development that is complementary and does not hinder the operational use of the port. The land area will be amended to remove the water as a factual correction.
### Representation Details

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**Document:** p.28  
**Policy:** SP13  
**Summary:** Clarification sought with regard to Community Infrastructure Levy

### Item Question  
**Representation Text**

1. **ii) Delivery**  
   Community Infrastructure Levy (CIL) & S106  
   The Council has prepared a new Delivery and Implementation Paper. The paper includes information on constraints and phasing, in addition to funding sources and the stakeholders responsible for delivery. This additional work is supported. The Council should be certain that without a CIL charge in place, the required infrastructure is not beyond the tests set out in the CIL Regulations (R122). We note that the authority intend to adopt a CIL charge. Policy SP13: Planning Obligations does not indicate any timescales for its preparation. It would not be prudent at this point in time to pre-empt a CIL charge due to the necessity to demonstrate there is a funding gap initially, which provides the rationale for a CIL charge. The essential point is to ensure there is no ‘double charging’. The supporting text (paragraph 2.44) notes that contributions will be set out through variety of means including S106 and CIL. This is confusing for potential applicants given that a CIL charge is not yet in place. The wording here should be more explicit. The implications for development arising from an inability to ‘pool’ future S106 agreements after 6th April 2013 (CIL Regulation 123) and any CIL charging schedule preparation timetable should also be considered. All other S106 agreements should accord with Circular 13/07. The policy needs to reflect this approach.

### Council Responses

1. **Council Response**
   The Council is aware that the CIL Regulations will impose restrictions on pooling financial contributions. Therefore prior to the adoption of CIL and any pooling restrictions the Council will ensure that site specific Section 106 agreements are used in order to secure infrastructure necessary to deliver the development.
   
   The Plan will not provide a timescale for CIL due to the possibility of change. For information, adoption is anticipated at the end of December 2014.
   
   Based upon historical Section 106 contributions and the draft Infrastructure Delivery Plan, there is an extremely high likelihood that a funding gap exists.
   
   The phrase, ‘(once in place)’ will be added to the planning obligations policy in order to provide clarity to the reader.
   
   It is considered inappropriate for the LDP to repeat regulations and legislation. Therefore the glossary will be amended to add reference to the Welsh Office Circular to provide clarity. The following wording will be added to the glossary:
   “Welsh Office Circular 13/97: The Circular sets out the statutory framework and policy guidance to local planning authorities and developers on the use of Planning Obligations.”
Policy SP13 – Planning Obligations is silent in respect of the types of planning obligations that may be sought from development through S106 agreements and the general priorities for development in the plan. Where funding for related infrastructure is to be sought through planning obligations, the plan should specify the Council’s priorities in broad terms to inform the provision of infrastructure/mitigation and avoid a scheme development being unviable. For example, it is not clear how affordable housing relates to, or how it will be prioritised. As worded the policy is not sufficiently detailed and would not create certainty to applicants/developers. The policy is also silent in terms of how viability will be taken into account when assessing planning obligations. The Authority would benefit from looking at similar policies in other adopted LDPs in order to improve both the content and the clarity of this policy.

The Council does not have priority infrastructure lists (As noted in Planning Obligations SPG)

You cannot have a priority list; every Section 106 agreement/obligation is ‘site-specific’ i.e. it provides specific infrastructure to mitigate impact of development. Once CIL is in place, Members will need to make a decision with regard to CIL expenditure and priority schemes. The following sentence will be added to paragraph 2.44 to clarify the Council’s position: “If development sites are proven to be unviable the Council will need to decide what the Section 106 priorities are on a site by site basis.”

Affordable housing is not considered alongside other infrastructure items. Viability assessment determines the level of affordable housing, site mitigation needs determine infrastructure items. The Community Infrastructure Levy Charging Schedule will be set at a financially viable level, following a Viability Assessment and consequent adoption following Examination. The methodology used to implement SP13 – Planning Obligations, will be set out in the Planning Obligations Supplementary Planning Guidance (SPG). The currently adopted Planning Obligations SPG addresses the issue of financial viability and the approach the Council will take in negotiating S106 agreements. The re-adoption of the Planning Obligations SPG is noted as a high priority in Chapter 14 of the Revised Deposit LDP.
Representation Details

by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M

Rep’n/Para/Policy  Agent  Accession No  Date Lodged  Late?  Source  Type  Mode  Status  Status Modified

244.L12//H17  Welsh Assembly Government  31/07/2013  E  C  M

Document:, p.76
Policy: H17

Summary: Clarification required on delivery of Gypsy and Traveller Sites

Item Question  Representation Text
11  Gypsy and Traveller Sites

Land is allocated in the plan to meet the identified need of 43 permanent pitches and 7 transit pitches. It should be clearly demonstrated that the sites can accommodate the identified pitch need within the plan period. Two permanent sites have been allocated, in addition to a contingency site. The Delivery and Implementation Paper (pages 92-28) highlight planning considerations, infrastructure requirements and the constraints for all identified sites. The authority should demonstrate that the sites can be delivered in the plan period in relation to the identified constraints. Reference is also made to £1.75 million Welsh Government funding available to all local authorities in Wales. The authority should clarify to what extent the deliverability of these sites are reliant on Welsh Government funding, and in the absence of such funding, what are the implications for deliverability of the sites.

Item Question  Council Responses
13  Council Response

NB the LDP includes:

1x permanent residential site for 43 pitches (3 families)
1x transit site for 7 pitches
1x contingency site (can accommodate 7 pitches)

Indicative site layouts have been prepared which confirm that the Gypsy/Traveller sites can accommodate the required number of pitches. 23 permanent residential pitches are estimated to be required up to 2016, with a further 20 required from 2016 to 2026. The delivery rate of pitches is considered to be realistic. This information can be noted in the Background Paper if considered helpful.

7 pitches are required on the transit site (immediate need).

Following the introduction of the Housing Bill, Newport will have to ensure it provides G&T sites. Therefore if funding cannot be secured from Welsh Government, alternative funding will have to be found. Funding would therefore be a corporate matter.
### Representation Details

**Document:** p.121
**Policy:** Monitoring Framework
**Summary:** Suggestions to improve the Monitoring Framework (Housing)

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<td>11</td>
<td>ii) Monitoring</td>
<td>The mechanisms for implementation and monitoring need to be sufficiently clear and sensitive to provide an early alert to avoid non-delivery. An appropriately transparent and comprehensive monitoring framework should be an integral part of an LDP. The LDP monitoring framework (Chapter 12) has shortcomings regarding ranges and trigger points. The framework would benefit from the identification of specific local targets and triggers that reflect the desired achievement of the plan’s strategy, both numerically over the plan period and spatially across the authority. Some examples: Housing (OB4 MT4, OB3 MT5) - Many indicators in relation to housing have trigger points every five years. This is ambiguous. More frequent timescales should be included in the targets to ensure that a review could be triggered if sites are not coming forward as anticipated. The monitoring framework for affordable housing could include an indicator relating to the affordable housing thresholds in the plan. Below is an extract from Pembrokeshire County Council’s monitoring framework. The authority may find it useful to adopt a similar approach tailored to their area. 1. Affordable Housing percentage target in GN.29. Target will reflect economic circumstances. If average house prices increase by 5% above the base price of 2012 levels sustained over 2 quarters then the authority will consider other triggers identified in the Affordable Housing SPG and may conduct additional viability testing and modify the targets established in GN.28 and GN.29.</td>
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<td>The Monitoring Framework has been prepared to establish a measurable set of indicators that are practical and clear in terms of the data to be collected and the methodology used to assess performance. The Indicators are directly linked to the Plan's objectives which flow from the Plan’s overall Strategy. The Framework and its core and local indicators, and associated targets are therefore considered to reflect and assess the desired achievements of the Plan’s Strategy. Housing is monitored annually as part of the Joint Housing Land Availability Study process. It is considered that it would not be appropriate to reduce the trigger rate of 5 years due to the sensitivities of the housing market. Reduced monitoring timescales would mean that the trigger would react to short term influences which may be rectified in the following year. A longer term view would also allow the strategy to be implemented and engaged allowing a more realistic analysis of the data so as not to prejudice a sensitive makers which may over or under supply due to various matters which may not be the fault of the strategy or implementation of the policies of the plan. The local target to monitor the affordable housing threshold within the Plan was considered. However, after consideration of the Pembrokeshire trigger it is considered that although there is clear merit in reflecting economic matters, the provision for Newport is left to Housing Proposals and Windfall Sites based on site by site viability and monitoring should be based on the success of meeting the 30% target.</td>
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Representation Details

Document: Revised LDP, p.121
Policy: Monitoring Framework

Summary: Suggestions to improve Monitoring Framework (Density)

**Item Question**

Density (OB4 MT6) - Policy H3 as worded does not include a reference to a specific density. However, the monitoring target in this respect refers to a figure of 34 dwellings per hectare. In addition, six of the nine new housing allocations have average densities 26 dph. It would be helpful if the authority could clarify this approach.

**Council Response**

The plan is not prescriptive in setting out a required density for all development. All housing commitments, plus the 9 allocations average out to 30 dph. Therefore 34 was an error and 30 dph will now be used. This is a factual correction of an error.

Summary: Suggestions to improve Monitoring Framework (Employment)

**Item Question**

Employment (OB3 MT1) - The monitoring target for employment does not correlate with the employment requirement. The target for annual take up is 1.4ha of employment land per annum equating to 21ha (plan total 35ha). This needs further clarification.

**Council Response**

Employment (OB3 MT1) – The monitoring target correlates with the minimum requirement of 21.5 ha noted in paragraph 2.62. The Monitoring Target will be updated to state: annual take up of 1.4ha of net additional employment land to meet minimum Plan requirement.
### Representation Details

**Document:** Revised LDP, p.65  
**Policy:** H01  
**Summary:** Clarification regarding housing provision/affordable housing target

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<tbody>
<tr>
<td>11</td>
<td>Category D. Matters relating to clarity of the plan generally which may be of assistance to your authority and to the Inspector in considering suitable changes. i) Housing Provision / Affordable Housing Target Housing Tables - Chapter 5. It is unclear from the tables if the affordable housing units (agreed and estimated) relate to the total site capacity, or remaining units that will come forward in the plan period. This should be clarified along with potential impacts on the overall affordable housing target. It is not clear whether the completions to date (01/04/11-30/09/12) have been correctly calculated. The table on page 67 notes that large site completions in the plan period total 330 units. In addition, Para 5.9 states that 45 small site completions have occurred in the plan period to date. This results in a total completion figure of 375 units. The total completions figure in the overarching supply table on page 64 states that completions are 563 units. It would be helpful if the Council could clarify the correct figure in this respect, and where this anomaly would result in a reduction of 188 units from the total housing provision of 11,622 units.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Item Question</th>
<th>Council Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>13</td>
<td>Agree to amend and update housing tables as requested.</td>
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**Representative Details**

by: (No grouping)

Filtered to show: (all of) Stage=L; Status=M

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**Document:** Revised LDP, p.6

**Policy:** Intro & Overview

**Summary:** Consider whether excessive number of policies in the Plan is required

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<tbody>
<tr>
<td>11</td>
<td>ii) Policy Wording</td>
<td>The authority should consider whether the excessive number of policies in the plan is required, or whether they are adequately dealt with in National Planning Policy. The current format of the plan including the vast array of policies is a 'belt and braces' approach. The examination is an opportunity to address this matter.</td>
</tr>
</tbody>
</table>

**Council Responses**

<table>
<thead>
<tr>
<th>Item</th>
<th>Question</th>
<th>Representation Text</th>
</tr>
</thead>
<tbody>
<tr>
<td>13</td>
<td>Council Response</td>
<td>The current format and number of policies within the Plan are not considered to be a flaw of the Plan. It is agreed that the Examination offers an opportunity to discuss this point in more detail. The Plan needs to balance being succinct with providing the Council with a robust framework for making development-management decisions and providing certainty for developers and investors.</td>
</tr>
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**244.L18//M01**

**Representative Text**

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**Document:** Revised LDP, p.114

**Policy:** M01

**Summary:** Policy M1 should clearly articulate the overriding reasons for allowing development in areas of mineral safeguarding

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<tbody>
<tr>
<td>11</td>
<td>i) Minerals</td>
<td>Policy M1 ‘Safeguarding of Mineral Resource’ – As stated in our Deposit representation, Policy M1 should clearly articulate the overriding reasons for allowing development in areas of mineral safeguarding. The authority may find it beneficial to look at Torfaen’s or Blaenau Gwent’s policy on mineral safeguarding.</td>
</tr>
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**Council Responses**

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<thead>
<tr>
<th>Item</th>
<th>Question</th>
<th>Representation Text</th>
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<tbody>
<tr>
<td>13</td>
<td>Council Response</td>
<td>It is considered that the reasoning behind allowing development is set out in the adjoining text which is taken from National Mineral Planning Policy.</td>
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</table>
**Representation Details**

**by:** (No grouping)

Filtered to show: (all of) Stage=L; Status=M

**Rep'n/Para/Policy** | **Representor** | **Agent** | **Accession No** | **Date Lodged** | **Late?** | **Source** | **Type** | **Mode** | **Status** | **Status Modified**
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244.L19/M02 | Welsh Assembly Government | | | 31/07/2013 | | E | O | M

**Document:** Revised LDP, p.115

**Policy:** M02

**Summary:** Policy M2 should be worded more positively to facilitate mineral development to address the unmet need.

**Item Question** | **Representation Text**
--- | ---
11 11 | *Representation*

Policy M2 ‘Mineral Development’ – should be worded positively to facilitate mineral development to address the unmet need. It is unclear what the purpose of Criteria i) is as the evidence of need is already established and set out in the RTS.

---

**Item Question** | **Council Responses**
--- | ---
13 13 | *Council Response*

It is considered that the policy allows development in appropriate locations. It is worth noting that there is limited prospect of mineral workings in Newport due to the limited supply and industry interest. The level of need may change during the plan period so the investigation of need, especially at the local level, would assist in the future planning of mineral supply in Newport which is well documented at the National and Regional levels.

---

**Representation Details**

**by:** (No grouping)

Filtered to show: (all of) Stage=L; Status=M

**Rep'n/Para/Policy** | **Representor** | **Agent** | **Accession No** | **Date Lodged** | **Late?** | **Source** | **Type** | **Mode** | **Status** | **Status Modified**
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244.L20/M03 | Welsh Assembly Government | | | 31/07/2013 | | E | C | M

**Document:** Revised LDP, p.116

**Policy:** M03

**Summary:** BGS Resource Mapping should be considered - unclear why this policy is included in the Plan

**Item Question** | **Representation Text**
--- | ---
11 11 | *Representation*

Policy M3 Oil and Gas - The BGS Resource Mapping should be considered to see if there are any resources which may harbour the potential for natural gas. Paragraphs 10.11 of the Revised Deposit Plan states that there are no known mineral energy sources (oil, gas or coal) within Newport. It is therefore unclear why this policy is included in the plan.

---

**Item Question** | **Council Responses**
--- | ---
13 13 | *Council Response*

The British Geological Surveys maps do not show oil and gas resources. There have over the years been applications for exploration of potential resources, therefore it is considered that the policy is required. Moreover, technologies are likely to change or new issues arise during the Plan period, such as fracking. Deleting this policy would leave the Council without any policy against which to consider such proposals.

---

12/02/2014
iv) Environmental Spaces (Policy CE4) - We do not object in principle with the policy. However, it is not clear why identifying all of the spaces shown on the proposals map is necessary. PPW (paragraph 11.2.3) states that the development plan should protect playing fields and open spaces that have significant amenity or recreational value to local communities. Some of the spaces identified in the plan are small green verges situated near roads and or land in residential areas. Other spaces are protected under other policies or designations such as historic landscapes and parks, conservation areas and archaeologically sensitive areas etc. It is difficult to see how many of these spaces would be subject to development pressure due to their size and location, and in some cases whether they require a separate level of protection over and above existing designations. It would be helpful if the Council could clarify the approach taken in respect of this policy.

The approach taken by the Council in identifying Environmental Spaces is set out in the Environmental Spaces Background Paper. In order to establish a consistent approach throughout Newport, the starting point was identifying environmental and recreational land in Newport, including SINC's, Ancient Woodlands, play areas and Accessible Natural Greenspace. The methodology used has been designed to provide a consistent and transparent approach. Small sites located in residential areas may potentially be more vulnerable to development pressure and may also be of importance to the amenity of the area, particularly in high density areas with few green spaces. Sites with more than one designation are not considered to be a problem and do not justify a change to the Plan. The Environmental Spaces policy, whilst seeking to protect land from development, also seeks to identify Newport’s Green Infrastructure provision.
<table>
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<tr>
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</table>

Document: Revised LDP, p.71
Policy: H05
Summary: Removed gypsy/traveller sites from Affordable Rural Exceptions

**Item Question Representation Text**

11 11 Representation

v) Gypsy and Travellers

Policy H5: Affordable Housing Rural Exceptions (Para 5.15) - The reference to "Gypsy and Traveller accommodation" should be removed. If the Authority considers it necessary to have a Gypsy and Traveller rural exception site policy, this should be included as a separate policy (paragraphs 28 & 29, Circular 30/2007, 'Planning for Gypsy and Traveller sites). It is not appropriate to conflate this with affordable housing requirements.

**Item Question Council Responses**

13 13 Council Response

WG Circular 30/2007 notes that the application for a G&T rural exception site can be provided in the same manner as a general affordable housing exception site. Therefore we do not necessarily see the need for a separate policy which would say exactly the same thing.

---

| 244.L23//H15     | Welsh Assembly Government |       |              | 31/07/2013  | E     | O      | M    |      |        |                 |

Document: Revised LDP, p.75
Policy: H15
Summary: Para 5.30 should not include operational management arrangements for gypsy/traveller sites in the LDP

**Item Question Representation Text**

11 11 Representation

Policy H15 Gypsy and Traveller Transit Accommodation - Paragraph 5.30 sets out the operational management arrangements for the policy. This is not appropriate content for an LDP.

**Item Question Council Responses**

13 13 Council Response

Accepted – this will be removed, despite being something frequently raised during public consultation.

12/02/2014
### Representation Details

**Document:** Revised LDP, p.19  
**Policy:** SP03  
**Summary:** Minor typing correction

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<tr>
<td>11</td>
<td>vi)</td>
<td>Flood Risk (Policy SP3) - A full stop should be inserted after “in accordance with national guidance” in order that the policy accords with guidance in TAN 15. In addition references to TAN 15 should refer to 2004, not 2014.</td>
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**Representation Details**

**Document:** Rev LDP, p.76  
**Policy:** H16  
**Summary:** Amend para 5.32 to remove reference to local connection

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<td>11</td>
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<td>Policy H16 Gypsy and Traveller Residential Accommodation. Paragraph 5.32 refers to the requirement that applicants have to demonstrate a local connection and no other place to live. This statement does not comply with WG Circular 30/2007 and Section 225 of the Housing Act 2004.</td>
</tr>
</tbody>
</table>

---

**Council Response**

Agree to amend paragraph 5.32 to read:

Permanent residential accommodation will be provided to those families and individuals that have no alternative place to live (this assessment is carried out by Housing Services).

---

**Representation Details**

**Document:** Rev LDP, p.19  
**Policy:** SP03  
**Summary:** Minor typing correction

<table>
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</tr>
</tbody>
</table>

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**Council Response**

Agree to add a full stop in the suggested place and check the correct date is noted for TAN 15.
Item Question  Representation Text

11 vii) Waste - Objective 10: Waste – The revised Waste Framework Directive requires the proximity principle to be applied to Mixed Municipal Waste, not all types of waste. The words “where appropriate” should be added after “proximity principle” in order to comply with the revised Directive.

The Waste Background Paper identifies the WG Clarification Letter CL-01-12 (1st November 2012). However, the content of this letter has not been reflected in the supporting text of the Waste Chapter as the Waste Plan also comprises Towards Zero Waste, and the CIMS Sector Plan which are not referenced. LDP, paragraph 11.6 – The sentence “the need for future waste facilities will be assessed against the SEWRWP” as CL-01-12 identifies that the SEWRWP does not reflect the more up to date waste arising predictions set out in the CIMS Sector Plan, which is based on tonnages and not land take.

Item Question  Council Responses

13 13 Council Response

Agree to add words “where appropriate” after “proximity principle” in Objective 10.

It is noted that Welsh Government Clarification Letter (Ref CL-01-12) sets out a move to using the Collections, Infrastructure and Markets Sector Plans (CIMS Plan) – July 2012) as an updated position on the assessments contained in the RWP 1st Review. However, the Clarification Letter also notes in page 3 “in the interim, the land take ranges can be considered to provide a valuable spatial basis for implementing the broad principles of the CIMS plan and should continue to be used by local planning authorities in the preparation of LDPs, in order to facilitate the provision of a wide ranging and diverse waste and resource management infrastructure”.

Paragraph 11.6 is considered to be in accordance with this guidance. Reference to “subsequent studies that are agreed by the Council to give an accurate assessment of land take requirements” also allows for more up to date studies to replace the RWP 1st Review requirements.

Reference to Towards Zero Waste One Wales: One Planet (June 2010) and the Collections, Infrastructure and Markets Sector plans (CIMS Plan) July 2012 will be added to paragraph 11.5.
### Representation Details

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**Document: Revised LDP, p.39**

**Policy: GP01**

**Summary: Suggestion to improve policy wording**

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<tr>
<td>viii) Climate Change – (Policy GP1)</td>
<td>B The wording of the policy is unclear and appears to contradict itself. The clarity of the policy could be improved as follows: i) Be designated to withstand the predicted changes in the local climate and to reduce the risk of flooding on site and elsewhere by demonstrating where appropriate that the risks and consequences of flooding can be acceptably managed, including avoiding the use of non-permeable hard surfaces; In addition, paragraph 3.7 should be amended to include reference to the Council’s role as Lead Local Flood Authority as follows “Developments will therefore only be permitted where the Council, as the local flood authority is satisfied that...”</td>
</tr>
</tbody>
</table>

**Council Response**

Policy GP1 criterion i) has been amended as proposed. The Council has a range of responsibilities and as such the specification of its role as Lead Local flood authority is not deemed necessary within paragraph 3.7.

---

| Document: Revised LDP, p.62, para.4.55 | Welsh Assembly Government | 31/07/2013 | ☑ | E | O | M |

**Policy: CE11**

**Summary: The new provision in the GPDO should be acknowledged**

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<td>ix) Renewable Energy (Solar Panels) - Paragraph 4.55 – Solar Panels (up to 50MW) on non-domestic buildings are now permitted development. The new provisions in the GPDO should be acknowledged.</td>
<td></td>
</tr>
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</table>

**Council Response**

Solar Panels (up to 50MW) on non-domestic buildings are now permitted development. Subject to conditions, under part 43 of the GPDO. The text at paragraph 4.55 of the LDP will be changed to reflect the change in legislation.
### Representation Details

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**Document:** Revised LDP, p.144  
**Policy:** Glossary  
**Summary:** All references to Environment Agency should be amended to NRW

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**Representation Text**

x) Stakeholder References - All references to the Environment Agency (EA) should be amended to Natural Resources Wales (NRW). There are some instances in the plan where this had not been updated.

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**Council Responses**

Agree to amend Plan to refer to Natural Resources Wales.

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<th>Representation Text</th>
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<td>11 11</td>
<td>Continues to support the inclusion of Caerleon train station.</td>
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**Summary:** Supports the inclusion of the railway station in Caerleon

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**Council Responses**

Support noted.

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12/02/2014  
Page 203 of 1581
<table>
<thead>
<tr>
<th>Rep’n/Para/Policy</th>
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Document: Revised LDP, p.81
Policy: EM02
Summary: Support regeneration of Old Town Dock and Friars Walk City Centre scheme

---

**Representation Details**

**Item Question**

11 Representation

I support the increase in land available for regeneration of Old Town Dock/George Street/Penmaen Wharf and the inclusion of the Friars Walk City Centre scheme.

---

**Council Responses**

13 Council Response

Support noted.

---
Newport City Council Local Development Plan

Representation Details

by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M
Rep'n/Para/Policy Representer Agent Accession No Date Lodged Late? Source Type Mode Status Status Modified

320.L1/T05 Newbridge Construction Boyer Planning - Cardiff 26/07/2013 P O I M

Additional material submitted - Please click here

Document: Revised LDP, p.89
Policy: T05
Summary: Long distance walkway should be deleted from H1 (12) Former Tredegar Park Golf Course.

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<td>A new paragraph or new text</td>
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<td>11 11</td>
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1.0 Introduction

1.1 Newbridge Construction Ltd objects to the proposed alignment of the long distance walking and cycleway as contained within the former Tredegar Park Golf Course.

1.2 The proposed alignment of the walking and cycleway, both through and to the northeast of the Housing Allocation H1(12) - Former Tredegar Park Golf Course are restrictive and subject to land ownership and existing use concerns. The proposed alignments are therefore contrary to the following tests of soundness:
- CE2 in that the proposed alignment is not realistic or appropriate and is not founded on a robust and credible evidence base; and
- CE4 in that continuing with the alignment as per the Proposals Map it does not provide a reasonable level of flexibility to allow the Deposit Plan to deal with future residential design and land ownership issues.

2.0 Amplification

2.1 Whilst the proposed routes of the long distance walking and cycleway are not prescriptive it is important to highlight there are concerns relating to the principle of the routes through both the Housing Allocation H1(12) and the Whitehead sports and recreation ground.

2.2 The routes shown do not seem to take account of the existing planning permissions at the Tredegar Park Golf Course site or the fact that the north-eastern alignment would cross directly over the existing bowling green.

2.3 Given that the wider surrounding area within the Former Tredegar Park boundary is proposed to provide open space and sports fields, outside of the residential development area, it is considered that the alignment would be better placed elsewhere on site.

2.4 The provision of the route running directly through the housing allocation area is deemed as unduly restrictive and has the potential to influence future layouts and does not allow flexibility at that point.

2.5 Furthermore there is no indication as to why the current route has been suggested and there seems little evidence base to justify the proposed alignment.

3.0 Required Change

3.1 That the long distance walk and cycleway be removed from with the housing allocation site at H1(12) as at present no detailed layout plans are provided and the introduction of this route will have a restrictive impact upon the future development of the site.

3.2 Furthermore that the alignment of the walk and cycleway to the northeast of the should be amended as firstly it does not accord with the extent of residential development as approved under Appeal APP/G6935/A/05/1193193 and subsequently Planning Permission 09/0096 (as per separate submissions) and secondly currently passes directly through existing Whitehead Sports/Recreation Ground.

12/02/2014
<table>
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<th>Rep'n/Para/P Policy</th>
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<td>Due to the significant issues raised in the attached representations.</td>
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**Item Question**

Council Response: No change is needed. Policy states that the routes are marked indicatively and may change. Therefore the routes can be flexible to take into account the layout of future development.
### Representation Details

**Newport City Council Local Development Plan**

**Filtering Criteria:**
- Rep'n/Para/Policy: (all of) Stage=L
- Status: M
- No grouping

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**Additional material submitted**

**Document:** Revised LDP, p.22

**Policy:** SP08

**Summary:** Remove Tredegar Park Golf Course from the SLA.

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1.0 Introduction

1.1 Newbridge Construction Ltd objects to the inclusion of land at The Former Tredegar Park Golf Course within the Tredegar Park Special Landscape Area designation. The land concerned is shown on the attached plan.

1.2 Inclusion of this land within the Tredegar park Special Landscape Area results in the Deposit Local Development Plan being unsound in terms of the following test:

- CE1 the proposed Special Landscape Areas do not provide a coherent approach to designation;
- CE2 in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base; and
- CE4 in that the Special Landscape Area does not provide a reasonable level of flexibility to allow the plan to deal with future circumstances.

2.0 Amplification

2.1 LANDMAP Designation

Firstly the use of the LANDMAP information system in determining potential SLAs within Newport is driven by Planning Policy Wales (2012 5th Ed) in which Paragraph 5.3.12 states that LANDMAP can help to inform supplementary planning guidance on landscape assessment (covering for example, local distinctiveness, special landscape areas and design).

However, in reviewing the SLA Background Paper it is evident that the LANDMAP data appears to have been the main justification for the recommended location, extent and boundaries of the proposed SLAs. Whilst Planning Policy Wales states that the data should 'help to inform' supplementary planning guidance, in the case of the proposed Newport SLAs the Authority have relied upon the data rather than be informed by it.

In considering the above it is questioned as to whether all landscapes within the proposed designated areas are worthy of equal protection. One of the strategic criteria and tests for SLA designation stated in LANDMAP Information Guidance Note 1 is coherence. This is taken to mean that the boundaries of proposed SLAs should contain within them landscapes of a distinctive unit exhibiting characteristics worthy of protection by virtue of their special qualities, distinctive features or rarity. It is therefore unclear as to how the test for coherence, as required in the guidance, can be satisfied across the relatively large land areas covered by the SLAs.

Concern is also raised in relation to the definition of boundaries. The TACP Report - Designation of Special Landscape Area (2009), which is appended to the Background Paper, highlighted the need for the subsequent confirmation of the detailed boundaries by the Authority.

In this regard paragraph 5.2 of the SLA Background Paper states that "The proposed SLA boundaries for the LDP are justified as being located either: along Newport Authority's administrative boundary, the proposed settlement boundary from the LDP or along structures, such as motorways, railways, rivers or canals, the edges of large woodlands or hedgerows. This ensures a consistent and clearly defined boundary line which will ensure future use of the allocation is unambiguous".

However, whilst some further work has been undertaken it is evident that in order to provide a consistent approach the Authority have in the majority of cases, not had regard to landscape quality and adjoining influences.

We consider that far more scrutiny of SLA boundaries is needed to exclude those landscapes that lack special qualities, distinctive features or rarity, and to re-draw the boundaries so as to include only those landscapes worthy of protection by virtue of their special status.

3.0 Special Landscape Area Boundary

3.1 Given the above comments on the LANDMAP assessment and subsequent definition of the boundaries proposed by the Authority it is also important to highlight that the site at former Tredegar Park Golf Course is degraded and lacks and special quality and is heavily influenced by the physical infrastructure of the previous golf course. It is therefore evident that the site is subject to urban and human influences.

3.2 Therefore the characteristics of the site and surrounding environment have an impact upon the site and its inclusion within the designated Tredegar Park Special Landscape Area.
3.3 It is unclear whether all landscapes within the proposed designated area are worthy of equal protection, given that it realities mainly to Tredegar Park House and that a more detailed assessment of the boundaries should be undertaken rather than default to cover all land in close proximity to the important Tredegar House area.

4.0 Required Change:
4.1 That the site at former Tredegar Park Golf Course be removed from the Tredgar Park Special Landscape Area.

Due to the significant issues raised in the attached representations.

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No change. The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within Natural Resources Wales’ guidance. Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area scored highly enough, as part of the Landmap assessment process, and because of this the area has been included as Special Landscape Area in the Revised Deposit Local Development Plan.
### Representation Details

**Document:** Revised LDP, p.65  
**Policy:** H01.12  
**Summary:** The site area noted for H1(12) former Tredegar Park Golf Course is incorrect.

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#### 1.0 Introduction
1.1 Whilst Newbridge Construction Ltd support the principle of residential development at the Former Tredegar Park Golf Course Site concern is raised in relation to the site allocation area of H1(12) as it does not properly reflect the area approved for residential development as per the existing planning consents approved under Appeal APP/G6935/A/05/1193193 and subsequently Planning Permission 09/0096. The correct extent of the extent of the land concerned is shown on the attached plan.

#### 2.0 Site Boundary
2.1 It is positive to note that previous concern regarding the site boundary at the Tredegar Park Golf Course Housing Allocation H1(12) has been amended to properly reflect the extent of residential development as approved by the initial Appeal APP/G6935/A/05/1193193 and subsequently Planning Permission 09/0096.

2.2 However, the revised Deposit Plan proposes a housing allocation of 5.2ha, whereas the Appeal Inspectors Report (2006) Paragraph 22 describes the proposal as providing 6.4ha of residential land. Given the Inspector has stated that the residential area is at 6.4 ha then this figure should be given as a minimum within the proposed policy in order to allow future flexibility to deal with housing needs.

2.3 The reduction in the site is not only without appropriate evidence but also does not provide a reasonable level of flexibility to allow the Deposit Plan to deal with a higher housing requirement to meet local needs.

2.4 This is particularly relevant as it noted that due to concerns over deliverability of some of the other proposed allocated sites the housing land supply is inadequate to meet the identified 10,350 dwellings.

2.5 Within Tredegar Park Golf Course there exists capacity and space to increase the allocated housing numbers which would be immediately available and within a sustainable location. It is suggested that the allocation be increased to 200 dwellings.

#### 3.0 Required Change
3.1 That the Deposit Plan be amended to reflect the approved residential area of 6.4 hectares as a minimum.

3.2 That the housing allocation number be increased to 200 dwellings to reflect the site area and provide improvements to the housing land supply.

#### Speaking at Public Examination
Due to the significant issues raised in the attached representations.

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12/02/2014
Support noted. The number of units anticipated on the scheme reflects the most up to date permission on the site, which currently stands at 150 units. It is not appropriate for the LDP to amend the unit numbers on the site because such an increase would require a detailed assessment which is not deemed necessary at this time. Amendments to the approved permission should be undertaken at the development management scale. The Appeal Inspector's Report for Appeal (APP/G6935/A/05/1193193) notes in paragraph 22 that the site is 6.4ha but that the site is 5.2 hectares net area. Therefore the plan will not be amended to alter the site area which is reflective of the approved developable area of the site.
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Document: Revised LDP, p.65  
Policy: H01  
Summary: Housing land supply is inadequate therefore land at Cwrt Camlas, Rogerstone should be allocated for housing.

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1.0 Introduction

1.1 On behalf of The John Family and Newbridge Estates Ltd, we object to the approach taken by the Deposit LDP towards housing supply.

1.2 In the first instance, we welcome the Council’s acceptance that the housing requirement must be considerably higher than envisaged in the previous Deposit version of the LDP. Indeed this represents a step change in the position at Newport and is important to the future economic and social well being of the City. This inevitably places a far greater emphasis on the delivery of sites for housing otherwise there will be far reaching implications for the City and its residents.

1.3 We are seriously concerned that whilst the requirement has significantly increased, the housing land supply has remained largely the same as within the earlier version of the LDP. Indeed, the strategy remains reliant upon dwellings being provided at sites that are subject to a range of constraints and have historically failed to deliver. PPW (9.2.3) is clear that “sites must be free, or readily freed, from planning, physical and ownership constraints, and economically feasible for development, so as to create and support sustainable communities where people want to live. There must be sufficient sites suitable for the full range of housing types.”

1.4 We do not consider that the supply proposed complies with these fundamental requirements. Indeed, the failure of constrained sites to deliver would have significant consequences on the Local Area. Given that it is the Welsh Minister’s main priority to deliver housing, it is our view that greater emphasis must be placed on ensuring a deliverable and implementable supply of land for housing rather than continued reliance upon sites that have remained undeveloped over successive plan periods.

1.5 Based on our consideration of the Plan in relation to National Policy requirements, it is our view that the proposed Focussed Changes made in relation to the above are contrary to the following tests of soundness:

- CE2 in that the housing strategy is not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales. There is no flexibility to deal with the failure of sites to be brought forward for development;
- CE1 in that the proposed housing provision strategy and employment requirement does not flow logically from the proposed strategy of the plan and are not related to each other;
- CE2 in that the housing supply are not realistic and appropriate having considered the evidence;
- CE4 in that restricting the level of housing available during the plan period does not provide a reasonable level of flexibility to allow the Plan to deal with higher population, employment growth and household growth and to meet local needs.

2.0 Land Supply Analysis

It is our view that there are numerous and significant weaknesses within the housing land supply that go to the heart of the Plan and render it unsound, in summary these are:

Housing Land Supply

In the first instance we draw attention to the under provision of housing during the UDP period (c. 360 dwellings) and secondly to the shortfall to date (April 2011 to April 2012 - 24 months) in the LDP period. Just 12 years into the LDP period based on these matters there is already a cumulative under provision of over 1,100 dwellings. Absent a significant source of readily available land for development it is likely that this level of under provision will increase as the same sites are relied upon for the LDP.

2.3 Given that the housing requirement has significantly increased and there are no material changes to the land supply position. If the 2012 JHLAS were re-run in the basis of the LDP requirement, then the land supply would decrease to less than five years.

Sites subject to constraints

We note that there are a number of sites that are subject to constraints yet are relied upon by the LDP. Indeed, these sites are vital to the delivery of the LDP but have been in the JHLAS for considerable time with no sign of development, some are categorised as 3(i) due to constraints, some are apartments for which there is limited demand and others are simply not viable for development. In addition there are a number of sites which are subject to the signing of a section 106 agreement which has constrained delivery for some time. We do not believe that these sites can be relied upon in order to contribute towards the housing requirement.

2.5 The following sites are examples of the inherent problems within the supply:

Site 1
1. Adjacent to Mcready’s 54
2.6 We have serious concerns over the ability of the Llanwern site to be developed at the level envisaged within the plan (i.e. contributing over 2,748 dwellings during the plan period). Indeed, historically, there have been numerous delays that have continually postponed development and it is plainly not contributing the level envisaged in the latest JHLAS.

2.7 Indeed, we believe that based on present evidence if the overestimation persists, then the site will deliver at least 1,000 dwellings fewer than the level envisaged. This represents a major threat to the soundness of the plan.

Range and Choice
2.8 We note that National Guidance contained within PPW (5th Edition) requires that LDPs to provide a range of and mix of house types in places where people want to live. The present strategy is predicated upon large brownfield sites in and around the city centre and to the east of the City. This fails to consider the smaller scale needs of existing communities around the city and the desire of local people to continue to live within existing communities rather than as part of larger brownfield regeneration schemes in less attractive parts of the City.

Sites subject to s106
2.9 We do not consider that those sites that are subject to s106 can be relied upon to contribute during the plan period.

Windfall Allowance
2.10 There is presently reliance upon a significant number of windfall sites being brought forward. We note however, that a significantly number of the constrained land supply within the various tables are themselves windfall sites that have remained and subsequently become allocated but undeveloped. Accordingly, we believe that caution must be exercised in the contribution that such sites will make.

Flexibility allowance
2.11 Given the fundamental problems with the land supply identified and shortfall that it will result in, it is of fundamental importance that a flexibility allowance is identified. Indeed, in its present form the strategy lacks any flexibility to deal with the large number of constrained sites not being brought forward.

2.12 It is our view that in light of the significant problems identified, the contingency should be in line with the level of flexibility within the previous version of the LDP.

3.0 Consequences of failing to provide an adequate housing supply

3.1 As noted, the Strategy in its present form lacks any flexibility to deal with the failure of a small number of large sites to come forward. Given the known constraints and historic under-delivery, it is important that the sufficient housing is identified. Indeed, the consequences of the failure of the housing supply to meet requirements will be far reaching and undermine future aspirations for Newport.

3.2 Hardisty Jones Associates (HJA) have prepared an analysis on behalf of The John Family and Newbridge Estates Ltd on the consequences of the failure of the housing land supply to be realised. They have based their considerations on the Assessment of Housing Requirements report prepared by Nathaniel Licfield and Partners for Newport City Council.

3.3 Both the Newport Community Strategy and Local Housing Strategy set out an ambition to see Newport as a prosperous and thriving city. The Revised LDP has a vision of a lively, dynamic, growing City. The delivery of sufficient housing is central to achieving these visions in a sustainable manner, as set out within the LDP and the supporting NLP report (Assessment of Housing Requirements, February 2013, NLP). Indeed, the NLP report makes multiple references to the need to align housing and economic objectives in order to deliver and enable a sustainable and sound LDP, including:

*Alignment of housing and economic policy objectives is essential to ensuring sustainable development and support for growth ………(alternative lower growth scenarios) ……fail to reflect the level of economic growth that is forecast and, as such, would compromise the deliverability of the economic vision for the area" [para 3.22, NLP].

*This consistency between employment and housing policies will be important in ensuring that the Plan can be found to be sound" [para 3.28, NLP].

*To achieve balanced and well-distributed growth in economic policies must align with policies seeking the future development of houses in the area".[para 4.10, NLP]

3.4 Plainly the failure to deliver sufficient housing within Newport over the LDP period has implications for economic, social and environmental sustainability.

Economic Sustainability

3.5 Firstly, there will be a reduction in the scale of economic and employment growth achieved in Newport over the LDP period if lower levels of housing than planned are delivered. Paragraphs 1.18 and 1.27 of the Revised LDP note there is a direct relationship between job creation in the construction sector and the building of houses. Without sufficient activity there will be an impact on the potential to achieve 7,400 jobs over the plan period.

3.6 Secondly, on a more general level, there is an important relationship between the provision of housing, the growth of the workforce and the attraction and achievement of economic growth. As NLP note:

*"….the delivery of sufficient housing for the (expanding) workforce represents an essential element in ensuring that economic growth can be attracted and sustained."[para3.23, NLP]

3.7 Thirdly, and related to the second point above, there will be implications for the sustainable supply of labour without sufficient housing to attract and retain a population of working age. The NLP report highlighted the importance of positive net-migration to provide an appropriate demographic structure to support sustainable growth:

*Migration can be considerable benefit for the social and economic well-being of an area. It helps to ensure that the area benefits from a balanced mix of people of all age groups, including those of working age that are able to work within the local area. As such, it can contribute towards a more balanced and economically functional society. It is important to acknowledge these benefits and to respond to them by making adequate provision for the future needs of migrants, including housing."[para3.8, NLP]

*Taking account of the assumptions that have been made (and tested) regarding unemployment, economic activity and commuting, it is evident that if NCC is to deliver its growth aspirations then it will be essential to plan for and provide for net inward migration".[para 3.9, NLP].

3.8 In order to secure the economic ambitions of the LDP and wider policy and strategy documents for Newport there is a need to deliver sufficient housing.
Social Sustainability

3.9 There are two important elements of social sustainability related to housing provision.

3.10 Firstly, a failure to provide sufficient housing will hinder the formation of new households and/or limit the housing choices available to new households. This can happen in a number of ways. Directly, insufficient housing limits the number of households that can be accommodated in the city. Indirectly, it can lead to increases in house prices as demand outstrips supply, limiting access to housing that affordable. The implications will vary from case to case, but may force homebuyers to look further afield, away from friends and family and with commensurate implications on travel to work (see below), or may lead to households failing to form, for example young people in their twenties and thirties continuing to reside within the parental home. All of these outcomes have social implications and restrict opportunities.

3.11 Secondly, a lower provision of housing will impact upon the level of affordable housing that can be delivered in the city over the plan period. The Newport Community Strategy sets out a need to deliver affordable housing as part of its vision to ensure opportunities for all. This is set against an historic backlog in terms of affordable housing delivery, with the NLP report indicating a "significant unmet housing need in Newport" [para 3.33 bullet 6, NLP].

Environmental Sustainability

3.12 Without an adequate locally resident workforce employers will be reliant upon commuters to fill vacancies. This will put pressure on transport infrastructure and, given the ongoing reliance on the private motor car, is likely to lead to less environmentally sustainable outcomes. The NLP report states that:

".....if the housing requirement was set to reflect the demographic scenarios alone, then there is a risk that the housing and employment elements of the LDP would not be joined up and the economic growth that is anticipated would be reliant upon a substantial increase in commuting into the area, if it was to be achieved. Such an approach would not be sustainable and would raise fundamental questions regarding the soundness of the resultant strategy."[para 4.9, NLP]

3.19 In conclusion therefore it is vital that housing and employment is aligned in policy, and that in addition, housing is delivered in order to enable the sustainable economic growth that is so necessary. Indeed, this similar conclusion is reached by NLP in its advice to the Council:

"Alignment of housing and the economy is therefore essential to ensuring sustainable development and support for growth.....the delivery of sufficient housing for the (expanding) workforce is essential to ensuring that economic growth can be attracted and sustained ..."[para 4.11, NLP]

4.0 Required Change

4.1 It is considered that to make the plan sound additional land will be required to be identified for housing. To that extent the land adjoining Cwrt Camlas is considered acceptable to accommodate some of the required shortfall. It is readily available, free from constraints and related to an existing sustainable community where people want to live.

4.2 The supporting Development Framework Document which has been prepared in relation to the land adjoining Cwrt Camlas has summarised the technical reports and information which has been prepared to support the allocation as a logical choice for housing for approximately 88 dwellings along with 1.1ha of leisure/educational development.

4.3 It is evident from the assessments undertaken as part of the Development Framework Document and the separate submissions made to the Deposit LDP in regards to Policy SP5 - Countryside and H1 - Housing Site (Allocation), that there are no overriding constraints to the development of the site. Furthermore given that the site is without contamination issues and large infrastructure requirements it is immediately available and would assist Newport in providing short term sites to provide for Newport's immediate housing needs as detailed above.

4.4 Taking this into consideration an appropriate masterplan has been prepared as part of the Development Framework Document to illustrate the development opportunities and benefits which can arise and to demonstrate that an allocation at Cwrt Camlas within the settlement of Rogestone is deliverable. In this regard the allocation at land adjoining Cwrt Camlas will assist in providing certainty over deliverability and housing supply within the plan period together with alternative range and choice.

5.0 Conclusion

5.1 In the first instance, we welcome the significant progress taken by Newport Council in recognising that there is a need to establish a significant housing requirement and the benefits that this can bring. However, we believe that the supply in inherently problematic and is not capable of delivering the level of housing required.
5.2 The housing land supply is inadequate to meet the identified 10,350 dwellings. We have a number of significant concerns:
1. There is already a cumulative under provision of housing amounting to over 1,100 houses in the first 18 months of the LDP period and including the shortfall from the UDP;
2. The sites identified as being available during the plan period will not deliver the necessary completions. Many have been around for some considerable time and are subject to constraints that there is no indication can be overcome;
3. The estimation of delivery at Llanwern is significantly overstated when based on historic delays, constraints and progress to date;
4. An element of supply is subject to S106 agreements being signed. Given the already significant delays such sites cannot be robustly considered to be deliverable.
5. There is no flexibility allowance for non-implementation which is likely to be a significant problem.

5.3 It is considered that additional readily available housing sites will be required for development. As such, land adjoining Cwrt Camlas should be allocated for development.

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<td>Speaking at Public Examination</td>
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Due to the significant issues raised in the attached representations.
Support for the growth strategy noted.

Justification of Requirement
Following representations at the Deposit LDP stage the housing requirement figure has been justified and increased from the proposed Welsh Government Population projections. There is scope for an authority to deviate from the WG population projections but this deviation is required to be well evidenced. The NLP assessment sets out this evidence base and illustrates that Newport, as one of the few areas in Wales with an anticipated population increase noted in the Census, is set to grow and reflects the Council’s policy aspiration for growth. It should be recognised that the majority of the sites (46 of 55) have planning permission or have permission subject to a section 106 agreement. There is scope for an allowance to be made for an increase in housing requirements but this deviation is required to be well evidenced. The NLP assessment sets out this evidence base and illustrates that Newport, as one of the few areas in Wales with an anticipated population increase noted in the Census, is set to grow and reflects the Council’s policy aspiration for growth. It should be recognised that the majority of the sites (46 of 55) have planning permission or have permission subject to a section 106 agreement. This established supply with clear market intent illustrates not only that a growth strategy is appropriate but achievable.

As noted above, the Plan identifies its housing requirement for the plan period based on an assessment of need and this is also true of its employment land requirements. The clear strategy for the Plan is for growth and it will be through the successful implementation of the policies of the Plan that this will be achieved. There is a clear link between housing supply and economic growth which is why the supply will be monitored annually.

Reliance on previous Development Plan sites
The Local Development Plan does have a number of housing sites which were identified within the Unitary Development Plan. In total there are 15 of the 55 housing sites which continue into the new plan. The majority of these sites have progressed significantly from the UDP, as noted below:

1. Land adj. McReadys. As of 1st April 2013 the developer is on site preparing the site for development.
2. Eastern Expansion Area. Planning permission has been granted with a signed Section 106 agreement. Gallagher Estates have confirmed through the JHLAS process that they will be delivering units on site in 2015.
3. Glebelands. This site has an extant planning permission associated with the school site adjacent to the residential area. The land has recently been sold to a developer.
4. Monmouthshire Bank Sidings. Redrow are on site and progressing.
5. Traston Lane. The site has planning permission and the agent has confirmed that they anticipate development on the site in 2015.
6. Pirelli. This site has been sold to the Seren Group (RSL) who launched the development in September 2013.
7. Ty Du Works. An application is being considered by the Council for a new scheme on the site.
8. Farmwood Close. This is an historic site with a LDC for the implementation of 10 units which have not been completed. The land is currently being marketed.
9. City Vision. The developer is on site and progressing.
10. Trinity View. The developer is on site and progressing.
11. Glan Llyn. The developer is on site and progressing. A third developer (St Modwen) are anticipating to begin work on Phase 2 in 2015.
12. Mill Street. The site is owned by NCC who will market the site.
13. Herbert Road. This site is adjacent to the Glebeland site noted above. The site is compliant with the overall strategy of the LDP being a brownfield urban site in need of regeneration. There is no application on the site but the area land owner notes their intention to sell the site for development.
14. Whitehead Works. This site is part of a Welsh Government regeneration scheme, which anticipates delivery to begin in 2016.
15. Bideford Road. This site is compliant with the overall strategy of the LDP being a brownfield urban site with potential for regeneration. There is no application on the site but the area is the remaining part of a housing estate development.

The information above clearly shows that although there are a number of sites which have continued from one development plan to the other they have in the main progressed significantly or that they will be delivered within the plan period. It is also important to note that it was made clear through the UDP process that the growth proposed in the east of the city (i.e. Glan Llyn and Llanwern Village) was not anticipated to be delivered wholly within the UDP plan period.

Delivery in the east
Nonetheless the development rate anticipated over the plan period for the large housing development at Glan Llyn, is based on an annual review through the Joint Housing Land Availability Study (JHLAS) as required by National Planning Policy. The rates are considered appropriate and have been jointly agreed with the JHLAS study group which includes the development industry.

The Plan sets out the anticipated rate of delivery in Chapter 13 which illustrates that the total number of units is set to be delivered across the plan period. This in turn is established yearly through the
Deliverability and Supply

The Plan does however provide enough land to ensure that a 5 year supply is met and, that although the annual build rate is higher than currently achieved, even when taking into account the residual method of calculation the Council has provided an adequate supply of land which has been agreed with the industry through the JHLAS process. In terms of Residual need it should be noted that the assessment of residential need takes into account the period 2011-2026. This takes into account the need of that period which would include the backlog from pre 2011 the proposed figures would result in double counting. It should also be noted that the residual method of calculation for the housing land supply will only be required to take into account those units not completed from 2011 onwards e.g. any provision under the required 690 units pa. It is also useful to note that sites subject to the signing of a section 106 will not be considered within the calculation of the 5 year land supply as noted in TAN1. It is useful to note that such sites have been deemed appropriate for development by the Council having been permitted planning permission subject to a legal agreement, therefore they have been identified within the plan as sites which are compliant with the plans strategy and are considered to be deliverable within the plan period.

As illustrated above the perception that the Plan is overly reliant on sites inherited from the UDP period is not well founded. In addition a number of the sites outlined by the developer as being undeliverable are in fact progressing e.g. Alcan. Not all the sites noted are counted as part of the housing supply due to the lack of evidence of deliverability e.g. Newport Athletic Club. The Council has been realistic in its approach to the housing supply set out in the Plan which is based on the annual JHLAS process to ensure that the sites can be delivered to ensure the strategy is met.

Range and Choice

The supply of housing is considered to provide for a clear range and choice of housing which is a clear concern for many representors. The housing sites within the Plan are located across the City, with a clear focus on regeneration in the east as per the established strategy. The Plan provides a supply of affordable units for a mixture of needs as well as providing a mix of family homes and inner city living to cater for the broad housing market. The opportunity to provide homes in more rural locations has been investigated and there was no clear evidence to justify expansion to existing settlements. The Plan therefore has provided the opportunity for exception sites where such justification can be produced.

Flexibility

As the representation notes there is no set flexibility figure required for housing supply within development plans. However, during the examination of the Brecon Beacons National Park LDP WG noted a notional figure of 10% but that needed to reflect local circumstances. Other authorities within South East Wales have a range of 12-20% flexibility. It is good practice to allow for unknowns and the need for flexibility within a development plan is inherent from National Planning Policy. In Newport’s case the majority of the housing supply has planning permission or is being progressed. Those remaining 9 sites without planning permission are in line with the overall strategy or regeneration needs of the plan. Together they provide a 12% oversupply which is considered appropriate to enable to plan to cope with uncertainties that may arise over the plan period.

Strategy compliance and delivery.

It is considered that the plan provides a more than adequate supply of housing, both market and affordable, which is both deliverable and viable. Many of the sites have progressed since the Revised Deposit Plan was written and there is a steady supply of housing being achieved across Newport. The Plan identifies its housing and employment land supply for the plan period based on an assessment of need. The clear strategy for the Plan is for growth and it will be through the successful implementation of the policies of the Plan that this will be achieved. There is a clear link between housing supply and economic growth which is why the supply will be monitored annually.

The alternative site at Cwrt Camlas is a Greenfield site positioned in land designated as Countryside in the Local Development Plan. The plan seeks to promote the reuse of Brownfield sites in preference to extensive use of Greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities.

The forecast housing need has been assessed in the context of population and employment projections and current market realities. The plan allocates sufficient land to meet this requirement. Additional housing allocations in a rural location cannot therefore be justified. Furthermore, the release of the representation site for housing would be contrary to the Council’s strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.
It is recommended that this site is not included in the Local Development Plan for residential purposes.
### Representation Details

**Document:** Revised LDP, p.65  
**Policy:** H01  
**Summary:** Allocate land at Cwrt Camlas for residential development.

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**Agent:** Boyer Planning  
**Date Lodged:** 26/07/2013  
**Accession No:** 321.L2//H01  
**Source:** P  
**Type:** O  
**Mode:** I  
**Status:** M  
**Status Modified:** 12/02/2014  
**Page 221 of 1581**
1.0 Introduction

1.1 The John Family and Newbridge Estates Ltd objects to the omission of the land adjoining Cwrt Camlas, Rogerstone as a residential allocation from within Policy H1. The land concerned is shown on the attached plan.

1.2 Omission of this land from the housing allocations results in the Deposit Local Development Plan being unsound in terms of the following tests:

- C2 in that the housing allocations are not sufficiently robust of flexible to ensure compliance with national policy as set out in Planning Policy Wales;
- CE2 in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base in terms of future housing needs; and
- CE4 in that omitting the site from the housing allocations does not provide a reasonable level of flexibility to allow the Deposit Plan to deal with a higher housing requirement to meet local needs.

2.0 Site Description

2.1 The triangular shaped 3ha site is situated to the northwest of Junction 27 of the M4 and comprises grazing land. To the south the site immediately adjoins the recently constructed Serrenu Children's Centre and housing estate of Cwrt Camlas and is bound to the west by existing housing on Cwm Lane. The northern boundary of the site is defined by Pensarn Farm Lane, whilst the eastern boundary is defined by hedgerows separating the site from further grazing land. The site is accessed directly from Cwrt Camlas housing estate.

2.2 Rogerstone has a good range of retail and community facilities that are all within reasonable walking and cycling distance, including post offices, a health centre, various convenience stores, public houses, take away food outlets, petrol filling stations, hairdressers, churches (various denominations) and a veterinary clinic. High Cross and Rogerstone Primary School and Bassaleg Secondary School are conveniently located to the site. There are also local employment areas at the Wern and Tregwilym Road Industrial Estates as well as at Afon Village where there is a railway station linking Rogerstone to Cardiff and Ebbw Vale.

2.3 The site is also in close proximity to a number of Bus stops with shelters which are located on High Cross Road near to the junctions of Cwm Lane and High Cross Lane, circa 250 metres from the site. These stops are serviced by regular bus services (linking with Newport Town Centre, approximately 2 miles distant and various towns in the eastern valley as well as the national rail network at Newport).

3.0 Compliance with Deposit LDP

3.1 The acceptability of the site for inclusion within the housing allocations set out in Policy H1 and its compliance with the policy of the Deposit LDP are identified in separate submissions as briefly outlined below:

Housing Requirement

3.2 As detailed within the separate submissions made in relation to Policy H1 - Housing Sites there is clear need to provide further residential allocations. It is noted that due to concerns over deliverability of some of the proposed allocated sites as well as the requirement to meet local needs as set out within the Local Housing Market Assessment the housing land supply is inadequate to meet the identified 10,350 dwellings.

3.3 Therefore, it is evident that appropriate new housing allocation sites will be required to provide land which is immediately available and within a sustainable location. In this case the site at land adjoining Cwrt Camlas, Rogerstone would actively assist in providing a deliverable housing site to address the identified shortfall.

Settlement Boundary

3.4 As detailed within separate representations made on Policy SP5 - Countryside, it is wholly appropriate for the modest extension to the settlement boundary at Rogerstone. This extension will assist to accommodate additional housing development in order to provide a greater degree of flexibility within the plan to accommodate growth overall.

4.0 Development Framework Document

4.1 In considering the above policies and in order to assist with establishing the most appropriate sites for further residential development a supporting Development Framework Document has been prepared for the site at land adjoining Cwrt Camlas, Rogerstone.

4.2 The Development Framework Document incorporates the results of a broad ranging assessment of environmental and other matters. It outlines the proposed development concept which responds to the assessments carried out and provides a masterplan to illustrate that the development of the site provides a logical choice for approximately 30 dwellings. It is therefore evident that the development of the site will seek to meet the housing need through the Development Plan period within the sustainable settlement location.
5.0 Required Change
5.1 That the land adjoining Cwrt Camlas, Rogerstone is allocated for housing development within Policy H1 as a new site for 30 dwellings in order to meet the needs of the local community.

12 12 Speaking at Public Examination
Due to significant issues raised in the attached representations.

Item Question  Council Responses
2 2 Soundness of LDP
The response to comments made on Policy H1 Housing Provision can be viewed against representation 321.L1.
## Representation Details

<table>
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<tr>
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**Document:** Revised LDP, p.21

**Policy:** SP05

**Summary:** Amend the Countryside designation to allow residential development at Cwrt Camlas, Rogerstone.

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<tr>
<td>8</td>
<td>8</td>
<td>Candidate Site Name</td>
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</tbody>
</table>

Court Camlas, Rogerstone.
1.0 Introduction

1.1 The John Family and Newbridge Estates objects to the inclusion of land adjacent to Cwrt Camlas within the Countryside and the omission from within the settlement boundary of Rogerstone. The land concerned is shown on the attached plan.

1.2 Omission of this land from the settlement boundary results in the Deposit Local Development Plan being unsound in terms of the following tests:

- C2 in that the settlement boundary is not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales;
- CE2 in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base in terms of future housing needs; and
- CE4 in that the restrictive settlement boundary does not provide a reasonable level of flexibility to allow the plan to deal with future circumstances.

2.0 Amplification

2.1 Housing Requirement

2.1.1 As detailed within the separate submission made in relation to Policy H1 - Housing Sites there is clear need to provide further residential allocations. It is noted that due to concerns over deliverability of some of the proposed allocated sites as well as the requirement to meet local needs as set out within the Local Housing Market Assessment the housing land supply is inadequate to meet the identified 10,350 dwellings.

2.1.2 Therefore, it is evident that appropriate new housing allocation site will be required to provide land which is immediately available and within a sustainable location. In this case the revision to the settlement boundary at Rogerstone to incorporate the site adjoining Cwrt Camlas would actively assist in providing a deliverable housing site to address the identified shortfall.

Planning Policy Wales

2.3 In the context of the requirement for additional housing sites it is evident that there is a need to allow greater flexibility with the settlement boundary and seek to allocate further housing sites at appropriate locations.

2.4 As part of a sound plan, local Planning Authorities, in identifying sites to be allocated for housing should have regard to the principles of the search sequence as outlined within Paragraph 9.2.8 of Planning Policy Wales (2012 5th Ed). The paragraph outlines that Authorities should start with the re-use of previously developed land and buildings within settlements, then settlement extensions and then new development around settlements with good public transport links.

2.5 Given that a number of the existing allocated sites are on previously developed land and are constrained the Authority should seek to allocate sites within logical settlement extensions as per the next stage within the search sequence.

2.6 In doing so regard should be had to paragraph 9.2.9 of PPW which provides relevant criteria which Local Planning Authorities should consider in deciding which sites to allocate for housing.

2.7 The characteristics and locations of the site adjoining Cwrt Camlas accords with the relevant criteria in order to provide a sustainable settlement extension:

- The site immediately adjoins the settlement boundary of Rogerstone and is subject to urban influences;
- The extension of the settlement to provide residential development would wholly compatible with the neighbouring established land uses;
- Development of the site is not constrained by physical or environmental issues;
- The site is accessible to jobs, shops and services by modes other than the car, and
- The site is located where the capacity of existing and potential infrastructure, including public transport, water and sewerage, other utilities and social infrastructure, are available.

2.8 The principles and criteria as set out in Planning Policy Wales have been taken into consideration with the preparation of a Development Framework Document.

3.0 Development Framework Document

3.1 In order to assist with establishing the most appropriate settlement extension sites a Development Framework Document to support the site adjoining Cwrt Camlas as a housing allocation site and the consequent inclusion within the settlement boundary of Rogerstone has been prepared.

3.2 The Development Framework Document incorporates the results of a broad ranging assessment of environmental and other matters. It outlines the proposed development concept which responds to the assessments carried out and provides a masterplan to illustrate that the development of the site can contribute to meeting the housing need through the Development Plan period within the
**Representation Details**

**by:**  
(No grouping)

**Filtered to show:** (all of) Stage=L; Status=M

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</table>
4.1 That the site adjoining Cwrt Camlas be removed from the Countryside and the settlement boundary for Rogerstone be amended to include land to the as shown on the attached plan. |  
Due to the significant issues raised in the representation. |  
Yes |  
Due to the significant issues raised in the representation. |

**Item Question**

<table>
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<tr>
<th>Item Question</th>
<th>Council Responses</th>
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<tbody>
<tr>
<td>2.2 Soundness of LDP</td>
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</table>
No change. The site is a Greenfield site positioned in land designated as countryside in the Revised Deposit LDP. The plan seeks to promote the reuse of Brownfield sites in preference to extensive use of Greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities.  
The forecast housing need has been assessed in the context of population and employment projections and current market realities. The plan allocates sufficient land to meet this requirement. Additional housing allocations in a Greenfield location cannot therefore be justified. Furthermore, the release of the representation site for housing would be contrary to the Council’s strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.  
A background paper ‘Delivery and Implementation’ has been produced to expand on the information supplied in Chapter 13 of the Deposit LDP. This sets out the proposed phasing, constraints and infrastructure requirements for each allocation. The Delivery of each site is considered here, setting out the justification for its continuation in the plan based on evidence from developers and landowners. Some of the large brownfield sites allocated within the previous Unitary Development Plan have started construction e.g. Glan Llyn with 4000 homes and employment uses on the site. The impact on development by the economic recession is to be considered and the plan takes a long term view across the entire plan period. The LDP sets out a strategy for growth which allocates an adequate supply of land for residential and employment uses. The supply of this land is not concentrated in one area but across the City. It is recognised that growth in the east is significant but the west has not been overlooked with large brownfield sites allocated at Novelis, former Whitehead Works and Monmouthshire Bank Sidings. The review of village boundaries has clearly considered the need for expansion in these areas and following their assessment boundaries have been tightened and allocations resisted due to the unsuitability of sites proposed in these unsustainable locations.  
It is recommended that this site is not included in the Local Development Plan for residential purposes and remains allocated as countryside. |  
No change. The site is a Greenfield site positioned in land designated as countryside in the Revised Deposit LDP. The plan seeks to promote the reuse of Brownfield sites in preference to extensive use of Greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities.  
The forecast housing need has been assessed in the context of population and employment projections and current market realities. The plan allocates sufficient land to meet this requirement. Additional housing allocations in a Greenfield location cannot therefore be justified. Furthermore, the release of the representation site for housing would be contrary to the Council’s strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.  
A background paper ‘Delivery and Implementation’ has been produced to expand on the information supplied in Chapter 13 of the Deposit LDP. This sets out the proposed phasing, constraints and infrastructure requirements for each allocation. The Delivery of each site is considered here, setting out the justification for its continuation in the plan based on evidence from developers and landowners. Some of the large brownfield sites allocated within the previous Unitary Development Plan have started construction e.g. Glan Llyn with 4000 homes and employment uses on the site. The impact on development by the economic recession is to be considered and the plan takes a long term view across the entire plan period. The LDP sets out a strategy for growth which allocates an adequate supply of land for residential and employment uses. The supply of this land is not concentrated in one area but across the City. It is recognised that growth in the east is significant but the west has not been overlooked with large brownfield sites allocated at Novelis, former Whitehead Works and Monmouthshire Bank Sidings. The review of village boundaries has clearly considered the need for expansion in these areas and following their assessment boundaries have been tightened and allocations resisted due to the unsuitability of sites proposed in these unsustainable locations.  
It is recommended that this site is not included in the Local Development Plan for residential purposes and remains allocated as countryside. |
### Representation Details

**Rep'n/Para/Policy:** 329.L1//SP01  
**Representor:** Attewell and S Gardner, Mr L H  
**Agent:** Bruton Knowles  
**Accession No:** 26/07/2013  
**Date Lodged:** 26/07/2013  
**Status:** M  

**Document:** Revised LDP, p.16  
**Policy:** SP01  
**Map:** Proposals East: Proposals Plan - East  

**Summary:** Require the plan to include more mixed used sites.

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<th>Question</th>
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<td>The Plan allocates a range and choice of sites for a range of uses. Policy EM02 – Regeneration, in particular allocates 10 sites for a mixture of uses, including Whitehead Works, Novelis and the eastern end of the former Llanwern Steelworks site. No change is therefore considered necessary to the Plan.</td>
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<td>CE1, CE2, CE4, C2, C3</td>
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**Document: Revised LDP, p.21**

**Policy: SP05**

**Summary:** Remove site from countryside allocation.

**Agent:** Derek Prosser Associates

**Accession No:** 333.L1/SP05

**Date Lodged:** 22/09/2013

**Status:** M

**Type:** P

**Mode:** O

**Status Modified:**
The Plan is clearly unsound as it excludes this modest site of 3.16 acres from the urban area and refers to it as countryside policies pertaining, when it is an isolated area of land which is undeveloped but surrounded by urban development and features. The Plan does not appear to explain the significance of the urban boundary or how it has been defined.

This representation seeks the removal of the site from the protective designation as countryside and its inclusion within an amended urban boundary. It should remain undesignated within the urban boundary or be redesignated as an employment or leisure and sporting facilities use to reflect the development of land to the east and across the A48 to the south.

The site is clearly defined by the A449 dual carriageway to the north and west; a major hotel and a mix of commercial and residential development to the east; and the A48 dual carriageway to the south. To the south of the A48 are also a hotel, restaurant and other commercial activities which are considered to be within the Langstone village area. The A449 has recently been the subject of major works to improve the efficiency of the Coldra Roundabout and in conjunction with the urban development in its immediate vicinity, it has a strong urban feel to it. This western concentration of development at Langstone, closest to the Coldra Roundabout, is strongly defined by the A449 acting as its northern boundary and the M4 acting as its southern boundary. This representation site with the even more modest are known as Coldra Wood, is the only are of such scale between the A449 and the M4 which is not either developed or committed for development.

As ancient woodland, the adjoining Coldra Wood, isolated from the remainder of Coldra Wood by the construction of the A449 dual carriageway, has a strong justification for being retained as amenity land and protected from future development. However, there is not justification for this isolated pair of fields being misleadingly referred to as countryside and protected from future development. It is not open countryside beyond a logical urban boundary.

To the east of the site, north of A48 and south of the A449, the prevailing character is of high quality development in open landscaped settings. This is the style of development which the Council has encouraged alongside the major junction on the M4 corridor over the past 2 decades. Such development displays the dynamics of such a location and such locations are highly prized. They are being exhausted however, and though modest in scale, this is one of few which are left. There is not good planning reason why this site should be excluded from the prospect of being a future development opportunity to compliment those which adjoin the site.

The development of this site would not detract from the setting of the nearby Langstone Village employment or the wider local area. Since the early 1990’s development pressures increased substantially resulting in significant changes to the appearance of the area but bringing much needed investment and employment. The requirements of the future are little different with National Government emphasising that local planning authorities need to more readily make appropriate development sites in the short term to kick-start a lethargic economy.

The site sits below the levels of the A48 and A449, strong boundaries made up of mature trees and hedgerows will help to soften the impact of built development as they have done along the road frontages to the adjoining developments. Such features need only be interrupted by access along the A48 frontage, which would ideally be designed on the basis of left in and left out taking advantage of the proximity of roundabout junctions on the A48 to east and west. Such an arrangement maximises visibility along this length of frontage and minimises traffic conflicts to other users of the highway. Development of this site need not harm the trees, hedgerows and ecological features of the site for which mitigation can be arranged.

Item Question | Tick-box reply
--- | ---
2 2 | Soundness of LDP | No

Item Question | Council Responses
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No change. The site is considered part of the landscape setting for Langstone Park and in particular the Hotel. The retention of the wedge of open land complements the protected Coldra Woods and the wooded land adjoining the A449. Development of the site would not enhance the environment of Langstone Park and the local area.

The Inspector chose not to allocate this land at the time of the UDP Inspectors Report in August 2005 and circumstances have not changed sufficiently to warrant reconsideration.

With regards to the comments relating to the availability of land for commercial development, it is considered that the Employment Land Review and subsequent allocations in the LDP provide sufficient land for those types of developments, without the need to allocate this site.

It is recommended that this site is not included in the Local Development Plan for development and remains allocated as countryside.
The Plan is clearly unsound as it excludes this modest site of 3.16 acres from the urban area and refers to it as countryside policies pertaining, when it is an isolated area of land which is undeveloped but surrounded by urban development and features. The Plan does not appear to explain the significance of the urban boundary or how it has been defined.

This representation seeks the removal of the site from the protective designation as countryside and its inclusion within an amended urban boundary. It should remain undesignated within the urban boundary or be redesignated as an employment or leisure and sporting facilities use to reflect the development of land to the east and across the A48 to the south.

The site is clearly defined by the A449 dual carriageway to the north and west; a major hotel and a mix of commercial and residential development to the east; and the A48 dual carriageway to the south. To the south of the A48 are also a hotel, restaurant and other commercial activities which are considered to be within the Langstone village area. The A449 has recently been the subject of major works to improve the efficiency of the Coldra Roundabout and in conjunction with the urban development in its immediate vicinity, it has a strong urban feel to it. This western concentration of development at Langstone, closest to the Coldra Roundabout, is strongly defined by the A449 acting as its northern boundary and the M4 acting as its southern boundary. This representation site with the even more modest are known as Coldra Wood, is the only area of such scale between the A449 and the M4 which is not either developed or committed for development.

As ancient woodland, the adjoining Coldra Wood, isolated from the remainder of Coldra Wood by the construction of the A449 dual carriageway, has a strong justification for being retained as amenity land and protected from future development. However, there is not justification for this isolated pair of fields being misleadingly referred to as countryside and protected from future development. It is not open countryside beyond a logical urban boundary.

To the east of the site, north of A48 and south of the A449, the prevailing character is of high quality development in open landscaped settings. This is the style of development which the Council has encouraged alongside the major junction on the M4 corridor over the past 2 decades. Such development displays the dynamics of such a location and such locations are highly prized. They are being exhausted however, and though modest in scale, this is one of few which are left. There is not good planning reason why this site should be excluded from the prospect of being a future development opportunity to compliment those which adjoin the site.

The development of this site would not detract from the setting of the nearby Langstone Village employment or the wider local area. Since the early 1990’s development pressures increased substantially resulting in significant changes to the appearance of the area but bringing much needed investment and employment. The requirements of the future are little different with National Government emphasising that local planning authorities need to more readily make appropriate development sites in the short term to kick-start a lethargic economy.

The site sits below the levels of the A48 and A449. strong boundaries made up of mature trees and hedgerows will help to soften the impact of built development as they have done along the road frontages to the adjoining developments. Such features need only be interrupted by access along the A48 frontage, which would ideally be designed on the basis of left in and left out taking advantage of the proximity of roundabout junctions on the A48 to east and west. Such an arrangement maximises visibility along this length of frontage and minimises traffic conflicts to other users of the highway.

Development of this site need not harm the trees, hedgerows and ecological features of the site for which mitigation can be arranged.
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### Item Question

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<th>Item Question</th>
<th>Council Responses</th>
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<tbody>
<tr>
<td>13 13 Council Response</td>
<td>No change. The site is considered part of the landscape setting for Langstone Park and in particular the Hotel. The retention of the wedge of open land complements the protected Coldra Woods and the wooded land adjoining the A449. Development of the site would not enhance the environment of Langstone Park and the local area. The issue of the development was considered and rejected in Planning Appeal 91/0853. The Inspector chose not to allocate this land at the time of the UDP Inspectors Report in August 2005 and circumstances have not changed sufficiently to warrant reconsideration. With regards to the comments relating to the availability of land for commercial development, it is considered that the Employment Land Review and subsequent allocations in the LDP provide sufficient land for those types of developments, without the need to allocate this site. It is recommended that this site is not included in the Local Development Plan for development and remains allocated as countryside. The Settlement Boundary Methodology outlines the reasoning behind the boundary form. The settlement boundary has been drawn tightly along the existing built form and direct development to brownfield sites in accordance with the Plan strategy.</td>
</tr>
</tbody>
</table>

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356.L1//General G Thomas, Mrs L H 18/07/2013 P S M

Document: Revised LDP, p.75
Policy: General G&T
Summary: Support Plan in particular reference to location of Gypsy sites

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<tr>
<th>Item Question</th>
<th>Representation Text</th>
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<tbody>
<tr>
<td>11 11 Representation</td>
<td>Following revisions to the above Development Plan particularly with regard to the location of the Gypsy and Traveller sites, please note that I fully support this revised plan.</td>
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### Item Question

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<th>Item Question</th>
<th>Council Responses</th>
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<tr>
<td>13 13 Council Response</td>
<td>Support noted.</td>
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</table>

12/02/2014 Page 232 of 1581
### Representation Details

**Document**: Revised LDP, p.22  
**Policy**: SP08  
**Summary**: Propose new boundary to SLA in Langstone

<table>
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<tr>
<th>Item Question</th>
<th>Representation Text</th>
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<tr>
<td>11</td>
<td>Further improvement could be made to the Plan in protecting Langstone Village from further major development by adding the Countryside north of the A48 that is outside the boundary settlement, up to and including Old Roman Road, and designing it as a 'Special Landscaped Area'.</td>
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<th>Item Question</th>
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<td>13</td>
<td>The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales’ guidance. Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.</td>
</tr>
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</table>
### Representation Details

**Document:** Revised LDP, p.16  
**Policy:** SP01  
**Summary:** Support Policy SP1 emphasis to conserving use of water.

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<th>Item Question</th>
<th>Representation Text</th>
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<td>11</td>
<td>DCWW support this policy in particular the emphasis to conserving the efficient use of water. From a statutory undertaker's perspective this can reduce the amount of water used and wasted, reduce the effect on water resources both in terms of quantity and quality and maximise the use of sustainable drainage systems. We fully support any policy that promoted the sustainability of proposed development and look to your Authority to ensure appropriate designs include water efficiency and sustainable drainage proposals and comply with the Code for Sustainable Homes and BREEAM standards. The tackling of surface water at source is a vital component of sustainable development and the Flood and Water Management Act 2010 reinforces the obligations for developers to incorporate sustainable drainage measures as part of their developments. The management of surface water at source goes a long way to mitigating against overloaded sewers which can ultimately lead to flooding.</td>
</tr>
<tr>
<td>12</td>
<td>DCWW hold invauable information on its assets and inspectors at other LDP Examinations have requested such information to demonstrate viability and deliverability of allocations.</td>
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### Council Responses

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<th>Council Response</th>
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<td>Support noted.</td>
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12/02/2014
**Representation Details**

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<td>11</td>
<td>Representation</td>
<td>This is an important policy for us as a water and sewerage undertaker. We are particularly supportive of policies that aim to maximise sustainable options that impact on water supply provision, the disposal of surface &amp; foul discharges and the protection of water quality. River abstraction and groundwater springs are a vital source, after treatment, of portable water supplied to our domestic and industrial customers. We fully support any measure that is designated to prevent any possible degrodation of water resources, as it is almost unthinkable in terms of costs, inconvenience and operational problems if such sources are polluted, contaminated or lost. Our Abstraction Licence covers both water quality and quantity and therefore it is imperative that both are protected. We welcome any opportunity to reduce and/or eliminate the amount of surface water that drains to our foul sewerage network as this can cause flooding. The use of sustainable drainage practices is fully endorsed as it is unsustainable and uneconomical for us to simply build bigger pipes to accept these flows.</td>
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**Council Responses**

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<th>Item</th>
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Document: Revised LDP, p.28  
Policy: SP13  
Summary: Support Policy SP13 Planning Obligations to ensure sufficient levels of infrastructure.

### Item Question  
**Representation Text**

11  
We fully support this Policy. As a Statutory Water and Sewerage Undertaker, we always try to ensure that sufficient infrastructure exists for domestic developments. However, where such facilities may be deficient, capital investment under our 5 year Investment Plans usually remedy the problem. Our planned investment is dictated by our Regulators, Ofwat and the Environment Agency in terms of the funding received, the environmental standards and the timing of our planned regulatory work. Therefore there may be instances where a developers' needs may not coincide with the timing of our planned investment, in particular where "lead in" times are required.

We support the use of Planning Conditions and related Section 106 Agreements of Town & Country Planning Act which may enhance the quality of development and enable proposals to go ahead which might otherwise be refused. Where development will create a need for extra facilities, in advance of an Undertaker's Regulatory investment, it may be reasonable for developers to meet or contribute towards the cost of providing such facilities.

### Item Question  
**Council Responses**

13  
**Council Response**

Support noted.
Climate change is potentially our biggest challenge and building larger infrastructure is simply unaffordable, unsustainable and not in the interests of customers. The removal and/or reduction of surface water entering the sewerage system is essential if we are to deliver new development in a sustainable manner. Dealing with surface water at source is essential and we have to think differently and innovatively in how we achieve this together with learning and sharing the research and findings of earlier work conducted in this area. Planning Policy, associated TAN's and the new Flood & Water Management Act will go a long way towards achieving sustainable development.

Council Response
Support noted.

Planning Policy Wales states that the planning system has an important part to play in ensuring the infrastructure on which communities and businesses depend is adequate to accommodate proposed development. The importance of utility services for the promotion of new development and their sustainability is reference in Chapter 12.

Council Response
Support noted.
## Representation Details

**Rep'n/Para/Policy** | **Agent** | **Accession No** | **Date Lodged** | **Late?** | **Source** | **Type** | **Mode** | **Status** | **Status Modified**
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357.L6//GP05 | Dwr Cymru Welsh Water | 22/07/2013 | | | | | | | |

**Document:** Revised LDP, p.43  
**Policy:** GP05  
**Summary:** Support measures designed to prevent derogation of water resources.

### Item Question  
**Representation Text**

11  
River abstraction and groundwater springs are a vital source, after treatment, of potable water supplied to our domestic and industrial customers. We fully support any measure that is designed to prevent any possible derogation of water resources, as it is almost unthinkable in terms of costs, inconvenience and operational problems if such sources are polluted, contaminated or lost.

### Item Question  
**Council Responses**

13  
Support noted.

## Representation Details

**Rep'n/Para/Policy** | **Agent** | **Accession No** | **Date Lodged** | **Late?** | **Source** | **Type** | **Mode** | **Status** | **Status Modified**
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357.L7//GP06 | Dwr Cymru Welsh Water | 22/07/2013 | | | | | | | |

**Document:** Revised LDP, p.47  
**Policy:** GP06  
**Summary:** Support policy which promotes sustainability of proposed developments through design.

### Item Question  
**Representation Text**

11  
We fully support any policy that promotes the sustainability of proposed development and look to your Authority to ensure appropriate designs include water efficient and sustainable drainage proposals and comply with the Code for Sustainable Homes and BREEAM standards.

### Item Question  
**Council Responses**

13  
Support noted. Once adopted, the LDP will form the basis upon which planning applications are considered, including the application of general development policies, such as design.
### Item Question  Council Responses

13 13  
Comment noted. An application for 82 units is currently being considered by the Council. This takes into account the location of the sewer, therefore we have some certainty over the deliverable density of the site.
### Representation Details

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Document: Revised LDP, p.68  
Policy: H01.50  
Summary: Presence of sewerage infrastructure on the site to be protected.

#### Item Question  
Representation Text

11  
The site is crossed by a 900mm diameter sewer and 870mm*650mm sewer. Protection measures are required for these strategic assets. The presence of these assets will restrict the density proposed for this site.

#### Council Response

Any application on the site will need to consult with Welsh Water and through such discussions the presence of sewers will be highlighted and measures agreed to protect them. The total number of units is to be finalised through detailed application, the figure set out in the plan indicates an appropriate density for the site.

---

| 357.L11/H01.51   | Dwr Cymru Welsh Water |       | 22/07/2013   | P           | C     | M      |      |      |        |                 |

Document: Revised LDP, p.68  
Policy: H01.51  
Summary: Further investigation required to establish capacity of sewerage system.

#### Item Question  
Representation Text

11  
The topography of the site will need to be assessed to establish where a connection to the public sewerage system can be made as there could be several options dependant of actual site layout. Additionally, a connection may require a pumped arrangement. Foul flows will drain to Alexandra Court Sewerage Pumping Station. The cumulative effect of this site and H52 Old Town Dock remainder will require an assessment of this SPS to be undertaken to establish whether improvements are required. Any improvements can be procured through the sewer requisition provisions of the Water Industry Act 1991.

#### Council Response

Comment noted. This would be dealt with at the planning application stage.
### Representation Details

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**Document:** Revised LDP, p.68  
**Policy:** H01.52  
**Summary:** Assessment of capacity of sewerage system required.

**Item Question**  
Foul flows will drain to Alexandra Court Sewerage Pumping Station. The cumulative effect of this site and H51 Whitehead works will require an assessment of this SPS to be undertaken to establish whether improvements are required. Any improvements can be procured through the sewer requisition provisions of the Water Industry Act 1991.

**Council Response**  
Comment noted. This will be dealt with at the planning application stage.

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**Item Question**  
The site is crossed by a 1200mm diameter sewer and a 15 inch diameter sewer outfall pipe. Protection measures are required for these strategic assets. The presence of these assets will restrict the density proposed for this site.

**Council Response**  
Comment noted. This will be dealt with at the planning application stage.

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<td>Council Response</td>
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**Item Question**  
Council Response

Comment noted. This will be dealt with at the planning application stage.
### Representation Details

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Document: Revised LDP, p.68

Policy: H01.54

Summary: Requirements for water and sewerage supply required.

**Item Question Representation Text**

11 11 Representation

Given the size of this allocation, we would need to undertake hydraulic modelling assessments for both water supply and sewerage to establish how we would service this site.

**Item Question Council Responses**

13 13 Council Response

The former Alcan site has been granted planning approval for up to 1200 units with a signed section 106 agreement, and there is movement on the site with site clearance and remediation.

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### Representation Details

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Document: Revised LDP, p.68

Policy: H01.55

Summary: Extensive offsite provision required as well as an assessment of capacity of sewerage system.

**Item Question Representation Text**

11 11 Representation

All our services are located on the opposite side of Ringland Way, which is a major highway. Extensive off-site provision of services are required. Additionally, foul flow would impact on Hartridge Sewage Pumping Station and an assessment of this SPS is required to establish whether improvements are required.

**Item Question Council Responses**

13 13 Council Response

Comment noted. This will be dealt with at planning application stage.

12/02/2014
### Representation Details

**Document:** Revised LDP, p.79  
**Policy:** EM01  
**Summary:** Early dialogue is required from developers and the requirement of hydraulic modelling.

#### Item Question  Representation Text

**11 11 Representation**

Generally we can provide 'domestic' water supply and sewerage disposal to the employment allocations. We note the magnitude of these developments and once the end users are known and demands confirmed we will need to run hydraulic modelling assessment to understand the impact on our assets.

For any employment proposal which would involve a 'wet trade' we would encourage early dialogue with DCWW so that solutions can be examined. Should any proposal require to discharge trade effluent into the public sewer then the Consent of the statutory sewerage undertaker is required (Section 118 Water Industry Act 1991). Additionally, dependent on the processes involved, an element of pre-treatment may also be required.

#### Item Question  Council Responses

**13 13 Council Response**

Comment noted.

---

### Representation Details

**Document:** Revised LDP, p.81  
**Policy:** EM02  
**Summary:** Advise developers to contact DCWW and need for hydraulic modelling on the sites.

#### Item Question  Representation Text

**11 11 Representation**

Generally we can provide 'domestic' water supply and sewerage disposal to the employment allocations. We note the magnitude of these developments and once the end users are known and demands confirmed we will need to run hydraulic modelling assessment to understand the impact on our assets.

For any employment proposal which would involve a 'wet trade' we would encourage early dialogue with DCWW so that solutions can be examined. Should any proposal require to discharge trade effluent into the public sewer then the Consent of the statutory sewerage undertaker is required (Section 118 Water Industry Act 1991). Additionally, dependent on the processes involved, an element of pre-treatment may also be required.

#### Item Question  Council Responses

**13 13 Council Response**

Comment noted.

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12/02/2014
Document: Revised LDP, p.83
Policy: EM03
Summary: Early consultation with DCWW and need for hydraulic modelling on the sites.

Item Question  Council Responses

11 11  Representation

Generally we can provide 'domestic' water supply and sewerage disposal to the employment allocations. We note the magnitude of these developments and once the end users are known and demands confirmed we will need to run hydraulic modelling assessment to understand the impact on our assets. For any employment proposal which would involve a 'wet trade' we would encourage early dialogue with DCWW so that solutions can be examined. Should any proposal require to discharge trade effluent into the public sewer then the Consent of the statutory sewerage undertaker is required (Section 118 Water Industry Act 1991). Additionally, dependant on the processes involved, an element of pre-treatment may also be required.

Item Question  Council Responses

13 13  Council Response

Comment noted.
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Document: Revised LDP, p.108
Policy: CF07
Summary: Request an additional wording for horse related policy to ensure no pollution of surface water.

**Representation**

We request the inclusion of an additional paragraph to this policy,

New paragraph:

Horse related developments should ensure that effective drainage methods are implemented and maintained to ensure surface water mixed with animal excrement does not pollute the environment and potentially derogate surface and groundwater sources.

**Council Response**

It is not considered necessary to make the suggested change, since the particular merits and shortcomings of sites (including drainage issues) would be assessed, in the light of consultation responses, during the development-management process.

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Document: Revised LDP, p.140
Policy: Procedures
Summary: Request to be involved in the production of Site Specific Development Briefs

**Representation**

We note the reference to Site Specific Development Briefs. DCWW, as a statutory undertaker and owners of water supply and sewerage assets, would welcome being involved in this process to provide you with the relevant and most up to date information on our assets.

**Council Response**

Request noted.
<table>
<thead>
<tr>
<th>Document: Revised LDP, p.6</th>
<th>Policy: Intro &amp; Overview</th>
<th>Summary: Support the Revised Newport LDP.</th>
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**Representation Details**

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**Representation**

I fully agree with the revised Newport LDP, and hope that it is accepted by the Inspector. I appreciate the tremendous amount of work that has been done by the team.

**Council Response**

Support noted.

<table>
<thead>
<tr>
<th>Document: Revised LDP, p.21</th>
<th>Policy: SP06</th>
<th>Summary: Support the retention of Green Belt with amendments.</th>
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**Representation Details**

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**Representation**

I strongly support SP06: Retention of Green Belt and proposed minor extension.

**Speaking at Public Examination**

No

**Council Response**

Support noted.
**Representation Details**

**by:** (No grouping)

**Filtered to show:** (all of) Stage=L; Status=M

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<th>Rep'n/Para/Policy</th>
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<th>Agent</th>
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<th>Source</th>
<th>Type</th>
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<td>Caston, Mr R J</td>
<td></td>
<td></td>
<td>26/07/2013</td>
<td>P</td>
<td>S</td>
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</table>

**Document:** Revised LDP, p.22

**Policy:** SP08

**Summary:** Support the proposed SLA at Rhiwderin and objects to Candidate Sites proposed in that area.

**Item Question** | **Representation Text**
---|---
11 | I strongly support: SP08) Special Landscape Areas - specifically (ii) "West of Rhiwderin" - in reality all the Countryside bordering the built up area of Bassaleg and Rhiwderin.
I strongly object to the inclusion of any of the "candidate sites" (listed below) within this SLA. This would contravene the objectives of policy CE5 (Environmental Spaces, q.v.) In addition, the highway network (both principal and local) is incapable of supporting any further large-scale developments.
Therefore the following "candidate sites" should be deleted from the Plan.
Ref: 65.C2 Pentrepoeth
144.C1 Penylan/Pentrepoeth
166.c1 Griffin
166.C2 Griffin
2072.C1 Gloch Wen
2072.C2 Gloch Wen
2073.C3 Glochwen

12 | Speaking at Public Examination

**Item Question** | **Council Responses**
---|---
2 | Soundness of LDP

**Tick-box reply**

**Yes**

13 | Council Response

Support noted.
Representation Details

Filtered to show: (all of) Stage=L; Status=M by: (No grouping)

Rep'n/Para/Policy     Representor                                                                      Agent              Accession No Date Lodged Late?   Source   Type    Mode     Status     Status Modified
694.L3/H01.12 Caston, Mr R J 26/07/2013 O M

Policy: H01.12
Summary: Reservations as to the scope for further development at former Tredegar Park Golf Course and impact on Pentrepoeth area.

Item Question  Representation Text
11 11 I have strong reservations re. the development of this site (part of former Tredegar Park Golf course) although permission has been granted, especially since the developers have approached the members of the adjoining Whitehead Sports and Social Club with a view to taking over the latters premises for residential development. I understand that an offer has been made of £5M for the site, or alternative premises on clients land at the Griffin (Candidate Site(S) 166C1/C2) which is within the area proposed as Special Landscape, which latter I strongly support.

If the development of facilities at 166C1/C2 were to be allowed, this would present a dangerous precedent for further development of the Griffin/Pentrepoeth area of countryside.

Item Question  Council Responses
12 12 Speaking at Public Examination
13 13 Council Response

Concerns over the development at Former Tredegar Park Golf Club and the Griffin are noted, as is support for the Special Landscape Area at The Griffin.
694.L4/H01.54

Caston, Mr R J

Accession No: 26/07/2013

Document: Revised LDP, p.68

Policy: H01.54

Summary: Require improvements to M4 and Railway station before development should proceed.

**Item Question**

11 Representation

I have strong reservations re. the re-development of this site.

As the current owners wish to use the majority of it for residential development (1200 units and probably more). Such large-scale development should not be permitted before the proposed improvements to M4 junction 28, and the proposed Pye Corner railway station are both completed.

**Item Question**

12 Speaking at Public Examination

No

**Item Question**

2 1 Soundness of LDP

Tick-box reply

Yes

**Item Question**

Councl Responses

Noted. The improvements to the station at Pye Corner have been announced and the need to improve junction 28 of the M4 to deal with the congestion in the area and would need to be progressed with the Welsh Government. The Council considers the impact on highways and access during the assessment of a planning application. Therefore any improvements required to the highway etc. would be conditioned to the application.
**Representation Details**

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<table>
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<th>Rep'n/Para/Policy</th>
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</table>

Document: Revised LDP, p.86
Policy: T01

Summary: Overall support of the proposals in particular site at Pye Corner, Bassaleg.

---

**Item Question**  
**Representation Text**

1) As above, in particular, I strongly support i) Building of a new station at Pye Corner, Bassaleg. ii) The provision of services from the Ebbw Valley to Newport and generally the several further proposals listed.

---

**Item Question**  
**Council Responses**

Support noted.
<table>
<thead>
<tr>
<th>Document: Revised LDP, p.6</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy: Intro &amp; Overview</td>
</tr>
<tr>
<td>Summary: Supports the Plan.</td>
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<thead>
<tr>
<th>Item Question</th>
<th>Representation Text</th>
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<tbody>
<tr>
<td>11 11</td>
<td>Representation</td>
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<tr>
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<td>No change required I support the general principals of the plan.</td>
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<tr>
<th>Item Question</th>
<th>Council Responses</th>
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<tr>
<td>12 12</td>
<td>Speaking at Public Examination</td>
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<td></td>
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<th>Item Question</th>
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<tr>
<td>2 2</td>
<td>Soundness of LDP</td>
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<tr>
<td></td>
<td>Yes</td>
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<tr>
<th>Item Question</th>
<th>Council Responses</th>
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<tr>
<td>13 13</td>
<td>Council Response</td>
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<tr>
<td></td>
<td>Support noted.</td>
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**Representation Details**

by: (No grouping)

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<th>Representer</th>
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<tbody>
<tr>
<td>1002.L1//Intro &amp; O</td>
<td>Brown, Mr A</td>
<td></td>
<td>10/07/2013</td>
<td>E</td>
<td>S</td>
<td>M</td>
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</table>
Having looked at the Plan, I am pleased to see that the Council has sufficient brownfield sites for development during the plan period. The only reservation I have in relation to Policy H5 'Affordable Housing Exceptions' (page 71), where it states "favourable consideration will be given to proposals for the provision of affordable housing on sites in or adjoining settlements, that would not otherwise be released for development..."

As you are aware, Fairoak Nursery, Bassaleg has been under constant pressure from developers to use this land for housing. I am concerned that Policy H5 would remove this land from its current status (greenfield site) as it clearly falls within the 'exceptions' i.e. adjoins settlements at The Griffin and Pentrepoeth Road. Developers have stated that the land is overgrown and an "eye sore", to the contrary, the land has been allowed to return to a natural habitat, contains an abundance of wildlife (including badgers), woodpeckers, etc. and should be protected for the future. The Council has resisted attempts to build on this land in the past but I feel this policy would no longer provide that protection. I would like to see this Policy reworded to include reference to the use of brownfield sites as a preference.

Bassaleg has won many awards for the 'Best Kept Village' which is a credit to its residents, it is village and should remain as such. I hope the Council will continue to work with residents, the community council and local campaign groups to help protect the community from mass housing, traffic noise and pollution all too evident in other areas.

---

Council Response

Support noted. The Plan's strategy and Policy SP1 clearly state the need for the prioritisation of brownfield land. Policy H5 does not open up the countryside for development but allows development for affordable housing adjoining existing settlements to meet a recognised level of need. This approach is noted in National Planning Policy and allows for existing communities to provide dwellings for those with a local need.
11/07/2013 O I M  

Document: Revised LDP, p.75  
Policy: H15.01  
Summary: Object to the Gypsy and Traveller allocation at Celtic Way, Coedkernew.

<table>
<thead>
<tr>
<th>Item Question</th>
<th>Representation Text</th>
<th>Tick-box reply</th>
</tr>
</thead>
</table>
| 11.11 Representation | 1. The site is proximate to a valuable commercial site which is essential to the development and prosperity of Newport. The siting of a traveller transit site in that area is quite contrary to the proper development of the area. It will discourage both present and future investment and will probably result in businesses moving and the loss of valuable jobs.  
2. The proposal has no facility for livestock e.g. horses. The Council will know that this area has been plagued over the years with roaming gypsy horses. | Yes            |
| 12.12 Speaking at Public Examination | H15 transit gypsy/traveller site at Celtic Way Coedkernew. Because the time allowed on this form is inadequate. | Yes            |

<table>
<thead>
<tr>
<th>Item Question</th>
<th>Council Responses</th>
<th></th>
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</table>
| 13.13 Council Response | It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.  
The Council has a duty to provide accommodation for the Gypsy/Traveller population. We do not have a duty to provide land for horses. The site will be owned by the Council and there is no intention to allow the occupants to keep horses on site. | No                  |

12/02/2014
### Representation Details

**Document:** Revised LDP, p.75, para.5.30  
**Policy:** General G&T  
**Summary:** Proposed new site at A449 and Tredegar House Caravan Park.

<table>
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<tr>
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<tr>
<td>5 6</td>
<td>Add a new site</td>
</tr>
<tr>
<td>7 7</td>
<td>Delete an existing site</td>
</tr>
</tbody>
</table>
| 8 8           | Candidate Site Name  
Land at Celtic Way Newport.                                                                                                                                                                                     |
| 10 10         | Soundness Test  
C1                                                                                                                                                                                                    |
| 11 11         | Representation  
3. There is an existing site at Tredegar park with all necessary facilities. The Council could rent the necessary pitches at considerably less cost.  
4. There is off the A449 a site, which was the preferred site, which owned by the council and already has most of the necessary infrastructure. The objection is apparently access via the sliproad. Since this is to be a transit site access will be limited and controlled. The objection seems to be without foundation.  
5. I would like to say more but I am apparently limited to 10 minutes. That frankly is not proper consultation. |
| 12 12         | Speaking at Public Examination  
H15 transit gypsy/traveller site at Celtic Way Coedkernew. Because the time allowed on this form is inadequate.                                                                                   |

### Council Responses

<table>
<thead>
<tr>
<th>Item Question</th>
<th>Council Responses</th>
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</table>
| 2 2           | Soundness of LDP  
No                                                                                                                                                                                                    |

**Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.**
### Representation Details

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<td>Herbert, Richard</td>
<td>Boyer Planning - Cardiff</td>
<td></td>
<td>26/07/2013</td>
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</table>

Document: Revised LDP, p.65
Policy: H01
Summary: Allocate land at Llwynhaid, Bettws for residential development.

**Item Question** | **Representation Text** | **Yes/No** |
--- | --- | --- |
3 | New Policy | Yes |
4 | A new paragraph or new text | Yes |
8 | Candidate Site Name | Llwynhaid, Bettws. |
1.0 Introduction

1.1 R A I Herbert objects to the omission of the land at Llwynhaid as a residential allocation from within Policy H1. The land concerned is shown on the attached plan.

1.2 Omission of this land from the housing allocations results in the Deposit Local Development Plan being unsound in terms of the following tests:

- **BC2** in that the housing allocations are not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales;

- **CE2** in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base in terms of future housing needs; and

- **CE4** in that omitting the site from the housing allocations does not provide a reasonable level of flexibility to allow the Deposit Plan to deal with a higher housing requirement to meet local needs.

2.0 Site Description

2.1 The irregular shaped 15.53ha site is situated to the southwest of Bettws, immediately adjoining the settlement boundary and existing urban edge. The site mainly comprises a number of fields as well as Llwynhaid farmyard containing farm sheds, a small stable block, and two traditional stone-built farmhouse buildings. The site is crossed by Henllys Lane and Bettws Brook in east/west direction and by Parc-y-Brain Road in a north/south direction.

2.2 To the north the site is bound by the existing residential development and associated infrastructure at Ogmore Crescent and Derwent Court, and the southern boundary is defined by the adjoining woodland which also forms part of the eastern and western boundary. The site is clearly contained by both physical and natural boundaries.

2.3 The site is located in close proximity to the centre of Bettws where there are a number of local shops, including Spar shop, post office, health centre, chemist, dental surgery and hairdresser. Furthermore, Monnow Primary School is approximately 400m away and Bettws Secondary School within 1.5km of the site. Bettws also has a number of sports grounds, playing fields and a leisure centre (active living centre).

2.4 Regular bus services, typically 20 minute frequency, to and from Newport running along Monnow Way are within 400 metres of the site.

3.0 Compliance with Deposit LDP

3.1 The acceptability of the site for inclusion within the housing allocations set out in Policy H1 and its compliance with the policy of the Deposit LDP are identified in separate submissions as briefly outlined below:

**Housing Requirement**

3.2 As detailed within the separate submissions made in relation to Policy H1 - Housing Sites there is clear need to provide further residential allocations. It is noted that due to concerns over deliverability of some of the proposed allocated sites as well as the requirement to meet local needs as set out within the Local Housing Market Assessment the housing land supply is inadequate to meet the identified 10,350 dwellings.

3.3 Therefore, it is evident that appropriate new housing allocation sites will be required to provide land which is immediately available and within a sustainable location. In this case the site at Llwynhaid would actively assist in providing a deliverable housing site to address the identified shortfall.

**Settlement Boundary**

3.4 As detailed within separate representations made on Policy SP5 - Countryside, it is wholly appropriate for the modest extension to the settlement boundary at Bettws. This extension will assist to accommodate additional housing development in order to provide a greater degree of flexibility within the plan to allow growth overall.

**Special Landscape Area**

3.5 Within separate representations made in relation to Policy SP8 - Special Landscape Area it is recommended that the site be removed from the North of Bettws Special Landscape Area and that the boundaries be revised given the sites characteristics and suitability for development.

4.0 Development Framework Document

4.1 In considering the above policies and in order to assist with establishing the most appropriate sites for further residential development a supporting Development Framework Document has been prepared for the site at Llwynhaid.
4.2 The Development Framework Document incorporates the results of a broad ranging assessment of environmental and other matters. It outlines the proposed development concept which responds to the assessments carried out and provides a masterplan to illustrate that the development of the site provides a logical choice for approximately 200 dwellings. It is therefore evident that the development of the site will seek to meet the housing need through the Development Plan period within the sustainable settlement location.

5.0 Required Change
5.1 That the land at Llwynhaid, Bettws is allocated for housing development within Policy H1 as a new site for 200 dwellings in order to meet the needs of the local community.

Item Question | Council Responses
---|---
12. Speaking at Public Examination | Yes

Item Question | Tick-box reply
---|---
12 2 Soundness of LDP | No

The response to comments made on Policy H1 Housing Provision can be viewed against representation 1117.L2.
Document: Revised LDP, p.65
Policy: H01
Summary: Inadequate housing supply therefore allocate land at Llwynhaid, Bettws for residential development.

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<th>Item</th>
<th>Question</th>
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<tbody>
<tr>
<td>3</td>
<td>New Policy</td>
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<tr>
<td>4</td>
<td>A new paragraph or new text</td>
<td>Yes</td>
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<tr>
<td>8</td>
<td>Candidate Site Name</td>
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Llwynhaid, Bettws.
### Representation Details

**by:** (No grouping)  
**Filtered to show:** (all of) Stage=L; Status=M  
**Rep'n/Para/Policy** | **Representor** | **Agent** | **Accession No** | **Date Lodged** | **Late?** | **Source** | **Type** | **Mode** | **Status** | **Status Modified**
---|---|---|---|---|---|---|---|---|---|---|
11 | Representation | | | | |

#### 1.0 Introduction

1.1 On behalf of R A I Herbert, we object to the approach taken by the Deposit LDP towards housing supply.

1.2 In the first instance, we welcome the Council's acceptance that the housing requirement must be considerably higher than envisaged in the previous Deposit version of the LDP. Indeed this represents a step change in the position at Newport and is important to the future economic and social well being of the City. This inevitably places a far greater emphasis on the delivery of sites for housing otherwise there will be far reaching implications for the City and its residents.

1.3 We are seriously concerned that whilst the requirement has significantly increased, the housing land supply has remained largely the same as within the earlier version of the LDP. Indeed, the strategy remains reliant upon dwellings being provided at sites that are subject to a range of constraints and have historically failed to deliver. PPW (9.2.3) is clear that "sites must be free, or readily freed, from planning, physical and ownership constraints, and economically feasible for development, so as to create and support sustainable communities where people want to live. There must be sufficient sites suitable for the full range of housing types."

1.4 We do not consider that the supply proposed complies with these fundamental requirements. Indeed, the failure of constrained sites to deliver would have significant consequences on the Local Area. Given that it is the Welsh Ministers main priority to deliver housing, it is our view that greater emphasis must be placed on ensuring a deliverable and implementable supply of land for housing rather than continued reliance upon sites that have remained undeveloped over successive plan periods.

1.5 Based on our consideration of the Plan in relation to National Policy requirements, it is our view that the proposed Focussed Changes made in relation to the above are contrary to the following tests of soundness:
- **C2**: in that the housing strategy is not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales. There is no flexibility to deal with the failure of sites to be brought forward for development;
- **CE1**: the proposed housing provision strategy and employment requirement does not flow logically from the proposed strategy of the plan and are not related to each other;
- **CE2**: in that the housing supply are not realistic and appropriate having considered the evidence;
- **CE4**: in that restricting the level of housing available during the plan period does not provide a reasonable level of flexibility to allow the Plan to deal with higher population, employment growth and household growth and to meet local needs.

#### 2.0 Land Supply Analysis

It is our view that there are numerous and significant weaknesses within the housing land supply that go to the heart of the Plan and render it unsound, in summary these are:

**Housing Land Supply**

In the first instance we draw attention to the under provision of housing during the UDP period (c. 360 dwellings) and secondly to the shortfall to date (April 2011 to April 2012 - 24 months) in the LDP period. Just 12 years into the LDP period based on these matters there is already a cumulative under provision of over 1,100 dwellings. Absent a significant source of readily available land for development it is likely that this level of under provision will increase as the same sites are relied upon for the LDP.

2.3 Given that the housing requirement has significantly increased and there are no material changes to the land supply position. If the 2012 JHLAS were re-run in the basis of the LDP requirement, then the land supply would decrease to less than five years.

**Sites subject to constraints**

We note that there are a number of sites that are subject to constraints yet are relied upon by the LDP. Indeed, these sites are vital to the delivery of the LDP but have been in the JHLAS for considerable time with no sign of development, some are categorised as 3(i) due to constraints, some are apartments for which there is limited demand and others are simply not viable for development. In addition there are a number of sites which are subject to the signing of a section 106 agreement which has constrained delivery for some time. We do not believe that these sites can be relied upon in order to contribute towards the housing requirement.

2.5 The following sites are examples of the inherent problems within the supply:

<table>
<thead>
<tr>
<th>Site</th>
<th>Details</th>
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<tbody>
<tr>
<td>1</td>
<td>Adjacent to Mcready's 54</td>
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</tbody>
</table>
2.6 We have serious concerns over the ability of the Llanwern site to be develop at the level envisaged within the plan (i.e. contributing over 2,748 dwellings during the plan period). Indeed, historically, there have been numerous delays that have continually postponed development and it is plainly not contributing the level envisaged in the latest JHLAS.

2.7 Indeed, we believe that based on present evidence if the overestimation persists, then the site will deliver at least 1,000 dwellings fewer than the level envisaged. This represents a major threat to the soundness of the plan.

Range and Choice
2.8 We note that National Guidance contained within PPW (5th Edition) requires that LDPs to provide a range of and mix of house types in places where people want to live. The present strategy is predicated upon large brownfield sites in and around the city centre and to the east of the City. This fails to consider the smaller scale needs of existing communities around the city and the desire of local people to continue to live within existing communities rather than as part of larger brownfield regeneration schemes in less attractive parts of the City.

Sites subject to s106
2.9 We do not consider that those sites that are subject to s106 can be relied upon to contribute during the plan period.

Windfall Allowance
2.10 There is presently reliance upon a significant number of windfall sites being brought forward. We note however, that a significantly number of the constrained land supply within the various tables are themselves windfall sites that have remained and subsequently become allocated but undeveloped. Accordingly, we believe that caution must be exercised in the contribution that such sites will make.

Flexibility allowance
2.11 Given the fundamental problems with the land supply identified and shortfall that it will result in, it is of fundamental importance that a flexibility allowance is identified. Indeed, in its present form the strategy lacks any flexibility to deal with the large number of constrained sites not being brought forward.

2.12 It is our view that in light of the significant problems identified, the contingency should be in line with the level of flexibility within the previous version of the LDP.

3.0 Consequences of failing to provide an adequate housing supply

3.1 As noted, the Strategy in its present form lacks any flexibility to deal with the failure of a small number of large sites to come forward. Given the known constraints and historic under-delivery, it is important that the sufficient housing is identified. Indeed, the consequences of the failure of the housing supply to meet requirements will be far reaching and undermine future aspirations for Newport.

3.2 Hardisty Jones Associates (HJA) have prepared an analysis on behalf of RA I Herbert on the consequences of the failure of the housing land supply to be realised. They have based their considerations on the Assessment of Housing Requirements report prepared by Nathaniel Licfield and Partners for Newport City Council.

3.3 Both the Newport Community Strategy and Local Housing Strategy set out an ambition to see Newport as a prosperous and thriving city. The Revised LDP has a vision of a lively, dynamic, growing City. The delivery of sufficient housing is central to achieving these visions in a sustainable manner, as set out within the LDP and the supporting NLP report (Assessment of Housing Requirements, February 2013, NLP). Indeed, the NLP report makes multiple references to the need to align housing and economic objectives in order to deliver and enable a sustainable and sound LDP, including:

"Alignment of housing and economic and policy objectives is essential to ensuring sustainable development and support for growth .......(alternative lower growth scenarios) .....fail to reflect the level of economic growth that is forecast and, as such, would compromise the deliverability of the economic vision for the area" [para 3.22, NLP].

"This consistency between employment and housing policies will be important in ensuring that the Plan can be found to be sound" [para 3.28, NLP].

"To achieve balanced and well-distributed growth economic policies must align with policies seeking the future development of houses in the area".[para 4.10, NLP]

3.4 Plainly the failure to deliver sufficient housing within Newport over the LDP period has implications for economic, social and environmental sustainability.

Economic Sustainability

3.5 Firstly, there will be a reduction in the scale of economic and employment growth achieved in Newport over the LDP period if lower levels of housing than planned are delivered. Paragraphs 1.18 and 1.27 of the Revised LDP note there is a direct relationship between job creation in the construction sector and the building of houses. Without sufficient activity there will be an impact on the potential to achieve 7,400 jobs over the plan period.

3.6 Secondly, on a more general level, there is an important relationship between the provision of housing, the growth of the workforce and the attraction and achievement of economic growth. As NLP note:

"....the delivery of sufficient housing for the (expanding) workforce represents an essential element in ensuring that economic growth can be attracted and sustained."[para 3.23, NLP]

3.7 Thirdly, and related to the second point above, there will be implications for the sustainable supply of labour without sufficient housing to attract and retain a population of working age. The NLP report highlighted the importance of positive net-migration to provide an appropriate demographic structure to support sustainable growth:

"Migration can be considerable benefit for the social and economic well-being of an area. It helps to ensure that the area benefits from a balanced mix of people of all age groups, including those of working age that are able to work within the local area. As suc, it can contribute towards a more balanced and economically functional society. It is important to acknowledge these benefits and to respond to them by making adequate provision for the future needs of migrants, including housing."[para 3.8, NLP]

"Taking account of the assumptions that have been made (and tested) regarding unemployment, economic activity and commuting, it is evident that if NCC is to deliver its growth aspirations then it will be essential to plan for and provide for net inward migration".[para 3.9, NLP].

3.8 In order to secure the economic ambitions of the LDP and wider policy and strategy documents for Newport there is a need to deliver sufficient housing.
Social Sustainability

3.9 There are two important elements of social sustainability related to housing provision.

3.10 Firstly, a failure to provide sufficient housing will hinder the formation of new households and/or limit the housing choices available to new households. This can happen in a number of ways. Directly, insufficient housing limits the number of households that can be accommodated in the city. Indirectly, it can lead to increases in house prices as demand outstrips supply, limiting access to housing that affordable. The implications will vary from case to case, but may force homebuyers to look further afield, away from friends and family and with commensurate implications on travel to work (see below), or may lead to households failing to form, for example young people in their twenties and thirties continuing to reside within the parental home. All of these outcomes have social implications and restrict opportunities.

3.11 Secondly, a lower provision of housing will impact upon the level of affordable housing that can be delivered in the city over the plan period. The Newport Community Strategy sets out a need to deliver affordable housing as part of its vision to ensure opportunities for all. This is set against an historic backlog in terms of affordable housing deliver, with the NLP report indicating a "significant unmet housing need in Newport" [para 3.33 bullet 6, NLP].

Environmental Sustainability

3.12 Without an adequate locally resident workforce employers will be reliant upon commuters to fill vacancies. This will put pressure on transport infrastructure and, given the ongoing reliance on the private motor car, is likely to lead to less environmentally sustainable outcomes. The NLP report states that:

"...if the housing requirement was set to reflect the demographic scenarios alone, then there is a risk that the housing and employment elements of the LDP would not be joined up and the economic growth that is anticipated would be reliant upon a substantial increase in commuting into the area, it it was to be achieved. Such an approach would not be sustainable and would raise fundamental questions regarding the soundness of the resultant strategy."[para 4.9, NLP]

3.19 In conclusion therefore it is vital that housing and employment is aligned in policy, and that in addition, housing is delivered in order to enable the sustainable economic growth that is so necessary. Indeed, this similar conclusion is reached by NLP in its advice to the Council:

"Alignment of housing and the economy is therefore essential to ensuring sustainable development and support for growth.....the delivery of sufficient housing for the (expanding) workforce is essential to ensuring that economic growth can be attracted and sustained \[para 4.11, NLP\]

4.0 Required Change

4.1 It is considered that to make the plan sound additional land will be required to be identified for housing. To that extent the land at Llwynhaid, Bettws is considered acceptable to accommodate some of the required shortfall. It is readily available, free from constraints and related to an existing sustainable community where people want to live.

4.2 The supporting Development Framework Document which has been prepared in relation to Llwynhaid has summarised the technical reports and information which has been prepared to support the allocation as a logical choice for housing for approximately 200 dwellings.

4.3 It is evident from the assessments undertaken as part of the Development Framework Document and the separate submissions made to the Deposit LDP in regards to Policy SP5 - Countryside, H1 - Housing Site (Allocation) and SP8 - Special Landscape Areas, that there are no overriding constraints to the development of the site. Furthermore given that the site is without contamination issues and large infrastructure requirements it is immediately available and would assist Newport in providing short term sites to provide for Newport's immediate housing needs as detailed above.

4.4 Taking this into consideration an appropriate masterplan has been prepared as part of the Development Framework Document to illustrate the development opportunities and benefits which can arise and to demonstrate that an allocation at Llwynhaid within the settlement of Bettws is deliverable. In this regard the allocation at Llwynhaid will assist in providing certainty over deliverability and housing supply within the plan period together with alternative range and choice.

5.0 Conclusion

5.1 In the first instance, we welcome the significant progress taken by Newport Council in recognising that there is a need to establish a significant housing requirement and the benefits that this can bring. However, we believe that the supply in inherently problematic and is not capable of delivering the level of housing required.
5.2 The housing land supply is inadequate to meet the identified 10,350 dwellings. We have a number of significant concerns:
1. There is already a cumulative under provision of housing amounting to over 1,100 houses in the first 18 months of the LDP period and including the shortfall from the UDP;
2. The sites identified as being available during the plan period will not deliver the necessary completions. Many have been around for some considerable time and are subject to constraints that there is no indication can be overcome;
3. The estimation of delivery at Llanwern is significantly overstated when based on historic delays, constraints and progress to date;
4. An element of supply is subject to S106 agreements being signed. Given the already significant delays such sites cannot be robustly considered to be deliverable.
5. There is no flexibility allowance for non-implementation which is likely to be a significant problem.

5.3 It is considered that additional readily available housing sites will be required for development. As such, land at Llwynhaid should be allocated for development.

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Speaking at Public Examination

Due to the significant issues raised in the attached representations.

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<th>Council Responses</th>
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12/02/2014
Support for the growth strategy noted.

Justification of Requirement

Following representations at the Deposit LDP stage the housing requirement figure has been justified and increased from the proposed Welsh Government Population projections. There is scope for an authority to deviate from the WG population projections but this deviation is required to be well evidenced. The NLP assessment sets out this evidence base and illustrates that Newport, as one of the few areas in Wales with an anticipated population increase noted in the Census, is set to grow and reflects the Council’s policy aspiration for growth. It should be recognised that the majority of the sites (46 of 55) have planning permission or permission subject to a Section 106 agreement. There is scope for an authority to deviate from the WG population projections but this deviation is required to be well evidenced. The NLP assessment sets out this evidence base and illustrates that Newport, as one of the few areas in Wales with an anticipated population increase noted in the Census, is set to grow and reflects the Council’s policy aspiration for growth.

As noted above, the Plan identifies its housing requirement for the plan period based on an assessment of need and this is also true of its employment land requirements. The clear strategy for the Plan is for growth and it will be through the successful implementation of the policies of the Plan that this will be achieved. There is a clear link between housing supply and economic growth which is why the supply will be monitored annually.

Reliance on previous Development Plan sites

The Local Development Plan does have a number of housing sites which were identified within the Unitary Development Plan. In total there are 15 of the 55 housing sites which continue into the new plan. The majority of these sites have progressed significantly from the UDP, as noted below:

1. Land adj. McReadys. As of 1st April 2013 the developer is on site preparing the site for development.
2. Eastern Expansion Area. Planning permission has been granted with a signed Section 106 agreement. Gallagher Estates have confirmed through the JHLAS process that they will be delivering units on site in 2015.
3. Glebelands. This site has an extant planning permission associated with the school site adjacent to the residential area. The land has recently been sold to a developer.
4. Monmouthshire Bank Sidings. Redrow are on site and progressing.
5. Traston Lane. The site has planning permission and the agent has confirmed that they anticipate development on the site in 2015.
6. Pirelli. This site has been sold to the Seren Group (RSL) who launched the development in September 2013.
7. Ty Du Works. An application is being considered by the Council for a new scheme on the site.
8. Farmwood Close. This is an historic site with a LDC for the implementation of 10 units which have not been completed. The land is currently being marketed.
9. City Vision. The developer is on site and progressing.
10. Trinity View. The developer is on site and progressing.
11. Glan Llyn. The developer is on site and progressing. A third developer (St Modwen) are anticipating to begin work on Phase 2 in 2015.
12. Mill Street. The site is owned by NCC who will market the site.
13. Herbert Road. This site is adjacent to the Glebeland site noted above. The site is compliant with the overall strategy of the LDP being a brownfield urban site in need of regeneration. There is no application on the site but the area land owner notes their intention to sell the site for development. 14. Whitehead Works. This site is part of a Welsh Government regeneration scheme, which anticipates delivery to begin in 2016.
15. Bideford Road. This site is compliant with the overall strategy of the LDP being a brownfield urban site with potential for regeneration. There is no application on the site but the area is the remaining part of a housing estate development.

The information above clearly shows that although there are a number of sites which have continued from one development plan to the other they have in the main progressed significantly or that they will be delivered within the plan period. It is also important to note that it was made clear through the UDP process that the growth proposed in the east of the city (i.e. Glan Llyn and Llanwern Village) was not anticipated to be delivered wholly within the UDP plan period.

Delivery in the east

Nonetheless the development rate anticipated over the plan period for the large housing development at Glan Llyn, is based on an annual review through the Joint Housing Land Availability Study (JHLAS) as required by National Planning Policy. The rates are considered appropriate and have been jointly agreed with the JHLAS study group which includes the development industry.

The Plan sets out the anticipated rate of delivery in Chapter 13 which illustrates that the total number of units is set to be delivered across the plan period. This in turn is established yearly through the...
Joint Housing Land Availability Study and monitored annually within the AMR. The effects of the economic recessions are still being felt within the housing market so it is therefore of no surprise that the plan anticipates a lower growth in the first period of the plan compared to the final ten years.

Deliverability and Supply
The Plan does however provide enough land to ensure that a 5 year supply is met and, that although the annual build rate is higher than currently achieved, even when taking into account the residual method of calculation the Council has provided an adequate supply of land which has been agreed with the industry through the JHLAS process. In terms of Residual need it should be noted that the assessment of residential need takes into account the period 2011-2026. This takes into account the need of that period which would include the backlog from pre 2011 the proposed figures would result in double counting. It should also be noted that the residual method of calculation for the housing land supply will only be required to take into account those units not completed from 2011 onwards e.g. any provision under the required 690 units pa. It is also useful to note that sites subject to the signing of a section 106 will not be considered within the calculation of the 5 year land supply as noted in TAN1. It is useful to note that such sites have been deemed appropriate for development by the Council having been permitted planning permission subject to a legal agreement, therefore they have been identified within the plan as sites which are compliant with the plans strategy and are considered to be deliverable within the plan period.

As illustrated above the perception that the Plan is overly reliant on sites inherited from the UDP period is not well founded. In addition a number of the sites outlined by the developer as being undeliverable are in fact progressing e.g. Alcan. Not all the sites noted are counted as part of the housing supply due to the lack of evidence of deliverability e.g. Newport Athletic Club. The Council has been realistic in its approach to the housing supply set out in the Plan which is based on the annual JHLAS process to ensure that the sites can be delivered to ensure the strategy is met.

The rate of windfall sites is also questioned and as noted in Planning Policy Wales there is a need to consider the supply from such sites. The LDP based its figures on a review of the past trend of windfall supply which has been drastically cut to reflect the need for the Plan to remain flexible whilst concentrating growth on allocated housing sites and tight settlement boundaries. The plan will be monitored as to the percentage of houses developed on allocated housing sites to ensure that the housing policies of the plan are being effectively implemented.

Range and Choice
The supply of housing is considered to provide for a clear range and choice of housing which is a clear concern for many representors. The housing sites within the Plan are located across the City, with a clear focus on regeneration in the east as per the established strategy. The Plan provides a supply of affordable units for a mixture of needs as well as providing a mix of family homes and inner city living to cater for the broad housing market. The opportunity to provide homes in more rural locations has been investigated and there was no clear evidence to justify expansion to existing settlements. The Plan therefore has provided the opportunity for exception sites where such justification can be produced.

Flexibility
As the representation notes there is no set flexibility figure required for housing supply within development plans. However, during the examination of the Brecon Beacons National Park LDP WG noted a notional figure of 10% but that needed to reflect local circumstances. Other authorities within South East Wales have a range of 12-20% flexibility. It is good practice to allow for unknowns and the need for flexibility within a development plan is inherent from National Planning Policy. In Newport’s case the majority of the housing supply has planning permission or is being progressed. Those remaining 9 sites without planning permission are in line with the overall strategy or regeneration needs of the plan. Together they provide a 12% oversupply which is considered appropriate to enable to plan to cope with uncertainties that may arise over the plan period.

Strategy compliance and delivery.
It is considered that the plan provides a more than adequate supply of housing, both market and affordable, which is both deliverable and viable. Many of the sites have progressed since the Revised Deposit Plan was written and there is a steady supply of housing being achieved across Newport. The Plan identifies its housing and employment land supply for the plan period based on an assessment of need. The clear strategy for the Plan is for growth and it will be through the successful implementation of the policies of the Plan that this will be achieved. There is a clear link between housing supply and economic growth which is why the supply will be monitored annually.

The site at Llwynhaid Farm is a Greenfield site in the open countryside, with the Malpas Brook SINC running through the site. The western edge of the site forms part of Special Landscape Area 1 – North of Bettws, having scored as an area of high value in LANDMAP assessment. Allocation of this site would therefore be contrary to the Council’s objective to make sustainable use of land. The plan seeks to promote the reuse of Brownfield sites in preference to extensive use of Greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities.

Furthermore, additional housing land on a Greenfield site in the countryside is not needed to meet the housing requirement. The forecast housing need has been assessed in the context of population and employment projections and current market realities. The plan allocates more than sufficient land to meet this requirement. Additional housing allocations in a rural location cannot therefore be justified. Furthermore, the release of the site for housing would be contrary to the Council’s strategy of accommodating growth in Newport within the urban area and within the defined Eastern
Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

It is recommended that this site is not included in the Local Development Plan.
### Representation Details

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Additional material submitted

Document: Revised LDP, p.22

Policy: SP08

Summary: Remove land at Llwynhaid, Bettws from the SLA boundary.

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1.0 Introduction

1.1 R A I Herbert objects to the inclusion of land at The Griffin within the Trdegar Park Special Landscape Area designation. The land concerned is shown on the attached plan.

1.2 Inclusion of this land within the Tredegar Park Special Landscape Area results in the Deposit Local Development Plan being unsound in terms of the following tests:

- CE1 the proposed Special Landscape Areas do not provide a coherent approach to designation;
- CE2 in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base; and
- CE4 in that the Special Landscape Area does not provide a reasonable level of flexibility to allow the plan to deal with future circumstances.

2.0 Amplification

LANDMAP Designation

2.1 In terms of the evidence base for the designation of the Special Landscape Area (SLA) as referred to in the Deposit Plan there are a number of issues which need to be addressed.

2.2 Firstly the use of the LANDMAP information system in determining potential SLAs within Newport is driven by Planning Policy Wales (2012 5th Ed) in which paragraph 5.3.13 states that LANDMAP "...can help to inform supplementary planning guidance on landscape assessment (covering for example, local distinctiveness, special landscape areas and design)".

2.3 However, in reviewing the SLA Background Paper it is evident that the LANDMAP data appears to have been the main justification for the recommended location, extent and boundaries of the proposed SLAs. Whilst Planning Policy Wales states that the data should 'help to inform' supplementary planning guidance, in the case of the proposed Newport SLAs the Authority have relied upon the data rather than be informed by it.

2.4 In considering the above it is questioned as to whether all landscapes within the proposed designated areas are worthy of equal protection. One of the strategic criteria and tests for SLA designation stated in LANDMAP Information Guidance Note 1 is 'coherence'. This is taken to mean that the boundaries of proposed SLAs should contain within them landscapes of distinctive unit exhibiting characteristics worthy of protection by virtue of their special qualities, distinctive features or rarity. It is therefore unclear as to how the test for coherence, as required in the guidance, can be satisfied across the relatively large land areas covered by the SLAs.

2.5 Concern is also raised in relation to the definition of boundaries. The TACP Report - Designation of Special Landscape Areas (2009), which is appended to the Background Paper, highlighted the need for the subsequent confirmation of the detailed boundaries by the Authority.

2.6 In this regard paragraph 5.2 of the SLA Background Paper states that "The proposed SLA boundaries for the LDP are justified as being located wither: along Newport Authority’s administrative boundary, the proposed settlement boundary from the LDP or along structures, such as motorways, railways, rivers or canals, the edges of large woodlands or hedgerows. This ensures a consistent and clearly defined boundary line which will ensure future use of the allocation is unambiguous".

2.7 However, whilst some further work has been undertaken it is evident that in order to provide a consistent approach the Authority have defaulted to the use of the settlement boundaries. While in some instances edge of settlement may be justified as the boundary in special landscape terms, in the majority of cases, it appears to be used without regard to landscape quality and adjoining influences.

2.8 We consider that far more scrutiny of SLA boundaries is needed to exclude those landscapes that lack special qualities, distinctive features or rarity, and to re-draw the boundaries as so to include only those landscapes worthy of protection by virtue of their special status.

3.0 Special Landscape Area Boundary

3.1 Given the above comments on the LANDMAP assessment and subsequent definition of the boundaries proposed by the Authority it is also important to highlight that although only the northern section of the site located within the the North of Bettws Special Landscape Area. It is also the area which adjoins the settlement boundary of Bettws at Ogmore Crescent and Derwent Court to the north and is subject to urban and human influences including residential dwellings, parking areas, garages and public footpaths.

3.2 In considering the site characteristics it is evident that a more detailed assessment of the boundaries should be undertaken rather than default to the settlement boundary. This is particularly relevant given that as part of the Newport UDP Inquiry it was recommended by the Inspector that the Special Landscape Area in which the site is located should be deleted as insufficient information had been provided.
3.3 It was also agreed by the UDP Inspector previously that the site is well contained both physically and visually. Within the UDP Inspector's Report it was highlighted that the site itself is not widely visible and in the limited local views in which it features it is seen in the context of the built up area of Bettws. It is therefore considered that the site is located with a clearly defensible boundary and should form logical settlement extension.

3.4 Further details relating to the site characteristics are provided within the supporting Development Framework Document which illustrates the acceptability of the site for residential development.

4.0 Required Change
4.1 That the site at Llwynhaid be removed from the North of Bettws Special Landscape Area.

12 Speaking at Public Examination
Due to the significant issues raised in the attached representations.

Item Question: Soundness of LDP
Tick-box reply: No

Council Response
No change. The designation of Special Landscape Areas was assessed using the Landmap information system, as referenced in PPW, which is the data set used in the overall assessment undertaken using the Special Landscape Area Designation Criteria included within Natural Resources Wales' guidance. The Local Authority did refine the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken; this included roads, hedgerow as well as settlement boundaries. This work looked at the proposed SLAs identified by the assessment of the Landmap data and did not seek to amend this nationally consistent data set. The area at Llwynhaid Farm is allocated as part of the SLA 1 North of Bettws and this is based on the overall value of the landscape taking into account its qualities and features which have been deemed worthy of designation.

The site is a Greenfield site in the open countryside, with the Malpas Brook SINC running through the site. The western edge of the site forms part of Special Landscape Area 1 – North of Bettws, having scored as an area of high value in LANDMAP assessment. Allocation of this site would therefore be contrary to the Council's objective to make sustainable use of land. The plan seeks to promote the reuse of Brownfield sites in preference to extensive use of Greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities.

Furthermore, additional housing land on a Greenfield site in the countryside is not needed to meet the housing requirement. The forecast housing need has been assessed in the context of population and employment projections and current market realities. The plan allocates more than sufficient land to meet this requirement. Additional housing allocations in a rural location cannot therefore be justified. Furthermore, the release of the site for housing would be contrary to the Council's strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council's strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

It is recommended that this amendment to the special landscape area is not included in the Local Development Plan.
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1.0 Introduction

1.1 R A I Herbert objects to the inclusion of land at Llwnhaid within the Countryside and the omission from within the settlement boundary of Bettws. The land concerned is shown on the attached plan.

1.2 Omission of this land from the settlement boundary results in the Deposit Local Development Plan being unsound in terms of the following tests:
- C2 in that the settlement boundary is not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales;
- CE2 in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base in terms of future housing needs; and
- CE4 in that the restrictive settlement boundary does not provide a reasonable level of flexibility to allow the plan to deal with future circumstances.

2.0 Amplification Housing Requirement

2.1 As detailed within the separate submission made in relation to Policy H1 - Housing Sites there is clear need to provide further residential allocations. It is noted that due to concerns over deliverability of some of the proposed allocated sites as well as the requirement to meet local needs as set out within the Local Housing Market Assessment the housing land supply is inadequate to meet the identified 10,350 dwellings.

2.2 Therefore, it is evident that appropriate new housing allocation site will be required to provide land which is immediately available and within a sustainable location. In this case the revision to the settlement boundary at Rogerstone to incorporate the site at Llwynhaid would actively assist in providing a deliverable housing site to address the identified shortfall.

Planning Policy Wales

2.3 In the context of the requirement for additional housing sites it is evident that there is a need to allow greater flexibility with the settlement boundary and seek to allocate further housing sites at appropriate locations.

2.4 As part of a sound plan, local Planning Authorities, in identifying sites to be allocated for housing should have regard to the principles of the search sequence as outlined within Paragraph 9.2.8 of Planning Policy Wales (2012 5th Ed). The paragraph outlines that Authorities should start with the reuse of previously developed land and buildings within settlements, then settlement extensions and then new development around settlements with good public transport links.

2.5 Given that a number of the existing allocated sites are on previously developed land and are constrained the Authority should seek to allocate sites within logical settlement extensions as per the next stage within the search sequence.

2.6 In doing so regard should be had to paragraph 9.2.9 of PPW which provides relevant criteria which Local Planning Authorities should consider in deciding which sites to allocate for housing.

2.7 The characteristics and locations of the site at Llwynhaid accords with the relevant criteria in order to provide a sustainable settlement extension:
- The site immediately adjoins the settlement boundary of Bettws and is subject to urban influences;
- The extension of the settlement to provide residential development would wholly compatible with the neighbouring established land uses;
- Development of the site is not constrained by physical or environmental issues;
- The site is accessible to jobs, shops and services by modes other than the car, and
- The site is located where the capacity of existing and potential infrastructure, including public transport, water and sewerage, other utilities and social infrastructure, are available.

2.8 The principles and criteria as set out in Planning Policy Wales have been taken into consideration with the preparation of a Development Framework Document.

3.0 Development Framework Document

3.1 In order to assist with establishing the most appropriate settlement extension sites a Development Framework Document to support the site at Llwynhaid as a housing allocation site and the consequent inclusion within the settlement boundary of Bettws has been prepared.

3.2 The Development Framework Document incorporates the results of a broad ranging assessment of environmental and other matters. It outlines the proposed development concept which responds to the assessments carried out and provides a masterplan to illustrate that the development of the site can contribute to meeting the housing need through the Development Plan period within the sustainable settlement location.
4.0 Required Change
4.1 That the site at Llwynhaid be removed from the Countryside and the settlement boundary for Bettws be amended to include land to the as shown on the attached plan.

Due to the significant issues raised in the representation.

Item Question
12 12 Speaking at Public Examination

Tick-box reply
Yes

Item Question
2 2 Soundness of LDP

No

Item Question
13 13 Council Response

No change. The forecast housing need has been assessed in the context of population and employment projections and current market realities. The plan allocates more than sufficient land to meet this requirement. Additional housing allocations in a rural locations cannot therefore be justified. Furthermore, the release of the site for housing would be contrary to the Council’s strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

The plan seeks to promote the reuse of Brownfield sites in preference to extensive use of Greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities. The plan clearly reflects this preference but it should be noted that there are a limited number of allocations on Greenfield sites within the plan.

The site is a Greenfield site in the open countryside, with the Malpas Brook SINC running through the site. The western edge of the site forms part of a proposed Special Landscape Area – North of Bettws, having scored as an area of high value in LANDMAP assessment. Allocation of this site would therefore be contrary to the Council’s objective to make sustainable use of land.

A background paper ‘Delivery and Implementation’ has been produced to expand on the information supplied in Chapter 13 of the Deposit LDP. This sets out the proposed phasing, constraints and infrastructure requirements for each allocation. The Delivery of each site is considered here, setting out the justification for its continuation in the plan based on evidence from developers and landowners. Some of the large brownfield sites allocated within the previous Unitary Development Plan have started construction e.g. Glan Llyn with 4000 homes and employment uses on the site. The impact on development by the economic recession is to be considered and the plan takes a long term view across the entire plan period.

The LDP sets out a strategy for growth which allocates an adequate supply of land for residential and employment uses. The supply of this land is not concentrated in one area but across the City. It is recognised that growth in the east is significant but the west has not been overlooked with large brownfield sites allocated at Novelis, former Whitehead Works and Monmouthshire Bank Sidings. The review of village boundaries has clearly considered the need for expansion in these areas and following their assessment boundaries have been tightened and allocations resisted due to the unsuitability of sites proposed in these unsustainable locations.

It is recommended that this site is not included in the Local Development Plan and the countryside designation remains.
Item Question | Representation Text
--- | ---
4.4 | A new paragraph or new text | Yes

11.11 Representation

1.0 Introduction
1.1 R A I Herbert and Mr & Mrs G Goldsworthy are satisfied that the previous allocation of a permanent Gypsy and Traveller site at Yew Tree Cottage, Bettws has been removed and support the proposed new allocation at Hartridge Farm Road, Ringland.

2.0 Amplification
2.1 In the previous response it was suggested that Gypsy and Traveller Residential Accommodation should be within a suitable and sustainable location. It was also stated that when assessing the location of Gypsy and Traveller sites regard should be had to the guidance contained within WAG Circular 30/2007 - Planning for Gypsy and Traveller Caravan Sites. Paragraph 20 outlines that "In deciding where to provide for Gypsy and Traveller sites, local planning authorities should first consider locations in or near existing settlements with access to local services e.g. shops, doctors, schools, employment, leisure and recreation opportunities, churches and other religious establishments."

2.3 It is positive to see that the above guidance has been reflected in the proposed permanent site at Hartridge Farm Road, Ringland which is in a sustainable and suitable location within the settlement boundary. The sustainability credentials of the site are reflected in the fact that the site was allocated for housing site under Policy H1(57) in the previous version of the Deposit LDP.

2.4 Some concern is still raised in relation to the use of the former Ringland Allotments as a contingency site. The reasons being that the site is greenfield and within Newport's UDP is partly designated as Allotments and Countryside, and within the initial Deposit LDP the whole site is identified within the Countryside. The site is situated outside the established residential settlement boundary with many vehicular access issues. Also there is a pylon situated on site that will need a buffer zone. Another constraint that the site would need is noise attenuation due to the positioning of the site adjacent to Ringland Way.

2.5 Whilst it is not a proposed permanent site these issues will need careful consideration.

3.0 Required Change
3.1 No change.

Item Question | Council Responses
--- | ---
Support for the Hartridge Farm Road site is noted. With regards to the Former Ringland Allotments site, there are no allotments on the site. Alternative allotment provision can be investigated if it is demonstrated there is insufficient allotment provision across Newport as a whole.

The site is adjacent to the settlement boundary and considered to be a reasonably sustainable location. More remote locations that are further outside of the settlement boundary have poorer access to amenities and place more of an emphasis on car travel, therefore deemed to be more unsustainable.

Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.
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**1.0 Introduction**

1.1 R.E. Phillips & Partners note the current community facilities policy, though suggest that in appropriate circumstances provision could be provided outside of the settlement boundary and still be considered a sustainable location.

**2.0 Amplification**

2.1 The general principle of the provision of new community facilities is supported. However, it should be made clear within the policy that in certain instances the provision of appropriate community facilities could be accommodated outside of the settlement boundary. This would allow for a greater use of space to provide facilities and also to locate those that may not be appropriate in close proximity to existing development. Not having to compete in value terms for land within the urban area might also be a determining factor in the affordability of such a scheme where funds are restricted or the scheme is reliant on donation and cannot compete with other high value generating uses.

**Required Change**

That the policy and supporting text be amended to reflect the fact that community facilities would be acceptable outside of the settlement boundary.

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**13 13 Council Response**

The wording of the policy (e.g. ‘encouraged’ and ‘should’) provides a degree of flexibility. Applications for community facilities outside the settlement boundary (or a village boundary) would be assessed on their individual merits. There is no clear need to revise the policy.
### Representation Details

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<td>Summary:</td>
<td>Delete the District Centre allocation at Newport Retail Park District Centre.</td>
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C1, C2 and CE2.
Section 8: Retailing and the City Centre

Our client strongly objects to the designation of Newport Retail Park as a District Centre. This shopping park provides a traditional out-of-centre retail park format with large amounts of car parking and stores with large footprints. We do not consider that this retail park meets the characteristics of District Centre.

Newport Retail Park provides a range of comparison shopping facilities, along with a large Tesco Extra supermarket. The site provides hundreds of free car parking spaces and is intended predominantly for car-borne shoppers.

TAN4 defines a District Centre as being:

"Groups of shops, separate from the town centre, usually containing at least one food supermarkets or superstore and non-retail services such as banks, building societies and restaurants."

The stores at Newport Retail Park include a PC World, Next, Asda Living, Outfit (incorporating Burton, Miss Selfridge, Wallis, Evans, Principles, Warehouse and Dorothy Perkins) and Sports Direct. These shops do not offer the type of goods which people require on a day-to-day basis. The retail park does not include the types of facility that would normally be expected to meet local shopping needs, such as a post office, bank/building society or florist.

In addition to not offering the types of facilities and services that we would normally expect in a District Centre, we also consider that the retail park has expanded beyond what is appropriate for a District Centre. We note from the Council's District Centres Background Paper (June 2013) that the gross retail floorspace at the Retail Park is 32,246 sq.m. This is equivalent to about 73% of the Newport City Centre.

Paragraph 8.21 of the Revised Deposit Plan states that further development of the District Centre will pose a threat to the viability and vitality of the City Centre. We note that Policy R6 of the April 2012 Deposit Plan sought to restrict additional sales floorspace at the retail park. Our previous representations stated that we considered this policy approach, to restrict retail floorspace within a District Centre, to be fundamentally unsound and that accordingly the District Centre status should be removed and all facilities considered as being out-of-centre.

Whilst Policy R6 has been removed from the Revised Deposit Plan, the principles of this Policy are incorporated within Policy R7.

Accordingly, we consider this Policy and the District Centre allocation to be fundamentally unsound and fail the C1, C2 and CE2 tests of soundness for the following reasons:

- The designation of the retail park as a District Centre does not have regard to other strategies relating to the protection of the vitality and viability of the city centre.
- The designation of the retail park as a District Centre does not have regard to the definition of District Centre provided in TAN 4.
- The District Centre allocation and Policy R7 are not realistic or appropriate for the reasons given above.

As such, the retail park should be redefined as an out-of-centre retail park whereby the retail policy tests of Planning Policy Wales, relating to need, impact and sequential test, can apply to further protect the vitality and viability of Newport City Centre.

I trust that the above is helpful and I would be grateful if you could ensure that Peacock and Smith remain on the consultation database on behalf of Morrisons to be informed of the outcome of this consultation stage.
Boundary

The preparation of the Local Development Plan (LDP) is an appropriate time to review boundaries defined in the Plan. Accordingly a review of all district centres allocated in the Adopted Unitary Development Plan has been undertaken for the preparation of the LDP. The definition of a boundary for Newport Retail Park District Centre within the LDP is of particular importance as the UDP does not define a boundary, with the East Newport Development Framework Supplementary Planning Guidance and appeals decisions forming the basis of a boundary. The defined boundary in the Revised Deposit LDP seeks to reasonably provide Newport Retail Park District Centre with a defensible boundary for Development Management purposes and give certainty to future investors, developers and officers in terms of defining the retail centre on a clear and adopted Plan, confirming its position in the retail hierarchy for the application of the sequential test and implementation of retail planning policy, and reflecting its role as a district centre to serve the eastern catchment area.

It is not considered appropriate to make Newport Retail Park and out-of-centre location by deallocating it as a District Centre. Newport Retail Park has an important role to play as a District Centre for the Eastern Expansion Area. At present, however, the Park’s floorspace is equivalent to 75% of the City Centre’s floorspace, and it is clearly exceeding its District Centre role and having an adverse impact on the vitality and viability of the City Centre. The Council seeks to define a boundary for Newport Retail Park which is appropriate to its function and will provide greater control over its growth.

Separate Policy Approach

A separate policy approach to NRP is considered justified and in accordance with PPW (5th ed, Nov 2012) which notes that development plans should establish existing hierarchy of centres and be clear about their future roles (10.2.1). Within this context Policy R7 has been prepared as the Council considers Newport Retail Park District Centre to be different to its other district centres and to have greater potential to have an impact on the City Centre. This is supported by the findings of the Colliers Retail Study and Assessment (July 2010). The Study notes that 55% of Newport’s occupied retail floorspace in district centres is at Newport Retail Park District Centre. The Centre’s potential to compete with the City Centre is also acknowledged at paragraph 8.25. Notwithstanding, the district centre allocation, the Collier’s Study recommends a number of policy restrictions that should be considered for Newport Retail Park District Centre (para 8.30 – 8.39). Policy R7 seeks to incorporate these recommendations in a way that allows retail development that is appropriate in scale to a district centre and does not impact on the vitality and viability of the City Centre.

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**Document:** Revised LDP, p.22  
**Policy:** SP08  
**Summary:** Extend Special Landscape Area to the north of Langstone.

**Item Question**  
**Representation Text**

11  
Thank you for making me aware of the revisions to the above plan.

The plan would be improved by protecting Langstone village from further major development by adding the countryside north of the A48 that is outside the boundary settlement up to and including Old Roman Road and designate it as a ‘Special Landscaped Area’.

**Item Question**  
**Council Responses**

13  
No change. The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales’ guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.
Having been made aware of the revisions to the above plan and in particular reference to the location of the Gypsy and Traveler sites as set out in the plan, is acceptable, and I accept and approve the Revised Deposit Local Development Plan.

Support noted.
### Item Question  Council Responses

13  13  Council Response

The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales' guidance.

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### Representation Details

**by:** (No grouping)

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Document: Revised LDP, p.75

**Policy:** General G&T

**Summary:** Support for the Gypsy and Traveller Sites

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**Item Question**

**Representation Text**

> Having been made aware of the revisions to the above plan and in particular reference to the location of the Gypsy and Traveler sites as set out in the plan, is acceptable, and I accept and approve the Revised Deposit Local Development Plan.

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**Item Question**

**Council Responses**

> Support noted.
Representation Details

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1396.L2/SP08 Atwell, Mrs Carole Additional material submitted - Please click here
06/08/2013 E O M
Document: Revised LDP, p.22
Policy: SP08
Summary: Designation of SLA at Langstone

11 11 Representation
However, further improvement could be made to the Plan in protecting Langstone Village from further major development by adding the Countryside north of the A48 that is outside of the boundary settlement, up to and including Old Roman Road, and designate it as a ‘Special Landscaped Area’.

The fields and extended woodlands to the countryside north of the A48 within Langstone Village and between the existing settlement boundaries, are a fine example and illustration of how farming and conservation of the natural countryside enhance the landscape.

I attach photographs to illustrate the point and request that you further consider paragraph 2 for its inclusion to the LDP.

13 13 Council Response
The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales’ guidance.

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**Document:** Revised LDP, p.65

**Policy:** H01

**Map:** Proposals East: Proposals Plan B East

**Summary:** Propose new site at Langstone to overcome the short term need.

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CE1, CE2, CE4, C1, C2, C3

[Additional material submitted - Please click here](#)

SA/SEA submitted
On behalf of my clients, Messrs Duthie, Lewis and Neal, the owners of the land shown in the attached plan, I wish to point out that the Revised LDP is unsound and needs to be changed.

The first of the Assembly Government objectives for housing is:
"to provide more housing of the right type and offer more choice"

Furthermore, the Assembly Government will seek to ensure that:
"the overall result of new housing development in villages, towns or edge of settlement is a mix of affordable and market housing that retains, and, where possible enhances important landscape and wildlife features in the development."

As openly indicated in the Revised Deposit Plan, the supply of housing land is focussed on brownfield sites and includes many of the sites that were included in the previous UDP. Indeed, several of the sites have had permissions for many years and seem no nearer to development now. There appears to be a complacent attitude that few more sites need to be allocated, even though the end date for the Plan is 2026. Such a strategy is flawed because it provides insufficient choice, range and variety of sites with flexibility to deal with changing circumstances.

Also, National Government emphasises the need to make up the shortfall in affordable housing provision. The dependence on brownfield sites, where development costs are higher, is in danger of not producing the required affordable housing provision because of the threat to the viability of development.

While the Assembly Government encourages housing development on mainly brownfield sites within urban areas, it does not require housing allocations to be almost exclusively on such sites, accepting that some greenfield development is necessary to provide a balance of development opportunities reflecting choice, range and variety. The Revised Deposit Plan provides for it housing sites to be concentrated within the urban boundaries of the City with few opportunities beyond the City Boundaries. In particular, there are no new allocations within Langstone, even though the village has shown the capacity to absorb new development and has been provided with new employment opportunities during the past decade.

The last published Joint Housing Land Availability Study shows the City to have land available to provide a 7.0 year land supply when set against the UDP requirements. This figure is based upon build rates during the past 10 years but the rates were constrained by insufficient range of sites available for early development and poor economic climate. The Council's current Revised Deposit Plan strategy is likely to suffer the same problems.

The Study showed that only 26% of the dwelling units available were likely to be built within the 5 years whereas over 74% would not become available until after the first 5 years. With the Council's additional allocations these are unlikely to address the need for a range of sites available for development early in the Plan period to kick-start the local and national economy.

National Government requires a 5 year supply of available housing land and where there is a shortfall, the local planning authority is required to address it. The revised Deposit Plan does little to address the short-term availability of land, nor does it address the requirement for a choice, range and variety of sites with flexibility to deal with changes in circumstances.

The Plan would be made more sound with a modest allocation of greenfield sites which would address the above mentioned deficiencies. One such allocation would be that identified in the attached plan. Langstone is well located on the main eastern approach to the City and has had infrastructure and employment improvements over the past decade. The Coldra roundabout has had major improvements to improve its capacity and further development in Langstone will enhance the City's housing supply. There is and always has been a high demand for housing there and the village has a reasonable local infrastructure with close connections to the more urban City area. There are good public transport links with Newport.

While the land is largely open fields and hedgerows, its important landscape and ecological features can be retained and enhanced in the development. Its allocation has the prospect of bringing forward early affordable housing provision and could accommodate local services and facilities as required.

National Government suggests a vigorous housebuilding industry is needed to kick-start a lethargic economy and initiatives have been commenced to encourage the planning Process to allow a faster lead-in time to development. The Revised Deposit Plan proposals do little to provide a range of housing sites offering choice, variety and quality in the short-term and flexibility to deal with changes in circumstances. This site in Langstone will enhance the housing allocations and the development opportunities in Newport during the Plan period.

Paragraph or section number(s) Section 5.
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Justification of Requirement

Following representations at the Deposit LDP stage the housing requirement figure has been justified and increased from the proposed Welsh Government Population projections. There is scope for an authority to deviate from the WG population projections but this deviation is required to be well evidenced. The NLP assessment sets out this evidence base and illustrates that Newport, as one of the few areas in Wales with an anticipated population increase noted in the Census, is set to grow and reflects the Council’s policy aspiration for growth. It should be recognised that the majority of the sites (46 of 55) have planning permission or permission subject to a Section 106 agreement. This established supply with clear market intent illustrates not only that a growth strategy is appropriate but achievable.

As noted above, the Plan identifies its housing requirement for the plan period based on an assessment of need and this is also true of its employment land requirements. The clear strategy for the Plan is for growth and it will be through the successful implementation of the policies of the Plan that this will be achieved. There is a clear link between housing supply and economic growth which is why the supply will be monitored annually.

Reliance on previous Development Plan sites

The Local Development Plan does have a number of housing sites which were identified within the Unitary Development Plan. In total there are 15 of the 55 housing sites which continue into the new plan. The majority of these sites have progressed significantly from the UDP, as noted below:

1. Land adj. McReadys. As of 1st April 2013 the developer is on site preparing the site for development.
2. Eastern Expansion Area. Planning permission has been granted with a signed Section 106 agreement. Gallagher Estates have confirmed through the JHLAS process that they will be delivering units on site in 2015.
3. Glebelands. This site has an extant planning permission associated with the school site adj to the residential area. The land has recently been sold to a developer.
4. Monmouthshire Bank Sidings. Redrow are on site and progressing.
5. Traston Lane. The site has planning permission and the agent has confirmed that they anticipate development on the site in 2015.
6. Pirelli. This site has been sold to the Seren Group (RSL) who launched the development in September 2013.
7. Ty Du Works. An application is being considered by the Council for a new scheme on the site.
8. Farmwood Close. This is an historic site with a LDC for the implementation of 10 units which have not been completed. The land is currently being marketed.
9. City Vision. The developer is on site and progressing.
10. Trinity View. The developer is on site and progressing.
11. Glan Llyn. The developer is on site and progressing. A third developer (St Modwen) are anticipating to begin work on Phase 2 in 2015.
12. Mill Street. The site is owned by NCC who will market the site.
13. Herbert Road. This site is adjacent to the Glebeland site noted above. The site is compliant with the overall strategy of the LDP being a brownfield urban site in need of regeneration. There is no application on the site but the area land owner notes their intention to sell the site for development. 14. Whitehead Works. This site is part of a Welsh Government regeneration scheme, which anticipates delivery to begin in 2016.
15. Bideford Road. This site is compliant with the overall strategy of the LDP being a brownfield urban site with potential for regeneration. There is no application on the site but the area is the remaining part of a housing estate development.

The information above clearly shows that although there are a number of sites which have continued from one development plan to the other they have in the main progressed significantly or that they will be delivered within the plan period. It is also important to note that it was made clear through the UDP process that the growth proposed in the east of the city (i.e. Glan Llyn and Llanwern Village) was not anticipated to be delivered wholly within the UDP plan period.

Affordable Housing

It is recognised that the required level of affordable housing for Newport cannot be met by the Plan alone. The level of supply which can be achieved through the implementation of the affordable housing policy in addition to those units already secured through the planning process has been clearly set out. It is not the sole responsibility of the planning system to meet the affordable housing requirement however the Plan does set a policy framework in order to achieve the highest level of affordable housing provision possible. Such provision has taken into account the viability of the policy threshold for affordable housing yet remains flexible to ensure that viability can be considered so that the housing market is not stifled by a non-negotiable approach to affordable housing provision.

Over reliance on previously developed sites
Planning Policy Wales sets out the overarching requirement for development to be placed on brownfield sites in preference to greenfield sites. The plan allocates 82% housing units on brownfield sites with the remaining 18% of units on greenfield sites (these calculations exclude the completions, windfall and small sites supply figures). The LDP is therefore compliant with Planning Policy Wales in terms that it has followed the search sequence criteria starting with the re-use of previously developed land and buildings within settlements which are located in areas accessible to jobs and services, where there is existing infrastructure and the scope to build sustainable communities.

Sites beyond the settlement boundary
As part of the development of the LDP sites were suggested for inclusion across Newport. Those applications have been assessed individually and the result of this assessment can be viewed in the Alternative Sites Assessment Report 2013. In addition to this work a review of boundaries, including Langstone, was undertaken the full details of which can be viewed in the Settlement boundary methodology background paper 2013.

Housing Land Supply
Based on a housing supply of 11,622 units over the LDP plan period the Council anticipate the following delivery rate:

- Completions to date (Oct 2012) = 5%
- Remaining completions between 2011-2015 = 25%
- Completions between 2016 – 2020 = 38%
- Completions between 2021 – 2026 = 19%
- Remaining 13% left to small site and windfall completions.

The plan sets out the anticipated rate of delivery in Chapter 13 which illustrates that the total number of units is set to be delivered across the plan period. This in turn is established yearly through the Joint Housing Land Availability Study and monitored annually within the AMR. The effects of the economic recessions are still being felt within the housing market so it is therefore of no surprise that the plan anticipates a lower growth in the first period of the plan compared to the final ten years.

It is considered by the Council that the Plan provides enough land that is both deliverable and viable which ensures a 5 year supply is met and, that although the annual build rate is higher than currently achieved, even when taking into account the residual method of calculation there is an adequate supply of land which has been agreed with the industry through the JHLAS process. Many of the sites have progressed since the Revised Deposit Plan was written and deliver rates will need to be taken from the most up to date JHLAS study process.

The annual monitoring process will consider the implementation of the policies within the Plan, including the delivery of housing allocations, including the overprovision of housing. The Plan sets out a supply based on a robust evidence base which reflects the key strategy for Newport of regeneration on brownfield sites. This prioritisation of the sustainable use of land will be undermined with the increased allocation of greenfield sites.

The site at Magor Road is located adjacent the urban boundary and partially within C2 Flood Zone. Residential development in such locations should be resisted in accordance with TAN 15.

The plan seeks to promote the reuse of Brownfield sites in preference to extensive use of Greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities.

The forecast housing need has been assessed in the context of population and employment projections and current market realities. The Plan allocates more than sufficient land to meet this requirement. Additional housing allocations in a rural location cannot therefore be justified. Furthermore, the release of the representation site for housing would be contrary to the Council’s strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

It is recommended that this site is not included in the Local Development Plan for development.
<table>
<thead>
<tr>
<th>Rep'n/Para/Policy</th>
<th>Representer</th>
<th>Agent</th>
<th>Accession No</th>
<th>Date Lodged</th>
<th>Late?</th>
<th>Source</th>
<th>Type</th>
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<tr>
<td>1401.L1/H01.47</td>
<td>Gallagher Estates</td>
<td>Turley Associates</td>
<td>26/07/2013</td>
<td>E</td>
<td>C</td>
<td>M</td>
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Document: Revised LDP, p.67
Policy: H01.47
Summary: Covering Letter

Additional material submitted - Please click here
Dear Sirs

REVISED DEPOSIT LOCAL DEVELOPMENT PLAN CONSULTATION
REPRESENTATIONS ON BEHALF OF GALLagher ESTATES LTD

I write with regard to the above document which has been published for consultation. The comments set out in the attached forms are made on behalf of our clients, Gallagher Estates Ltd.

The representations attached are made in the context of seeking to work with the Council to ensure an effective and deliverable plan for the area is adopted.

The main points of our representation which are set out in this letter are:

- We seek an increase in the number of homes to be provided in the plan period
- We support the continued inclusion of the Eastern Expansion Area and the Llanwern Village commitment
- We object to the north-south link in the Eastern Expansion area to be included as a Major Road scheme and consider it should be downgraded to a pedestrian/cycle link
- We object to the allocation of Ringland Allotments as a contingency site for transit or residential accommodation for Gypsy and Travellers

Gallagher Estates control land at Llanwern Village as shown on the attached plan. The site forms part of area to the east of Newport known as the Eastern Expansion Area. The whole site benefits from planning permission (LPA Ref: 06/0845) for:

“Residential development (up to 1,100 dwellings) and provision of a primary school, village centre (comprising small shops and workplaces, community meeting place and doctor’s surgery/health centre), public open space, landscaping and associated infrastructure works.”

Given the scale of the proposed development, the site has been subject to an Environmental Impact Assessment (EIA) and associated updates which demonstrate the appropriateness and acceptability of development in that location.

Continuous discussions and work with the Council is enabling the delivery of the above development through the preparation and submission of Reserved Matters and Discharge of Conditions. The first Reserved Matters application is currently being prepared and is due to be submitted in August 2013, along with discharge of a host conditions.

Development is due to commence on site as soon as the upcoming Reserved Matters and associated conditions have been discharged and delivered in line with the details set out in the Local Development Plan’s Delivery and Implementation Table (Chapter 13).

Soundness

For the reasons set out in our representations we do not believe the Revised Deposit LDP to be sound as the LDP fails to:

- C1: have regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.
- C2: have regard to National Policy
- CE1: set out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is compatible with the development plans prepared by neighbouring authorities
- CE2: the strategy, policies and allocations are realistic and appropriate having considered the relevant alternative and/or are founded on a robust and credible evidence base.
CE3- There are clear mechanisms for implementation and monitoring.

General Local Development Plan Comments.

It should be noted that not all of the footnotes contained within the LDP are provided for the references made in the text.

The Settlement Boundary Methodology Paper (June 2013) states at Page 36 that planning permission (06/0845) was granted in outline in 2008 but in fact planning permission was granted in 2009.

Attending the Hearing Sessions

As a major promoter of the Local Development Plan we wish to be in attendance at all of the hearing sessions which correspond with the Policies to which our representations relate. This will allow us to present Gallagher Estates case, elaborate further on the points made within our representations and to ensure the Inspector is fully informed.

<table>
<thead>
<tr>
<th>Item Question</th>
<th>Council Responses</th>
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</thead>
<tbody>
<tr>
<td>13</td>
<td>Gallagher Estates</td>
</tr>
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Issues raised are dealt with under each specific representation registered 1401. L2, L12, L7 and L10. The final version of the plan will have completed and full footnotes. The Settlement Boundary Background paper will be updated to reflect the correct approval date.

<table>
<thead>
<tr>
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<tbody>
<tr>
<td>11</td>
<td>Gallagher Estates</td>
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</table>

We support the inclusion of the development of the Eastern Expansion Area as a key element of the Plan’s Spatial Plan. Gallagher Estates are committed to delivering the Llanwern village element of the Eastern Expansion Area within the plan period in order to meet the Vision, Objectives and Spatial Strategy of LDP.

<table>
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<tr>
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<tbody>
<tr>
<td>12</td>
<td>Speaking at Public Examination</td>
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</table>

We consider our presence at the hearing session is necessary to allow us to present Gallagher Estates case, elaborate further on the points made within our representations and to ensure the Inspector is fully informed.

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<tr>
<th>Item Question</th>
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<tbody>
<tr>
<td>13</td>
<td>Support noted.</td>
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<td>Item</td>
<td>Question</td>
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<tr>
<td>11</td>
<td>Gallagher Estates support the principles of sustainable design and recognise the overall requirement by the Welsh Government for the development of more sustainable housing in Wales. Policy H2 is requiring new development to be built to the Code for Sustainable Homes Level 3 with 1 credit under ENE01 as outlined in Planning Policy Wales, Paragraph 9.1.1. Gallagher estates are pleased that Newport Council are not seeking to introduce higher standards than currently proposed by the Welsh Government, particularly given that these standards are significantly higher than those being applied in England. Newport Council and the Welsh Government must recognise therefore that requesting standards above Building Regulations places additional burden onto development which may jeopardise viability and therefore new housing development. Gallagher Estates would also like to remind the Council that the Code for Sustainable Homes is currently under review by the Government with the potential that the standard could be abolished this year. In this event Gallagher Estates request that the Building Regulations are used as the local standard for sustainable housing.</td>
</tr>
</tbody>
</table>
| 12   | Speaking at Public Examination

We consider our presence at the hearing session is necessary to allow us to present Gallagher Estates case, elaborate further on the points made within our representations and to ensure the Inspector is fully informed. |

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**Council Responses**

The plan policies note the current mandatory minimum standards but are flexible so that the developer would need to comply with the most up to date standards. Welsh Government have investigated the impact such new regulations have on the development industry and would seek so not to affect viability through the introduction of such regulations.
Gallagher Estates

We welcome the inclusion of land controlled by Gallagher Estates at Llanwern Village as a previous commitment, to be carried forward into the LDP. The site is referenced in the table at page 65 as H3 and named Eastern Expansion Area. It is suggested the name of the site should be amended to avoid confusion. The Eastern Expansion Area at Policy SP11 and traditionally through adopted policy and guidance includes both the redundant part of the Llanwern Steelworks, and the greenfield commitment immediately adjacent to Llanwern Village, north of the railway line. It is therefore suggested the site to be known as Llanwern Village for clarity and distinction.

The site area noted in Policy H1 table details the site area to be 44 hectares. The submitted and approved proposal at Llanwern Village for 1,100 units covers an area of 55.81 hectares (as detailed on the planning application forms).

We welcome the inclusion of site H55 Woodland Site, Ringland as a new allocation in the LDP. The proposed primary pedestrian link through the Llanwern Village approved development would link straight in to the newly proposed Woodland allocation site, providing a sustainable link for children to access the proposed primary school and resident to access the proposed community facilities within the Llanwern Village site.

Speaking at Public Examination

We consider our presence at the hearing session is necessary to allow us to present Gallagher Estates case, elaborate further on the points made within our representations and to ensure the Inspector is fully informed.

Noted. Agree to amend the site name to Llanwern Village to avoid confusion. The site area noted in table H1 reflects the extent of the developed site, as denoted on the Proposals Plan.
<table>
<thead>
<tr>
<th>Item Question</th>
<th>Council Responses</th>
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<tbody>
<tr>
<td>11 Representing Gallagher Estates support the principles of Policy GP1 in that new development should be designed to mitigate and adapt to climate change. It is important however that the Council applies this policy with due recognition to the commercial viability of development and the additional costs that can arise through design measures above Building Regulations. The Building Regulations are delivering significant reductions in carbon emissions for new housing and The Flood and Water Management Act (2010) requiring new development to manage and attenuate the predicted increase in rainfall as a result of climate change. Policy GP1 requires new development to 'minimise energy requirements and incorporate appropriate renewable, low or zero carbon energy sources, including on site energy provision where possible'. The Welsh Government recently announced that they would be abandoning their attempts to set higher requirements for Part L of the Building Regulations than currently being required in England. With this recent announcement, it is entirely possible that the current and future iterations of the Building Regulations could be met through a 'Fabric First' solution which would negate the need for on-site energy generation. This approach is the most sustainable because it reduces carbon emissions for the life of the dwelling. It is important that Newport Council recognise this and in applying this part of the policy, recognise that there could be alternative solutions to these technologies to achieve the desired energy performance. Policy GP1 also states that development proposals should 'meet the relevant BREEAM or Code for Sustainable Homes level' which is currently set out in Planning Policy Wales, Paragraph 9.1.1. Again, Gallagher Estates request that Newport Council apply this policy with due consideration to the ongoing review of the Code for Sustainable Homes and recognise the possibility that the Code may be abolished in the very near future. In this event we request that the Council utilise the Building Regulations as the mechanism to demonstrate energy efficient and sustainable housing. In summary, Newport Council should recognise that the principal objectives of policy GP1 are being delivered simply by meeting the regulations and therefore there should be no expectation that new development go beyond these mandatory standards.</td>
<td></td>
</tr>
<tr>
<td>12 Speaking at Public Examination</td>
<td>Yes</td>
</tr>
<tr>
<td>We consider our presence at the hearing session is necessary to allow us to present Gallagher Estates case, elaborate further on the points made within our representations and to ensure the Inspector is fully informed.</td>
<td></td>
</tr>
<tr>
<td>13 Council Response</td>
<td></td>
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<tr>
<td>The proposed amendments are considered unnecessary. Policy GP1 does not require developers to exceed the standards set by Building Regulations, and the reference to BREEAM and CSH would cease to be relevant to applications if these regulations were rescinded. In addition, GP1 ii) includes the phrase 'where practicable' and therefore provides a degree of flexibility in the determination of planning applications</td>
<td></td>
</tr>
</tbody>
</table>
**Representation Details**

**Representor:** Gallagher Estates

**Agent:** Turley Associates

**Accession No:** 1401.L6//CF13

**Date Lodged:** 26/07/2013

**Source:** P

**Type:** C

**Mode:** I

**Status:** M

**Status Modified:**

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**Document:** Revised LDP, p.113

**Policy:** CF13

**Summary:** Gallaghers confirm that a new school will be delivered at the Llanwern Village development.

---

**Item Question** | **Representation Text**
--- | ---
11 | We can confirm that a new school will be delivered at the Llanwern Village element of the Eastern Expansion Area. The Llanwern Village approved development provides a site large enough to accommodate a two form entry school if required.

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**Council Response**

**Comments noted.**

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12 | Speaking at Public Examination

We consider our presence at the hearing session is necessary to allow us to present Gallagher Estates case, elaborate further on the points made within our representations and to ensure the Inspector is fully informed.

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<tbody>
<tr>
<td>7</td>
<td>7</td>
<td>Delete an existing site</td>
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<tr>
<td>11</td>
<td>Representation</td>
<td>It is considered that the Llanwern north-south link is not required to be a full vehicular/pedestrian/cycle link given the proposed Llanwern station located to the south of the railway with a park and ride facility, which will be appropriately linked into the existing highway network of Newport. Connectivity via a pedestrian and cycle link is all that is necessary and will avoid a potential vehicular rat running situation. The cost of an all vehicular crossing is likely to lead to the need for public subsidy given increasing costs where such monies could be spent on more necessary projects elsewhere. In summary, the Llanwern north-south link should be removed from SP16 as a Major Road Scheme and downgraded to a pedestrian/cycle bridge which will make a positive and appropriate contribution towards change to travel behaviour in the authority, in line with Objective 4 of the LDP, encouraging sustainable travel and reduction of use of the private motor car.</td>
</tr>
<tr>
<td>12</td>
<td>Speaking at Public Examination</td>
<td>We consider our presence at the hearing session is necessary to allow us to present Gallagher Estates case, elaborate further on the points made within our representations and to ensure the Inspector is fully informed.</td>
</tr>
<tr>
<td>13</td>
<td>Council Response</td>
<td>Llanwern north-south link is considered essential to enhance public transport provision, contributing to the sustainability of the steel works regeneration site and the Llanwern Village redevelopment scheme as a well as providing access to the proposed park and ride facility at Llanwern.</td>
</tr>
</tbody>
</table>
**Representation Details**

<table>
<thead>
<tr>
<th>Accession No</th>
<th>Date Lodged</th>
<th>Late?</th>
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<td>1401.L8/H01.03</td>
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Additional material submitted

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**Document:** Revised LDP, p.65

**Policy:** H01.03

**Map:** Inset 9: Llanwern Village Area

**Summary:** Boundary of the EEA shown on Inset 9 should be extended to correspond with the planning application site area.

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**Item Question**

<table>
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<th>Item</th>
<th>Question</th>
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<tbody>
<tr>
<td>4</td>
<td>A new paragraph or new text</td>
<td>Yes</td>
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<tr>
<td>6</td>
<td>Amend the boundaries of an existing site</td>
<td>Yes</td>
</tr>
<tr>
<td>11</td>
<td></td>
<td>Gallagher Estates supports the identification of the Llanwern Village commitment in Proposal Map Inset 9. However, the extent of the commitment area should be modified to reflect the red line area of Planning Permission 06/0845. Currently the boundary of the commitment site includes just the indicative built form and excludes areas of open space to the north and south, along with the access to the site. The proposed indicative open space to the north and south is an integral part for the approved development and will play an important role in the settlement of Llanwern. In light of the above, the orange hatched area representing the extent of the Llanwern commitment should be amended to reflect the full extent of approved development (LPA Ref: 06/0845) i.e. the red line boundary (see attached plan). Accordingly the Llanwern Village Boundary should also be extended to follow the extent of the Llanwern commitment as amended. It is also recommended the Housing Policy reference, H1 (3) is included on the Map to aid identification and cross referencing throughout the plan.</td>
</tr>
<tr>
<td>12</td>
<td>Speaking at Public Examination</td>
<td>Yes</td>
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</table>

**Council Response**

We consider our presence at the hearing session is necessary to allow us to present Gallagher Estates case, elaborate further on the points made within our representations and to ensure the Inspector is fully informed.

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**Item Question**

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<td>13</td>
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<td>It is acknowledged that land beyond the settlement boundary as shown on Inset Plan 9 forms part of the Llanwern Village planning permission. However, the settlement boundary has deliberately been drawn tightly around the areas of built development, with open spaces falling outside of the settlement boundary. This is to provide stronger control over future pressure for additional greenfield development whereby developers will seek to build houses on the open space and provide replacement open spaces within the countryside, resulting in expansion of the urban area by stealth.</td>
</tr>
</tbody>
</table>
Policy SP11 brings forward the current Eastern Expansion Area allocation and commitment through into the LDP. It is considered the Policy should be more precise and descriptive about the area included in the allocation to reflect the East Newport Development Framework Plan Supplementary Planning Guidance (SPG). Currently Policy SP11 makes reference to the land centred around the redundant part of the steelworks. It does not make reference to the fact the area is in part brownfield and in part greenfield. The site is effectively split into two sections via the railway, with the brownfield area to the south of the railway (including the redundant steelwork site), known as Glan Llyn and the green site to the north of the railway known as Llanwern Village. It is suggested that SP11 should be re-worded as follows:

"Land to the east of the city, including the redundant part of the Llanwern Steelworks (known as Glan Llyn) and greenfield land to the north (known as Llanwern Village), is identified as a mixed use, sustainable urban expansion area and will be required to provide a range and choice of housing, employment land and community uses."

In summary, it is considered the SP11 should be more prescriptive in its description, highlighting the Eastern Expansion Area also includes the greenfield site to the north of the railway, reflecting the supporting text and the East Newport Development Framework SPG. Setting out the full extent of the Eastern Expansion Area on the Proposals Map correctly would more accurately demonstrate the area to which Policy SP11 relates as currently the Proposals Map only indicates the greenfield site falls under SP11.

We consider our presence at the hearing session is necessary to allow us to present Gallagher Estates case, elaborate further on the points made within our representations and to ensure the Inspector is fully informed.

Agree to amend the wording of the policy to clarify that the Eastern Expansion Area includes the development at Llanwern Village.
### Representation Details

**Document:** Revised LDP, p.75  
**Policy:** H15.02  
**Summary:** G&T site should be deleted from the Plan (H15(ii) & H16(ii)).

<table>
<thead>
<tr>
<th>Item</th>
<th>Question</th>
<th>Representation Text</th>
<th>Soundness Test</th>
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<tbody>
<tr>
<td>7</td>
<td>Delete an existing site</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>Soundness Test</td>
<td>CE1, CE2 and CE3</td>
<td></td>
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</tbody>
</table>
Tests of Soundness Policy H15 (ii) and H16 (ii) of the Revised Deposit Draft are not sound on the basis of failing to meet the following tests relating to coherence and effectiveness.

Coherence and Effectiveness Tests

Test CE1

Policies H15 and H16 fail to meet the tests set out in CE1, in so far as they do not form a coherent strategy that logically flows from the aims and objectives set out elsewhere in the Revised Deposit Plan. In doing so the policies within the LDP itself are not consistent.

Paragraph 2.31 of the Revised Deposit Plan states that a key task of the plan is “to ensure an adequate and continuing supply of land to meet likely future housing needs.” Policy SP10 identifies a requirement to provide 11,622 homes over the plan period, which will be met largely through the allocations set out in Policy H1. This includes land at Llanwern Village, which forms part of the Eastern Expansion Area. Policy H1 makes it clear that 1,100 new homes are expected to be delivered as part of this development over the plan period. Policy SP11 deals specifically with the Eastern Expansion Area, which also includes land at Glan Llyn. Together those two sites alone are expected to deliver over 5,000 units and therefore form a key part of the overall housing strategy set out in the plan.

Given its location, the allocation of Ringland Allotments as a contingency residential or transit site would have a detrimental impact on the delivery of new homes (and associated community facilities) at Llanwern over the plan period. The allotments are subject to the planning obligations set out in the s.106 Agreement relating to the extant planning permission relating to Llanwern (ref: 06/0845). Paragraph 9 of Schedule 1 and Paragraph 7.2 of Schedule 3 of the s.106 Agreement contain obligations on the Council to transfer Ringland Allotments to our clients when they provide a new allotment site within the Eastern Expansion Area. Under the terms of the s.106 Agreement the land identified under Policy H15 and H16 at Ringland Allotments will be transferred to our clients and will not be in the Council’s control. The land would therefore not be available for use as a gypsy and traveller site (either permanent or transit) over the plan period. Once our clients have acquired the allotments through the s.106 Agreement it will be landscaped in order to create a key strategic gateway to the development site. This is considered to be an important part of the overall marketability of the development and will also be of wider benefit to the amenity of the local area.

The allocation of Ringland Allotments as a transit or permanent gypsy and traveller site would clearly undermine the objective of creating a key gateway to the site and the deliverability of the development. The allocation of this land as a contingency site will at best sterilise it over the course of the plan period if it is not actually called upon. If either a transit or residential site is actually brought forward it will create an inappropriate gateway to what is a key strategic housing allocation. Rather than a landscaped gateway to the development, any transit or residential site is likely to be bounded by significant noise attenuation barriers in order to achieve necessary sound proofing from the Southern Distributor Road. A report to the Scrutiny Committee for Community Planning and Development on 24 April 2013 indicates that 2.5m high noise attenuation barriers are likely to be required (para. 2.10.2). This will provide an unsightly and inappropriate gateway to the Llanwern development.

It should also be noted that part of the northern most section of Ringland Allotments is subject to a s.278 Agreement, which will see the widening of Cot Hill in order to provide suitable access to the Llanwern development. This would see the developable area of the proposed allocation in Policy H15/16 reduced further. The added traffic associated with the development at Llanwern (accessing the site via Cot Hill) would also mean that the amenity of the site for residential or transit use would be further undermined by the new/improved access to the north. This would be in addition to the impact of the Southern Distributor Road to the west.

Overall, the allocation of Ringland Allotments for a contingency site, whether or not it is actually called upon, will undermine the delivery of what will be a key gateway entrance to the proposed Llanwern development. This will in turn undermine the aims and objectives of other policies in the LDP, including SP10, SP11 and H1.

Test CE2

Policy H15 and H16 both fail to meet the requirements of test CE2, which requires policies and allocations to be realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base. As stated above, there are a number of reasons why the site is not suitable for a transit or residential site relating to delivery of the Eastern Expansion Area development at Llanwern. There are also a number of other site specific constraints which mean that the site should not be allocated for such uses.

The topography of the site is not suited for the proposed use given that it slopes from the east to the west. The flattest part of the land fronts the A48 (Southern Distributor Road), which again in itself...
presents a constraint due to noise. The Welsh Government Good Practice Guide in Designing Gypsy and Traveller Sites in Wales (2009) states that land should be flat and suitable for the development planned (Para. 3.2.5). The topography of the site is clearly not suitable for accommodating the pitches as required. At best, should ground re-profiling be possible, the developable area would be further reduced.

The developable area is also further reduced by the presence of electricity pylons crossing the site in two different directions. Again this is likely to sterilise part of the site once the requisite buffer zones and maintenance access is provided for. The presence of pylons traversing the site also raises concerns relating to amenity. This is not referred to in a report to the Scrutiny Committee for Community Planning and Development on 24 April 2013, which considered the individual site appraisals. The report does, however, recognise that a medium pressure gas main crosses the north eastern corner of the site, which will further reduce the developable area.

As stated above, the site also fronts the A48 Southern Distributor Road, which is a dual carriageway forming a main arterial route serving the City. The location of the site in close proximity to a dual carriageway makes the site unsuitable for use as a transit or residential site due to health and safety and amenity concerns. The Welsh Government Good Practice Guide (2009) states that "local authorities should avoid locating sites next to or near hazards which present specific risks to children and adults such as dual carriageways". Due to limited indoor space it is recognised that the outdoor environment is particularly important to gypsy and traveller children. As such, it is inappropriate to locate a transit or residential site adjoining this key arterial route. This position is made worse by its proximity to Cot Hill, which will be the main access point to the 1,100 dwelling development at Llanwern.

The proximity of the dual carriageway would also have a serious impact on the amenity of future residents due to noise. The nature and type of accommodation forming part of a gypsy and traveller site is clearly more susceptible to noise pollution than homes in the settled community. Whilst the Council has indicated that noise attenuation barriers could be utilised we would question whether this would create a suitable environment for future residents and would also further reduce the developable area. This problem is likely to be exacerbated by the flattest part of the site, and therefore the most likely to be used to accommodate pitches, being located in closest proximity to the dual carriageway.

The proposed access to the transit or residential site is also considered to be unsuitable for use as a gypsy and traveller site. The distance between the existing access and the dual carriageway, and the arrangement of the existing road, is not considered suitable to safely accommodate the type of vehicles that will need to access the site. The Welsh Government Good Practice Guide (2009) states that roads should be wide enough to allow chalee/mobile homes access on low loader vehicles and should be wide enough to allow two lorries to pass each other. We do not believe that this arrangement could currently be safely accommodated. Our concerns are exacerbated by Cot Hill providing the main point of access to the Llanwern development. As a result, the nature of the highway network, and the access to the Ringland Allotments site, will change significantly over the plan period. This will involve increased vehicle movements associated with the 1,100 new dwellings and associated community facilities.

We are also concerned that the proposed allocation has not been prepared in accordance with national policy or good practice guidance. In particular, the allocation of the site for a transit or residential site clearly contradicts advice given in the Welsh Government Good Practice Guide (2009). We also have concerns relating to the process followed by the Council in identifying the sites in Policy H15 and 16. The assessment process appears to have been inconsistent and subjective and the reasoning for some sites to be discounted and others to remain in the process are often unclear. Taking the Ringland Allotments site, the Council identified it as being unsuitable in the initial 'Long List', on the basis of unsuitable access. A report to the Scrutiny Committee for Community Planning and Development on 24 April sets out conclusions drawn from the "site appraisal results and information gathered throughout the Scrutiny Committee review". Reviewing the conclusions drawn on a number of the sites listed, it is unclear why some where discounted from the process. For example, the report concludes that site constraints at the Former Langstone Nursery Site and the former Chicken Processing Plant at Marshfield are not insurmountable.

The methodology used during the site assessment process is also questionable. Despite the appraisal process of the 11 shortlisted sites beginning in November 2012, it was only at the Scrutiny Committee meeting of the 13 March 2013 that the site appraisal topics "against which the potential Gypsy and Traveller sites were being appraised" were endorsed. The agreement of these criteria should have been established at the outset, and before certain sites were removed from the process.

Overall, given that the site is not readily available for development as a transit or residential site, forms a key part of providing a gateway to the wider Llanwern strategic development and is subject to a number of site specific constraints, it fails the tests set out in CE2. We are also concerned as to the Council’s failure to adhere to good practice guidance and the inconsistency and objectivity of the assessment process undertaken. The allocation is not realistic or appropriate and cannot therefore be considered to be sound.

Test CE3

The policies fail to meet the test set out in CE3, which requires there to be a clear mechanism in place for implementation. The identification of Ringland Allotments as a 'contingency' residential or transit site fails to take account of the practicalities of actually delivering such a use. As set out above, there are a number of site specific constraints that make the principle of a transit or residential use on the site unsuitable. There are also a number of other issues relating to the delivery of such uses, which mean that such an allocation would be difficult to implement. These include the fact that
part of the site is required for highway works relating to the Llanwern development and that the site as a whole will pass to our clients as part of the s.106 Agreement relating to the extant Llanwern outline planning permission. The mechanisms for delivering the site are therefore questionable. A report to the Scrutiny Committee for Community Planning and Development on 24 April 2013 noted that the site will pass to our clients as part of the s.106 Agreement. The report also notes that the option "remains open to the Council to seek to vary the terms of the legal agreement, or to buy or compulsory purchase the site" (Para. 2.2.1). Selling the land or vary the terms of the s.106 Agreement in relation to this matter would not be supported by our client. Following the CPO route would also not be welcomed by our client and is likely to be a time consuming and costly process. The supporting text following Policy H16 makes no reference to difficulties involving the landownership of the site and the potential need to compulsory purchase the land in order to deliver such a use.

By identifying the site as a contingency it is also ambiguous in terms of targets or milestones for delivery. As stated above, the land is intended to form a gateway marking the entrance to the Llanwern development, which is a major urban extension and an important part of delivering the housing requirement over the plan period. Aside from the fact that the site itself is not considered suitable for the proposed use, identifying it as a contingency will effectively sterilise it for the course of the plan period. This will have a negative impact on the delivery of the 1,100 homes forming part of the Llanwern development.

Conclusion
In light of the above Ringland Allotments should be deleted from Policy H15 and H16 of the Revised Deposit Plan. The site is entirely unsuitable for the proposed use as a transit or residential site and is contrary to national good practice guidance. The allocation of the site would also have a detrimental impact on the delivery of the Eastern Expansion Area, which forms a key part of the delivery of the housing requirement over the plan period. Even if the allocation was not brought forward the land would effectively be sterilised over the course of the plan period and the proposed landscaping works could not be provided. This would seriously undermine the requirement to create a gateway entrance to the Llanwern development. The allocation also fails to take account of the availability of the site, given that it will pass to our clients as part of the s.106 Agreement associated with the Llanwern development. The policies are therefore considered to be unsound and should be deleted with alternatives sites identified in its place if a contingency site is deemed necessary by the Council.

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**Speaking at Public Examination**

We consider our presence at the hearing session is necessary to allow us to present Gallagher Estates case, elaborate further on the points made within our representations and to ensure the Inspector is fully informed.
The provision of Gypsy and Traveller accommodation, as outlined in Policies H15 and H16, is a requirement of National Planning Policy which requires Newport City Council to identify these sites to meet an identified need. The design and visual impact of the site will be mitigated by a 2.5m high noise attenuation barrier which is required alongside the SDR. This will help to create privacy and screen the development from the road. The appearance of this fence can be softened by the use of appropriate landscaping.

There is a current planning permission which has a signed section 106 agreement that transfers the land at the Former Ringland Allotments to Gallagher Estates. We are aware there are high level discussions on-going with regard to the current Llanwern Village application, its delivery and the S106 obligations. However, the Council has a desire to keep the site allocated for contingency purposes. It is understood that although some of the land is required to improve access to Cot Hill for the Llanwern Village development, the whole site is not required. The remaining area is of an adequate size to accommodate the proposed use, while allowing for the approved access road improvements.

Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable. No concerns with regard to health implications have been raised by Environmental Health or the Utility Providers. The indicative site layout takes into account the overhead pylons and the topography of the site, and this work confirms that the site is large enough to provide 7 pitches.

Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development. The results of these surveys have confirmed that some ground re-profiling works will be required at the Former Ringland Allotments. This work will add to the development costs but is not considered to be insurmountable. The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than statutory guidelines state. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process. The agreement of the appraisal topics on 13 March 2013 was to formalise previous discussions regarding the extent of the appraisal work, and to allow time to address any additional issues that the Scrutiny Committee considered needed to be investigated. No additional issues were raised, allowing the appraisal results to be presented to the following meeting.

The provision of Gypsy and Traveller accommodation will be monitored over the plan period. The relevant course of action (e.g. Policy review) will be undertaken dependent on the outcome of the review. In conclusion, the Former Ringland Allotments site has been allocated as a contingency site for Gypsy and Traveller transit or residential accommodation following a detailed scrutiny review exercise. Further information on the Scrutiny Review Exercise can be viewed in the Consultation Report. The Council is required by National Planning Policy to set out the need for and to make appropriate provision for Gypsy and Traveller accommodation in Local Development Plans. Newport has identified a need and this site is one of three proposed Gypsy and Traveller sites which is required to meet the identified need. The site will therefore remain within the Plan in order to satisfy the requirement set out in National Planning Policy. The preferred sites are identified as the Hartridge farm Road site for residential use and the Celtic Way site as a transit use. However, this site is considered to be suitable for the proposed use and deliverable, albeit that, should this contingency site be required, the Council may have to use its CPO powers.
4 4 A new paragraph or new text

6 6 Amend the boundaries of an existing site

11 11 Representation
As with Proposal Map Inset 9 the overall Proposal Map should also identify SP11/H1 (3)/Inset 9 fully to reflect the whole extent of the Llanwern Village commitment as set out in Planning Permission 06/0845. The H1(3)/Inset 9 boundary line should be amended to follow the red line boundary of Planning Permission 06/0845 (see attached plan).

It also appears to highlight that SP11 Eastern Expansion Area relates only to the Llanwern, greenfield part of the allocation and does not include the wider area (i.e. the redundant Steelworks) which is set out in the East Newport Development Framework Plan SPG. It is therefore recommended the proposals plan is amended to clearly show the extent of the SP11 Eastern Expansion Area.

12 12 Speaking at Public Examination
We consider our presence at the hearing session is necessary to allow us to present Gallagher Estates case, elaborate further on the points made within our representations and to ensure the Inspector is fully informed.

13 13 Council Response
Agree to amend the wording of the policy to clarify that the Eastern Expansion Area includes the development at Llanwern Village.

Amend paragraph 2.37 to read:

In addition to the former steelworks site there is also the area to the West of Llanwern Village which has planning permission for 1100 units. This greenfield development proposes a residential development with associated community facilities such as a school forming part of the overall Eastern Expansion Area. Further detail of the overall area can be found in Supplementary Planning Guidance.

The proposed new site at Llanwern Village each parcel of land highlighted is either an area of countryside or an environmental space, locations at which development is resisted under all but exceptional circumstances. Moreover, there is no demonstrable need to increase the Eastern Expansion Area, since sufficient housing land has been allocated for the plan period. In view of this, the housing commitment shall not be increased.
### Representation Details

**Rep'n/Para/Policy**: 1401.L12//SP10  
**Representor**: Gallagher Estates  
**Agent**: Turley Associates  
**Accession No**: 26/07/2013  
**Date Lodged**: 26/07/2013  
**Late?**: No  
**Source**: P  
**Type**: O  
**Mode**: I  
**Status**: M  
**Status Modified**: Yes

Additional material submitted

**Document**: Revised LDP, p.24  
**Policy**: SP10  
**Summary**: Housing requirement should be increased.

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The Plan fails the Tests of Soundness C1 and CE1.
We note the Council’s decision to increase the housing requirement from the Deposit Local Development Plan (April 2012). However, it is considered the level of provision could be increased further to meet the shortfall set against the previous Unitary Development Plan (UDP) requirement to fully meet the Plan’s Vision and Objectives, and the objectively assessed housing needs of the District. The proposed housing requirement of 10,350 is informed by the Assessment of Housing Requirement Paper and follows the Paper’s recommendations to choose the suggested housing requirement which takes into account demographics data but also an understanding of the future employment changes (Scenario E) to accord with the objectives of the LDP and the Welsh Government. This proposed requirement is higher than the projected housing requirement based on Welsh Government 2008 based projections and it is considered appropriate to deviate from the Government’s projections meet the aspirations of the Authority and the Welsh Government in relation to economic growth.

Eastern Expansion Area
We welcome the inclusion of the Eastern Expansion Area within Policy SP10 as a commitment to help meet the housing requirement over the plan period. Gallagher Estates are committed to delivering the approved development at Llanwern Village and as detailed above are currently working with the Council to submit Reserved Matters and Discharge of Condition applications.

Cross-boundary Issues
The Assessment of Housing Requirement Paper highlights the importance of needing to consider cross-boundary issues at Paragraph 2.41, 2.46 and 3.30, and the requirement to meet the LDP soundness tests C1 and CE1. Newport sits amongst Caerphilly, Cardiff, Torfaen and Monmouthshire Local Authorities, which Newport City Council should take regard to the matters arising in each authority. Scenario D of the Assessment of Housing Requirement Paper considers the potential impact of Cardiff upon the required housing requirement of Newport and draws upon revised population data set out in a report by Edge Analytics (June 2011), which was prepared to inform the Cardiff LDP. Paragraph 3.30 of the Assessment of Housing Requirements notes that the LDP proposed housing requirement does not take account of potential cross-boundary issues that were highlighted by Edge Analytics. Newport City Council does not consider or discuss the matters arising in neighbouring Local Authorities other than Cardiff in the housing requirement evidence base to demonstrate it meets C1 and CE2 sufficiently. Although Cardiff as the Capital and largest City of Wales is likely to have the biggest impact on Newport the other neighbouring authorities should not be disregarded.

In summary, the LDP and its supporting evidence does not currently demonstrate that sufficient work or consideration has been given to satisfy cross boundary matters and therefore fails to satisfy C1 and CE2 tests of soundness. It is important that this is addressed and documented appropriately in order for the plan to be deemed sound.

Flexibility
Currently the Revised Deposit Plan states at Paragraph 1.30 of the LDP that “Newport has a target to deliver approximately 10,350 new homes” and at SP10 states “a housing requirement of 10,350 dwellings” is required. It is considered that the wording set out in the LDP should be consistent throughout and the requirement figure should be expressed as a minimum figure. Therefore the wording in Policy SP10 should read as follows:

“Provision is made for XXXX units to deliver a housing requirement of at least XXXXX dwellings”.

This will ensure the requirement figure is not seen as a maximum and aims to boost housing land supply to allow for a deliverable supply of housing to meet the housing needs of the authority. This will ensure that growth is planned for positively over the plan period. This is essential given the lack of affordable housing in the Authority area (Paragraph 1.9 of LDP).

We support the approach that the Council has taken to identify sufficient land for housing provision above the proposed housing requirement (12% above the proposed requirement figure) to provide flexibility to the plan.

Addressing The Lack of Affordable Housing
The Revised Deposit LDP notes the lack of affordable housing as one of the key issues facing Newport which need to be addressed if the Plan is to achieve its Vision (Paragraph 1.9 of LDP). The Local housing Market Assessment 2013-2018 states there is a net annual need for 593 affordable housing units which equates to 8,895 over a 15 year plan period. Policy H4 of the LDP proposes a 30% target of all new residential developments on sites of 0.33 ha or 10 or more dwellings in the settlement boundary or 0.2 ha or 3 or more dwellings within defined village boundaries to be affordable. If the current proposed LDP requirement of 30% affordable contribution is taken, in order to address the affordable issue and the need set out in the Local Housing Market Assessment a higher level of housing will be required of at least 29,650 dwellings. The Policy SP10 acknowledges the overall need of affordable housing in the order 8,900 units but only sets an affordable housing target of 2,541 units. It is considered that the overall quantum of development should be increased which will result in the provision of additional affordable homes through the requirements of H4 to meet the objectively assessed need of the authority area.

Conclusion of the District Housing Requirement Comments
It is suggested that overall quantum of housing should be increased to at least 10,896 dwelling to include the undersupply of housing set against the previous UDP requirement. An increase in the housing requirement would provide additional affordable homes to help address the assessed affordable housing need. SP10, and therefore the Plan fails the Tests of Soundness C1 and CE1 due to the absence of sufficient cross boundary working in the LDP and evidence base.

Speaking at Public Examination

We consider our presence at the hearing session is necessary to allow us to present Gallagher Estates case, elaborate further on the points made within our representations and to ensure the Inspector is fully informed.

Council Response

Noted and we welcome the clarification as to the committed development rate for the Llanwern Village site. The work undertaken by NLP did consider cross boundary issues such as the influence from Cardiff but the final recommended scenario did not take into account the potential cross-boundary issues with Cardiff that were highlighted by Edge Analytics as that work does not take account of the recalibration that resulted in a substantial adjustment to the population projections for Newport. The reason for this is that it has not been possible to verify the analysis that informed the figures presented by Edge Analytics. This again points towards an upward pressure in the local housing requirements for Newport compared to the 2008 Welsh Government projections.

The housing requirement figure is set at 10,350 as such it will be used to assess the success of the Plan. The addition of the phrase ‘of at least 10,350 units’ would create ambiguity and lack certainty as to what figure the Plan was required to meet. The figure should not be seen as a maximum figure and the overarching strategy for growth in Newport would defend this approach.

It is recognised that the required level of affordable housing for Newport cannot be met by the Plan alone. The level of supply which can be achieved through the implementation of the affordable housing policy in addition to those units already secured through the planning process has been clearly set out. It is not the sole responsibility of the planning system to meet the affordable housing requirement however the Plan does set a policy framework in order to achieve the highest level of affordable housing provision possible. However, Gallagher's recognition of the affordable housing need and its commitment to contribute towards meeting that need is welcomed.

It is not considered necessary to include the noted undersupply of 546 from the Unitary Development Plan within the housing requirement figure in Policy SP10. This is because the Revised LDP has identified its requirement figure on the basis of need from 2011 onwards, which in effect would take into account that need not met pre 2011.
### Representation Details

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**Document:** Revised LDP, p.70

**Policy:** H04

**Summary:** Affordable housing target should be expressed as a target.

**Item Question**

| 4 4 | A new paragraph or new text | Yes |

**Representation Text**

We support the recognition that the viability of a development will be a consideration in assessing the level of affordable housing provided on individual sites. However, it is regarded the requested percentage should be expressed as a target and the wording of the policy re-phrased to be clearer in relation to viability.

It is therefore suggested Policy H4 should read as follows:

"Residential developments of 0.33 hectares or 10 or more dwellings, whatever the size of the site, within the settlement boundary, or 0.2 hectares or 3 or more dwellings, whatever the size of the site, within the defined village boundaries will be required to aim to include 30% affordable dwellings. In exceptional circumstances, where a scheme’s viability may be affected the level, size and type of provision may be determined through negotiation guided by details set out in the associated Supplementary Planning Guidance."

**Item Question**

| 11 11 | Representation |

Speaking at Public Examination Yes

We consider our presence at the hearing session is necessary to allow us to present Gallagher Estates case, elaborate further on the points made within our representations and to ensure the Inspector is fully informed.

**Item Question**

| 13 13 | Council Response |

Support noted. There is a clearly evidenced percentage of need within Newport, which stands at 86%. The policy therefore requires 30% but allows for flexibility where viability can be taken into account. It is therefore not considered necessary to set out the required percentage as a target as the policy is inherently flexible. The affordable housing supplementary planning guidance will set out in detail the application of the policy.
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Policy: H01

Summary: Allocate land at Risca Road, Rogerstone.

Document: Revised LDP, p.65

Additional material submitted - Please click here
### Representation Details

**by:** (No grouping)  
**Filtered to show:** (all of) Stage=L; Status=M  
**Rep’n/Para/Policy** | **Representor** | **Agent** | **Accession No** | **Date Lodged** | **Late?** | **Source** | **Type** | **Mode** | **Status** | **Status Modified**
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11 | 11 | Representation |  |  |  |  |  |  |  |  

#### 1.0 Introduction

1.1 Pontymister Developments Ltd objects to the omission of the land at Risca Road, Rogerstone as a residential allocation from within Policy H1. The land concerned is shown on the attached plan.

1.2 Omission of this land from the housing allocations results in the Deposit Local Development Plan being unsound in terms of the following tests:
- C2 in that the housing allocations are not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales;
- CE2 in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base in terms of future housing needs; and
- CE4 in that omitting the site from the housing allocations does not provide a reasonable level of flexibility to allow the Deposit Plan to deal with a higher housing requirement to meet local needs.

#### 2.0 Site Description

2.1 The broadly rectangular shaped 2.72ha site is situated immediately adjoining the settlement boundary for Rogerstone. The site comprises of a number of fields which are currently laid for grazing and pasture and rise in levels from south to north. To the south the site adjoins the existing residential development at Risca Road, comprising a combination of bungalows and two storey housing. To the east is Pontymason Lane, beyond which is further residential development, including additional housing forming Pontymason Rise and Pontymason Close. The Monmouthshire and Brecon Canal and Conservation Area as well as the Oaktree Cottage form the northern boundary and are separated from the site by a strong vegetation buffer, whilst beyond the western boundary are a number of fields, woodland and residential properties at Woodland Drive which separate the site from the Newport Administrative boundary and Risca beyond.

2.2 The site is within a sustainable location close to a good range of facilities including a post office, shops, restaurants, places of worship and employment areas that are all within reasonable walking and cycling distance. Rogerstone Primary School (1.2km) and Bassaleg Secondary School (2.8km) are also conveniently located.

2.3 In regard to public transport regular bus services run along Risca Road providing both links between Newport and Risca/Pontymister Tesco as well as between Newport and Blackwood. Furthermore Rogerstone railway station is within 800m of the site and forms part of the Ebbw Valley line providing an hourly service Monday to Saturday between Cardiff Central and Ebbw Vale Parkway.

#### 3.0 Compliance with Deposit LDP

3.1 The acceptability of the site for inclusion within the housing allocations set out in Policy H1 and its compliance with the policy of the Deposit LDP are identified in separate submissions as briefly outlined below:

**Housing Requirement**

3.2 As detailed within the separate submissions made in relation to Policy H1 - Housing Sites there is clear need to provide further residential allocations. It is noted that due to concerns over deliverability of some of the proposed allocated sites as well as the requirement to meet local needs as set out within the Local Housing Market Assessment the housing land supply is inadequate to meet the identified 10,350 dwellings.

3.3 Therefore, it is evident that appropriate new housing allocation sites will be required to provide land which is immediately available and within a sustainable location. In this case the site at Risca Road would actively assist in providing a deliverable housing site to address the identified shortfall.

**Settlement Boundary**

3.4 As detailed within separate representations made on Policy SP5 - Countryside, it is wholly appropriate for the modest extension to the settlement boundary at Rogerstone. This extension will assist to accommodate additional housing development in order to provide a greater degree of flexibility within the plan to accommodate growth overall.

**Green Wedge**

3.5 Within separate representations made in relation to Policy SP7 - Green Wedge it is recommended that the site be removed from the (ii) Rogerstone and Risca Green Wedge as due to the site characteristics and location it is not necessary to serve the function and would not be to the detriment to the remaining Green Wedge.

4.0 Development Framework Document

4.1 In considering the above policies and in order to assist with establishing the most appropriate sites for further residential development a supporting Development Framework Document has been prepared for the site at Risca Road.
4.2 The Development Framework Document incorporates the results of a broad ranging assessment of environmental and other matters. It outlines the proposed development concept which responds to the assessments carried out and provides a masterplan to illustrate that the development of the site provides a logical choice for approximately 35 dwellings. It is therefore evident that the development of the site will seek to meet the housing need through the housing the Development Plan period within the sustainable settlement location.

5.0 Required Change

5.1 That the land at Risca Road, Rogerstone is allocated for housing development within Policy H1 as a new site for 35 dwellings in order to meet the needs of the local community.

12

12

Speaking at Public Examination

Yes

Due to the significant issues raised in the attached representations.

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<thead>
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<th>Council Responses</th>
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The response to comments made on Policy H1 Housing Provision can be viewed against representation 1418.L4
### Representation Details

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<td>- Cardiff</td>
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Document: Revised LDP, p.22

Policy: SP07

Summary: Land at Risca Road, Rogerstone should be removed from the Green Wedge.

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by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M

Rep'n/Para/Policy  Representor  Agent  Accession No  Date Lodged  Late?  Source  Type  Mode  Status  Status Modified

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<td>1.2 Inclusion of this land within the Green Wedge results in the Deposit Local Development Plan being unsound in terms of the following tests of soundness:</td>
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<td>- C2 in that the Green Wedge boundary is not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales;</td>
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<td>- CE2 in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base in terms of future housing needs;</td>
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<td>- CE4 in that the Green Wedge does not provide a reasonable level of flexibility to allow the plan to deal with future circumstances.</td>
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2.0 Amplification

Planning Policy Wales

2.1 Paragraph 4.8.12 of Planning Policy Wales (2011 5th Ed) describes how, in defining Green Wedges it is "important to include only land that is strictly necessary to fulfil the purposes of the policy. Factors such as openness, topography and the nature of urban edges should be taken into account".

2.2 Furthermore, at paragraph 4.7.13 Planning Policy Wales states that "As with Green Belts, when considering green wedges local planning authorities will need to ensure that a sufficient range of development land is available which is suitably located in relation to the existing urban edge and the proposed green wedge."

Housing Numbers

2.3 As detailed within the separate submissions made in relation to Policy H1 - Housing Sites there is clear need to provide further residential allocations. It is noted that due to concerns over deliverability of some of the proposed allocated sites as well as the requirement to meet local needs as set out within the Local Housing Market Assessment the housing land supply is inadequate to meet the identified 10,350 dwellings. Therefore, appropriate new housing allocation sites will be required to provide land which is immediately available and within a sustainable location, such as Risca Road, Rogerstone.

Site Characteristics

2.4 As PPW outlines that land should only be included within a Green Wedge where it is strictly necessary. Given that there is evidence for additional housing sites it is therefore considered that due to the site location and characteristics the land at Risca Road, Rogerstone is suitable for removal from the Green Wedge and should be allocated for residential development.

2.5 With regard to the site characteristics a detailed description is provided within the supporting Development Framework Document, however in relation to the removal of the site from the Green Wedge the following characteristics are highlighted:
- The site adjoins the existing settlement boundary of Rogerstone and is bound to the south and east by existing residential development;
- Given that the site is located some 240m back from the existing development limit of the settlement of Rogerstone, as defined by the line of properties fronting onto Risca Road and Woodland Drive, a sufficient Green Wedge buffer would remain and continue the separation of Rogerstone and Risca;
- As the site adjoins the settlement boundary any new housing would be nestled into the lower lying visually well enclosed land immediately behind the existing residential dwellings;
- In considering the adjoining Monmouthshire and Brecon Canal it is evident that the site is positioned at a much lower level, and the principle of residential development adjoining the canal has been established by the recent residential development at Pontymason Rise and Great Oaks Park;
- The site allows a controlled expansion of the urban area, providing a logical rounding off of the settlement which can be achieved by adopting a sensitive design for the site.

2.6 Overall it is considered that the site characteristics allow for removal of the site for development without being to the detriment to the remaining Green Wedge.

2.7 Furthermore, taking in to consideration the above and separate representations made to the omission of the site for housing under Policy H1, the requirement to increase the housing provision set out in Policy H1 and in relation to the settlement boundary as per Policy SP5, it is clear that the site is suitable for residential development and in order to address the higher housing requirement there is a need to allow modest extensions to the settlement boundary and removed the site the site from the Green Wedge.

Required Change

3.1 That the Green Wedge (ii) Rogerstone and Risca be amended by omitting the land at Risca Road, Rogerstone.  

12/02/2014
Newport City Council Local Development Plan

Representation Details

by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M
by: (No grouping)

Rep’n/Para/Policy     Representor     Agent     Accession No     Date Lodged     Late?     Source     Type     Mode     Status     Status Modified

12 12 Speaking at Public Examination

Due to the significant issues raised in the representations.

Item Question

2 2 Soundness of LDP

Tick-box reply

Council Response

No change. The site is within proposed Countryside and Green Wedge allocations.

The plan seeks to promote the reuse of brownfield sites in preference to extensive use of greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities. The forecast housing need has been assessed in the context of population and employment projections and current market realities. The plan allocates sufficient land to meet this requirement.

Additional housing allocations in a countryside location cannot therefore be justified. Furthermore, the release of the representation site for housing would be contrary to the Council’s strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

A background paper ‘Delivery and Implementation’ has been produced to expand on the information supplied in Chapter 13 of the Deposit LDP. This sets out the proposed phasing, constraints and infrastructure requirements for each allocation. The Delivery of each site is considered here, setting out the justification for its continuation in the plan based on evidence from developers and landowners. Some of the large brownfield sites allocated within the previous Unitary Development Plan have started construction e.g. Glan Llyn with 4000 homes and employment uses on the site. The impact on development by the economic recession is to be considered and the plan takes a long term view across the entire plan period.

The LDP sets out a strategy for growth which allocates an adequate supply of land for residential and employment uses. The supply of this land is not concentrated in one area but across the City. It is recognised that growth in the east is significant but the west has not been overlooked with large brownfield sites allocated at Novelis, former Whitehead Works and Monmouthshire Bank Sidings. The review of village boundaries has clearly considered the need for expansion in these areas and following their assessment boundaries have been tightened and allocations resisted due to the unsuitability of sites proposed in these unsustainable locations.

Notwithstanding the representation submitted in support of this site, the Council maintains the position that the LDP is sound and relies on the evidence which supports it. In this respect, the Council does not support this site. The Green Wedge should therefore remain.

In relation to the appropriateness of the site for inclusion in the Green Wedge allocation it is considered the allocation of this area is in accordance with the purpose of Green Wedge as set out in Planning Policy Wales. The area of land does serve to prevent the coalescence of two settlements (Rogerstone and Risca), assists in safeguarding the countryside from encroachment, and protects the setting of an urban area.

It is also considered that the allocation of this area is in accordance with Planning Policy Wales in that normal planning and development management policies cannot provide the necessary protection (a countryside designation would not have the same level of control over certain types of development for example extensions to houses). It is considered that only land that is strictly necessary to fulfil the purposes of the policy has been provided in the designation based on the purpose of Green Wedge as identified in PPW.

Piecemeal removal of parts of the Green Wedge within the boundary of Newport would serve to undermine the intention of the various Green Wedge designations in both authority areas.
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Document: Revised LDP, p.21
Policy: SP05
Summary: Exclude Land at Risca Road, Rogerstone from the Countryside designation.

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Risca Road, Rogerstone.
1.0 Introduction
1.1 Pontymister Development Ltd objects to the inclusion of land at Risca Road within the Countryside and the omission from within the settlement boundary of Rogerstone. The land concerned is shown on the attached plan.

1.2 Omission of this land from the settlement boundary results in the Deposit Local Development Plan being unsound in terms of the following tests:
- C2 in that the settlement boundary is not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales;
- CE2 in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base in terms of future housing needs; and
- CE4 in that the restrictive settlement boundary does not provide a reasonable level of flexibility to allow the plan to deal with future circumstances.

2.0 Amplification
2.1 Housing Requirement
2.1.1 As detailed within the separate submission made in relation to Policy H1 - Housing Sites there is clear need to provide further residential allocations. It is noted that due to concerns over deliverability of some of the proposed allocated sites as well as the requirement to meet local needs as set out within the Local Housing Market Assessment the housing land supply is inadequate to meet the identified 10,350 dwellings.

2.2 Therefore, it is evident that appropriate new housing allocation site will be required to provide land which is immediately available and within a sustainable location. In this case the revision to the settlement boundary at Rogerstone to incorporate the site at Risca Road would actively assist on providing a deliverable housing site to address the identified shortfall.

Planning Policy Wales
2.3 In the context of the requirement for additional housing sites it is evident that there is a need to allow greater flexibility with the settlement boundary and seek to allocate further housing sites at appropriate locations.

2.4 As part of a sound Plan, Local Planning Authorities, in identifying sites to be allocated for housing should have regard to the principles of the search sequence as outlined within Paragraph 9.2.8 of Planning Policy Wales (2012 5th Ed). The paragraph outlines that Authorities should start with the reuse of previously developed land and buildings within settlements, then settlement extensions and then new development around settlements with good public transport links.

2.5 Given that a number of the existing allocated sites are on previously developed land and are constrained the Authority should seek to allocate sites within logical settlement extensions as per the next stage within the search sequence.

2.6 In doing so regard should be had to paragraph 9.2.9 of PPW which provides relevant criteria which Local Planning Authorities should consider in deciding which sites to allocate for housing.

2.7 The characteristics and location of the site at Risca Road accords with the relevant criteria in order to provide a sustainable settlement extension:
- The site immediately adjoins the settlement boundary of Rogerstone and is subject to urban influences;
- The extension of the settlement to provide residential development would be wholly compatible with the with neighbouring established land uses;
- Development of the site is not constrained by physical or environmental issues;
- The site is accessible to jobs, shops and services by modes other than the car, and
- The site is located where the capacity of existing and potential infrastructure, including public transport, water and sewerage, other utilities and social infrastructure, are available.

2.8 The principles and criteria as set out in Planning Policy Wales have been taken into consideration with the preparation of a Development Framework Document.

3.0 Development Framework Document
3.1 In order to assist with establishing the most appropriate settlement extension sites a Development Framework Document to support the site at Risca Road as a housing allocation site and the consequent inclusion within the settlement boundary of Rogerstone has been prepared.

3.2 The Development Framework Document incorporates the results of a broad ranging assessment of environmental and other matters. It outlines the proposed development concept which responds
to the assessments carried out and provides a masterplan to illustrate that the development of the site can contribute to meeting the housing need through the Development Plan period within the sustainable settlement location.

4.0 Required Change
4.1 That the site at Risca Road be removed from the Countryside and the settlement boundary for Rogerstone be amended to include land to the as shown on the attached plan.

12 Speaking at Public Examination
Due to the significant issues raised in the representation.

Item Question  Council Responses
2 2 Soundness of LDP

No change. The site is identified as Green Wedge and Countryside in the Revised Deposit Local Development Plan.

13 Council Response

There are a number of environmental constraints associated with the site including a SINC designation and a South East Wales Biodiversity Records Centre record. The forecast housing need has been assessed in the context of population and employment projections and current market realities. The plan allocates sufficient land to meet this requirement. The allocation of land for housing is considered to provide sufficient range and choice in order to ensure sufficient housing can be delivered. Additional housing allocations in a rural location cannot therefore be justified. Furthermore, the release of the representation site for housing would be contrary to the Council’s strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8. The plan seeks to promote the reuse of brownfield sites in preference to extensive use of greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities.

A background paper ‘Delivery and Implementation’ has been produced to expand on the information supplied in Chapter 13 of the Revised Deposit LDP. This sets out the proposed phasing, constraints and infrastructure requirements for each allocation. The Delivery of each site is considered here, setting out the justification for its continuation in the plan based on evidence from developers and landowners. Some of the large brownfield sites allocated within the previous Unitary Development Plan have started construction e.g. Glan Llyn with 4000 homes and employment uses on the site. The impact on development by the economic recession is to be considered and the plan takes a long term view across the entire plan period.

The LDP sets out a strategy for growth which allocates an adequate supply of land for residential and employment uses. The supply of this land is not concentrated in one area but across the City. It is recognised that growth in the east is significant but the west has not been overlooked with large brownfield sites allocated at Novelis, former Whitehead Works and Monmouthshire Bank Sidings. The review of village boundaries has clearly considered the need for expansion in these areas and following their assessment boundaries have been tightened and allocations resisted due to the unsuitability of sites proposed in these unsustainable locations.

It is recommended that the site continues to be allocated as countryside and is therefore not included in the Local Development Plan as a housing site.
### Representation Details

**Document:** Revised LDP, p.65  
**Policy:** H01

**Summary:** Inadequate housing supply therefore Land at Risca Road, Rogerstone should be allocated for housing.

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**Candidate Site Name**

Risca Road, Rogerstone.
1.0 Introduction

1.1 On behalf of Mrs H E Murray, we object to the approach taken by the Deposit LDP towards housing supply.

1.2 In the first instance, we welcome the Council’s acceptance that the housing requirement must be considerably higher than envisaged in the previous Deposit version of the LDP. Indeed this represents a step change in the position at Newport and is important to the future economic and social well being of the City. This inevitably places a far greater emphasis on the delivery of sites for housing otherwise there will be far reaching implications for the City and its residents.

1.3 We are seriously concerned that whilst the requirement has significantly increased, the housing land supply has remained largely the same as within the earlier version of the LDP. Indeed, the strategy remains reliant upon dwellings being provided at sites that are subject to a range of constraints and have historically failed to deliver. PPW (9.2.3) is clear that “sites must be free, or readily freed, from planning, physical and ownership constraints, and economically feasible for development, so as to create and support sustainable communities where people want to live. There must be sufficient sites suitable for the full range of housing types.”

1.4 We do not consider that the supply proposed complies with these fundamental requirements. Indeed, the failure of constrained sites to deliver would have significant consequences on the Local Area. Given that it is the Welsh Ministers main priority to deliver housing, it is our view that greater emphasis must be placed on ensuring a deliverable and implementable supply of land for housing rather than continued reliance upon sites that have remained undeveloped over successive plan periods.

1.5 Based on our consideration of the Plan in relation to National Policy requirements, it is our view that the proposed Focussed Changes made in relation to the above are contrary to the following tests of soundness:
-CE1 in that the housing provision strategy does not flow logically from the proposed strategy of the plan and are not related to each other;
-CE2 in that the housing strategy is not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales. There is no flexibility to deal with the failure of sites to be brought forward for development;
-CE4 in that restricting the level of housing available during the plan period does not provide a reasonable level of flexibility to allow the Plan to deal with higher population, employment growth and household growth and to meet local needs.

2.0 Land Supply Analysis

It is our view that there are numerous and significant weaknesses within the housing land supply that go to the heart of the Plan and render it unsound, in summary these are:

Housing Land Supply

In the first instance we draw attention to the under provision of housing during the UDP period (c. 360 dwellings) and secondly to the shortfall to date (April 2011 to April 2012 - 24 months) in the LDP period. Just 12 years into the LDP period based on these matters there is already a cumulative under provision of over 1,100 dwellings. Absent a significant source of readily available land for development it is likely that this level of under provision will increase as the same sites are relied upon for the LDP.

2.3 Given that the housing requirement has significantly increased and there are no material changes to the land supply position. If the 2012 JHLAS were re-run in the basis of the LDP requirement, then the land supply would decrease to less than five years.

Sites subject to constraints

We note that there are a number of sites that are subject to constraints yet are relied upon by the LDP. Indeed, these sites are vital to the delivery of the LDP but have been in the JHLAS for considerable time with no sign of development, some are categorised as 3(i) due to constraints, some are apartments for which there is limited demand and others are simply not viable for development. In addition there are a number of sites which are subject to the signing of a section 106 agreement which has constrained delivery for some time. We do not believe that these sites can be relied upon in order to contribute towards the housing requirement.

2.5 The following sites are examples of the inherent problems within the supply:

Site
1 Adjacent to Mcready's 54
2.6 We have serious concerns over the ability of the Llanwern site to be developed at the level envisaged within the plan (i.e. contributing over 2,748 dwellings during the plan period). Indeed, historically, there have been numerous delays that have continually postponed development and it is plainly not contributing the level envisaged in the latest JHLAS.

2.7 Indeed, we believe that based on present evidence if the overestimation persists, then the site will deliver at least 1,000 dwellings fewer than the level envisaged. This represents a major threat to the soundness of the plan.

Range and Choice

2.8 We note that National Guidance contained within PPW (5th Edition) requires that LDPs to provide a range of and mix of house types in places where people want to live. The present strategy is predicated upon large brownfield sites in and around the city centre and to the east of the City. This fails to consider the smaller scale needs of existing communities around the city and the desire of local people to continue to live within existing communities rather than as part of larger brownfield regeneration schemes in less attractive parts of the City.

Sites subject to s106

2.9 We do not consider that those sites that are subject to s106 can be relied upon to contribute during the plan period.

Windfall Allowance

2.10 There is presently reliance upon a significant number of windfall sites being brought forward. We note however, that a significantly number of the constrained land supply within the various tables are themselves winfall sites that have remained and subsequently become allocated but undeveloped. Accordingly, we believe that caution must be exercised in the contribution that such sites will make.

Flexibility allowance
2.11 Given the fundamental problems with the land supply identified and shortfall that it will result in, it is of fundamental importance that a flexibility allowance is identified. Indeed, in its present form the strategy lacks any flexibility to deal with the large number of constrained sites not being brought forward.

2.12 It is our view that in light of the significant problems identified, the contingency should be in line with the level of flexibility within the previous version of the LDP.

3.0 Consequences of failing to provide an adequate housing supply

3.1 As noted, the Strategy in its present form lacks any flexibility to deal with the failure of a small number of large sites to come forward. Given the known constraints and historic under-delivery, it is important that the sufficient housing is identified. Indeed, the consequences of the failure of the housing supply to meet requirements will be far reaching and undermine future aspirations for Newport.

3.2 Hardisty Jones Associates (HJA) have prepared an analysis on behalf of Pontymister Developments Ltd on the consequences of the failure of the housing land supply to be realised. They have based their considerations on the Assessment of Housing Requirements report prepared by Nathaniel Licfield and Partners for Newport City Council.

3.3 Both the Newport Community Strategy and Local Housing Strategy set out an ambition to see Newport as a prosperous and thriving city. The Revised LDP has a vision of a lively, dynamic, growing City. The delivery of sufficient housing is central to achieving these visions in a sustainable manner, as set out within the LDP and the supporting NLP report (Assessment of Housing Requirements, February 2013, NLP). Indeed, the NLP report makes multiple references to the need to align housing and economic objectives in order to deliver and enable a sustainable and sound LDP, including:

*Alignment of housing and economic and policy objectives is essential to ensuring sustainable development and support for growth ..........(alternative lower growth scenarios) .....fail to reflect the level of economic growth that is forecast and, as such, would compromise the deliverability of the economic vision for the area" [para 3.22, NLP].

*This consistency between employment and housing policies will be important in ensuring that the Plan can be found to be sound" [para 3.28, NLP].

*To achieve balanced and well-distributed growth economic policies must align with policies seeking the future development of houses in the area*. [para 4.10, NLP]

3.4 Plainly the failure to deliver sufficient housing within Newport over the LDP period has implications for economic, social and environmental sustainability.

Economic Sustainability

3.5 Firstly, there will be a reduction in the scale of economic and employment growth achieved in Newport over the LDP period if lower levels of housing than planned are delivered. Paragraphs 1.18 and 1.27 of the Revised LDP note there is a direct relationship between job creation in the construction sector and the building of houses. Without sufficient activity there will be an impact on the potential to achieve 7,400 jobs over the plan period.

3.6 Secondly, on a more general level, there is an important relationship between the provision of housing, the growth of the workforce and the attraction and achievement of economic growth. As NLP note:

"...the delivery of sufficient housing for the (expanding) workforce represents an essential element in ensuring that economic growth can be attracted and sustained."[para3.23, NLP]

3.7 Thirdly, and related to the second point above, there will be implications for the sustainable supply of labour without sufficient housing to attract and retain a population of working age. The NLP report highlighted the importance of positive net-migration to provide an appropriate demographic structure to support sustainable growth:

*Migration can be considerable benefit for the social and economic well-being of an area. It helps to ensure that the area benefits from a balanced mix of people of all age groups, including those of working age that are able to work within the local area. As such, it can contribute towards a more balanced and economically functional society. It is important to acknowledge these benefits and to respond to them by making adequate provision for the future needs of migrants, including housing."[para3.8, NLP]

*Taking account of the assumptions that have been made (and tested) regarding unemployment, economic activity and commuting, it is evident that if NCC is to deliver its growth aspirations then it will be essential to plan for and provide for net inward migration".[para 3.9, NLP].

3.8 In order to secure the economic ambitions of the LDP and wider policy and strategy documents for Newport there is a need to deliver sufficient housing.
Social Sustainability

3.9 There are two important elements of social sustainability related to housing provision.

3.10 Firstly, a failure to provide sufficient housing will hinder the formation of new households and/or limit the housing choices available to new households. This can happen in a number of ways. Directly, insufficient housing limits the number of households that can be accommodated in the city. Indirectly, it can lead to increases in house prices as demand outstrips supply, limiting access to housing that is affordable. The implications will vary from case to case, but may force homebuyers to look further afield, away from friends and family and with commensurate implications on travel to work (see below), or may lead to households failing to form, for example young people in their twenties and thirties continuing to reside within the parental home. All of these outcomes have social implications and restrict opportunities.

3.11 Secondly, a lower provision of housing will impact upon the level of affordable housing that can be delivered in the city over the plan period. The Newport Community Strategy sets out a need to deliver affordable housing as part of its vision to ensure opportunities for all. This is set against an historic backlog in terms of affordable housing delivery, with the NLP report indicating a "significant unmet housing need in Newport" [para 3.33 bullet 6, NLP].

Environmental Sustainability

3.12 Without an adequate locally resident workforce employers will be reliant upon commuters to fill vacancies. This will put pressure on transport infrastructure and, given the ongoing reliance on the private motor car, is likely to lead to less environmentally sustainable outcomes. The NLP report states that:

"...if the housing requirement was set to reflect the demographic scenarios alone, then there is a risk that the housing and employment elements of the LDP would not be joined up and the economic growth that is anticipated would be reliant upon a substantial increase in commuting into the area, it it was to be achieved. Such an approach would not be sustainable and would raise fundamental questions regarding the soundness of the resultant strategy."[para 4.9, NLP]

3.19 In conclusion therefore it is vital that housing and employment is aligned in policy, and that in addition, housing is delivered in order to enable the sustainable economic growth that is so necessary. Indeed, this similar conclusion is reached by NLP in its advice to the Council:

"Alignment of housing and the economy is therefore essential to ensuring sustainable development and support for growth.....the delivery of sufficient housing for the (expanding) workforce is essential to ensuring that economic growth can be attracted and sustained ..."[para 4.11, NLP]

4.0 Required Change

4.1 It is considered that to make the plan sound additional land will be required to be identified for housing. To that extent the land at The Griffin, Bassaleg is considered acceptable to accommodate some of the required shortfall. It is readily available, free from constraints and related to an existing sustainable community where people want to live.

4.2 The supporting Development Framework Document which has been prepared in relation to Risca Road summarised the technical reports and information which has been prepared to support the allocation as a logical choice for housing for approximately 35 dwellings.

4.3 It is evident from the assessments undertaken as part of the Development Framework Document and the separate submissions made to the Deposit LDP in regards to Policy SP5 - Countryside, H1 - Housing Site (Allocation) and SP7 - Green Wedge, that there are no overriding constraints to the development of the site. Furthermore given that the site is without contamination issues and large infrastructure requirements it is immediately available and would assist Newport in providing short term sites to provide for Newport's immediate housing needs as detailed above.

4.4 Taking this into consideration an appropriate masterplan has been prepared as part of the Development Framework Document to illustrate the development opportunities and benefits which can arise and to demonstrate that an allocation at The Griffin within the settlement of Bassaleg is deliverable. In this regard the allocation at The Griffin will assist in providing certainty over deliverability and housing supply within the plan period together with alternative range and choice.

5.0 Conclusion

5.1 In the first instance, we welcome the significant progress taken by Newport Council in recognising that there is a need to establish a significant housing requirement and the benefits that this can bring. However, we believe that the supply in inherently problematic and is not capable of delivering the level of housing required.
5.2 The housing land supply is inadequate to meet the identified 10,350 dwellings. We have a number of significant concerns:
1. There is already a cumulative under provision of housing amounting to over 1,100 houses in the first 18 months of the LDP period and including the shortfall from the UDP;
2. The sites identified as being available during the plan period will not deliver the necessary completions. Many have been around for some considerable time and are subject to constraints that there is no indication can be overcome;
3. The estimation of delivery at Llanwern is significantly overstated when based on historic delays, constraints and progress to date;
4. An element of supply is subject to S106 agreements being signed. Given the already significant delays such sites cannot be robustly considered to be deliverable.
5. There is no flexibility allowance for non-implementation which is likely to be a significant problem.

5.3 It is considered that additional readily available housing sites will be required for development. As such, land at Risca Road should be allocated for development.
Support for the growth strategy noted.

Justification of Requirement
Following representations at the Deposit LDP stage the housing requirement figure has been justified and increased from the proposed Welsh Government Population projections. There is scope for an authority to deviate from the WG population projections but this deviation is required to be well evidenced. The NLP assessment sets out this evidence base and illustrates that Newport, as one of the few areas in Wales with an anticipated population increase noted in the Census, is set to grow and reflects the Council’s policy aspiration for growth. It should be recognised that the majority of the sites (46 of 55) have planning permission or permission subject to a Section 106 agreement. The Council Response

As noted above, the Plan identifies its housing requirement for the plan period based on an assessment of need and this is also true of its employment land requirements. The clear strategy for the Plan is for growth and it will be through the successful implementation of the policies of the Plan that this will be achieved. There is a clear link between housing supply and economic growth which is why the supply will be monitored annually.

Reliance on previous Development Plan sites
The Local Development Plan does have a number of housing sites which were identified within the Unitary Development Plan. In total there are 15 of the 55 housing sites which continue into the new plan. The majority of these sites have progressed significantly from the UDP, as noted below:

1. Land adj. McReadys. As of 1st April 2013 the developer is on site preparing the site for development.
2. Eastern Expansion Area. Planning permission has been granted with a signed Section 106 agreement. Gallagher Estates have confirmed through the JHLAS process that they will be delivering units on site in 2015.
3. Glebelands. This site has an extant planning permission associated with the school site adj to the residential area. The land has recently been sold to a developer.
4. Monmouthshire Bank Sidings. Redrow are on site and progressing.
5. Traston Lane. The site has planning permission and the agent has confirmed that they anticipate development on the site in 2015.
6. Pirelli. This site has been sold to the Seren Group (RSL) who launched the development in September 2013.
7. Ty Du Works. An application is being considered by the Council for a new scheme on the site.
8. Farmwood Close. This is an historic site with a LDC for the implementation of 10 units which have not been completed. The land is currently being marketed.
9. City Vision. The developer is on site and progressing.
10. Trinity View. The developer is on site and progressing.
11. Glan Llyn. The developer is on site and progressing. A third developer (St Modwen) are anticipating to begin work on Phase 2 in 2015.
12. Mill Street. The site is owned by NCC who will market the site.
13. Herbert Road. This site is adjacent to the Glebeland site noted above. The site is compliant with the overall strategy of the LDP being a brownfield urban site in need of regeneration. There is no application on the site but the area land owner notes their intention to sell the site for development.
14. Whitehead Works. This site is part of a Welsh Government regeneration scheme, which anticipates delivery to begin in 2016.
15. Bideford Road. This site is compliant with the overall strategy of the LDP being a brownfield urban site with potential for regeneration. There is no application on the site but the area is the remaining part of a housing estate development.

The information above clearly shows that although there are a number of sites which have continued from one development plan to the other they have in the main progressed significantly or that they will be delivered within the plan period. It is also important to note that it was made clear through the UDP process that the growth proposed in the east of the city (i.e. Glan Llyn and Llanwern Village) was not anticipated to be delivered wholly within the UDP plan period.

Delivery in the east
Nonetheless the development rate anticipated over the plan period for the large housing development at Glan Llyn, is based on an annual review through the Joint Housing Land Availability Study (JHLAS) as required by National Planning Policy. The rates are considered appropriate and have been jointly agreed with the JHLAS study group which includes the development industry.

The Plan sets out the anticipated rate of delivery in Chapter 13 which illustrates that the total number of units is set to be delivered across the plan period. This in turn is established yearly through the
Joint Housing Land Availability Study and monitored annually within the AMR. The effects of the economic recessions are still being felt within the housing market so it is therefore of no surprise that the plan anticipates a lower growth in the first period of the plan compared to the final ten years.

Deliverability and Supply
The Plan does however provide enough land to ensure that a 5 year supply is met and, that although the annual build rate is higher than currently achieved, even when taking into account the residual method of calculation the Council has provided an adequate supply of land which has been agreed with the industry through the JHLAS process. In terms of Residual need it should be noted that the assessment of residential need takes into account the period 2011-2026. This takes into account the need of that period which would include the backlog from pre 2011 the proposed figures would result in double counting. It should also be noted that the residual method of calculation for the housing land supply will only be required to take into account those units not completed from 2011 onwards e.g. any provision under the required 690 units pa. It is also useful to note that sites subject to the signing of a section 106 will not be considered within the calculation of the 5 year land supply as noted in TAN1. It is useful to note that such sites have been deemed appropriate for development by the Council having been permitted planning permission subject to a legal agreement, therefore they have been identified within the plan as sites which are compliant with the plans strategy and are considered to be deliverable within the plan period.

As illustrated above the perception that the Plan is overly reliant on sites inherited from the UDP period is not well founded. In addition a number of the sites outlined by the developer as being undeliverable are in fact progressing e.g. Alcan. Not all the sites noted are counted as part of the housing supply due to the lack of evidence of deliverability e.g. Newport Athletic Club. The Council has been realistic in its approach to the housing supply set out in the Plan which is based on the annual JHLAS process to ensure that the sites can be delivered to ensure the strategy is met.

The rate of windfall sites is also questioned and as noted in Planning Policy Wales there is a need to consider the supply from such sites. The LDP based its figures on a review of the past trend of windfall supply which has been drastically cut to reflect the need for the Plan to remain flexible whilst concentrating growth on allocated housing sites and tight settlement boundaries. The plan will be monitored as to the percentage of houses developed on allocated housing sites to ensure that the housing policies of the plan are being effectively implemented.

Range and Choice
The supply of housing is considered to provide for a clear range and choice of housing which is a clear concern for many representors. The housing sites within the Plan are located across the City, with a clear focus on regeneration in the east as per the established strategy. The Plan provides a supply of affordable units for a mixture of needs as well as providing a mix of family homes and inner city living to cater for the broad housing market. The opportunity to provide homes in more rural locations has been investigated and there was no clear evidence to justify expansion to existing settlements. The Plan therefore has provided the opportunity for exception sites where such justification can be produced.

Flexibility
As the representation notes there is no set flexibility figure required for housing supply within development plans. However, during the examination of the Brecon Beacons National Park LDP WG noted a notional figure of 10% but that needed to reflect local circumstances. Other authorities within South East Wales have a range of 12-20% flexibility. It is good practice to allow for unknowns and the need for flexibility within a development plan is inherent from National Planning Policy. In Newport’s case the majority of the housing supply has planning permission or is being progressed. Those remaining 9 sites without planning permission are in line with the overall strategy or regeneration needs of the plan. Together they provide a 12% oversupply which is considered appropriate to enable to plan to cope with uncertainties that may arise over the plan period.

Strategy compliance and delivery.
It is considered that the plan provides a more than adequate supply of housing, both market and affordable, which is both deliverable and viable. Many of the sites have progressed since the Revised Deposit Plan was written and there is a steady supply of housing being achieved across Newport. The Plan identifies its housing and employment land supply for the plan period based on an assessment of need. The clear strategy for the Plan is for growth and it will be through the successful implementation of the policies of the Plan that this will be achieved. There is a clear link between housing supply and economic growth which is why the supply will be monitored annually.

This site forms part of candidate sites 2073.C1 and 2073.C2 and the following conclusion was reached when those sites were assessed at the candidate site stage.

The candidate site is a Greenfield site located outside of the urban area of Rogerstone. The site is identified as a Green Wedge and Countryside in the Deposit Local Development Plan.

There are a number of environmental constraints associated with the site including a SINC designation and a South East Wales Biodiversity Records Centre record.

The forecast housing need has been assessed in the context of population and employment projections and current market realities. The plan allocates sufficient land to meet this requirement. Additional housing allocations in a rural location cannot therefore be justified. Furthermore, the release of the representation site for housing would be contrary to the Council’s strategy of...
accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

The release of the representation site for housing would also be contrary to the Council’s strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

The plan seeks to promote the reuse of brownfield sites in preference to extensive use of greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities.

Notwithstanding the representation submitted in support of this alternative site at land off Risca Road, the Council maintains the position adopted at the Candidate Site stage and considers that the LDP is sound and relies on the evidence which supports it. In this respect, the Council does not support this Alternative Site.
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1. Introduction and Context

1.1 This statement has been prepared by GVA on behalf of Tata UK Steel Ltd (Tata) in response to the published Revised Deposit Newport Local Development (LDP). This statement accompanies the relevant completed Revised Deposit Plan Response Form(s) and should be read in conjunction with all previous representations made to the LDP process on behalf of Tata. Copies of these submissions are attached at Appendix 11 for clarity and ease of reference.

1.2 To a large extent, this statement reiterates the representations made to the Deposit Version of the Plan back in July 2012. However, given that we understand that these previous representations will not necessarily be considered by the Inspector as part of the LDP examination, we write again herein in response to this latest Revised Deposit Version of the Plan.

1.3 In general terms, we welcome the ‘partial’ recognition of the development opportunity that is presented by the Tata owned land at Llanwern, under the urban regeneration allocation EM2(ii), as well as the identification of the major road scheme (Policy SP16ii) at Queensway which will serve Glan Llyn and also provide a new strategic east-west link, providing relief for the M4.

1.4 The Council will be well aware of the significant opportunity that the Tata landholdings at Llanwern present following the representations made to all previous stages of the LDP process. In short our previous representations, particularly at the Major Candidate Site, Candidate Site and Deposit Plan stages, have sought to secure recognition of the Tata owned land at Llanwern as a gateway to Newport and south east Wales for new, improved and replacement facilities associated with New Llanwern to the north of Queensway.

1.5 Uses that have been suggested for this key site to the south of Queensway as part of the previous representations have included the following:

- General business and industry;
- Offices, research and development facilities;
- New Roads and infrastructure;
- Civic and institutional uses;
- Other mixed / commercial uses;
- Hotels and roadside uses;
- Waste recycling, energy and waste to energy facilities; and
- Potential residential uses.

1.6 As set out above, whilst we welcome the partial allocation of the Tata landholdings within the Revised Deposit Plan under Policy EM2(ii), our representations herein are mainly related to the fact that this allocation:

a) does not recognise the full development potential, and extent, of the Tata landholdings and the contribution this land could make to the aims and objectives of the LDP; and
b) does not include sufficient flexibility to allow a range of mixed use opportunities to be delivered over the LDP period, thus contributing to the future economic growth of the City.

1.7 Importantly, in conjunction with these two main objections, we also object to the Revised Deposit LDP Proposals Map which appears to include landscape designations that affect Tata’s landholdings at Llanwern, whilst excluding parts of their landholdings the land from the urban boundary and thus limiting the extent of the regeneration allocation under Policy EM2(ii) and employment allocation EM1(ii). Such landscape designations include the new Special Landscape Area (Caldicot Levels) identified under Policy SP8, as well as the Undeveloped Coastal Zone designation under Policy CE10. These landscape designations, and the omission of the land from the urban boundary (and the regeneration allocation), do not appear to correlate with the physical condition or use of our client’s land, nor indeed with the situation identified in the current adopted Newport Unitary Development Plan (UDP), or indeed the previous Deposit Version of the LDP. We therefore seek amendments to the East Newport Area Proposals Map of the Revised Deposit Plan.

1.8 It is our view that without the changes sought in these representations, the Revised Deposit LDP fails the following Tests of Soundness:

- CE1 – as the plan will not comprise a coherent strategy from which its policies and allocations can logically flow;
- CE2 – as the policies, and in particular allocations, are not realistic and do not fully consider the relevant alternatives and all credible evidence; and
- CE4 – in that the plan will not be flexible enough to deal with changing circumstances over the plan period – particularly in respect of the Tata land at Llanwern which will be at the centre of transformation associated with the East Newport Expansion.

1.9 We set out below our detailed representations, together with the alterations and amendments required to make the LDP sound. We begin by examining the East Newport Proposals Map (and associated designations, allocations and urban development limits) that affect the Tata landholdings at Llanwern, before moving on to examine the written policies of relevance in respect of the urban regeneration allocation EM2(ii) and employment allocation EM1(ii).

2. Proposals Map - East

2.1 As detailed in the introduction above, we welcome the allocation of part of the Tata owned land at Llanwern under Policy EM2 (ii), as identified on the Proposals Map - East. This positive allocation clearly recognises the development potential of Tata’s land and how it can positively contribute to the regeneration of this strategically important gateway location. This allocation, described in the Revised Deposit Plan as ‘Llanwern Former Tipping Area South of Queensway’, essentially identifies 122 hectares of land to provide for B1, B2 and B8 uses.

2.2 Notwithstanding this, it is evident that the Revised Deposit LDP does not include all of the Tata owned land put forward at the Candidate Site stages within this regeneration allocation. A copy
of the redline site plan submitted at the Candidate Site stage is included at Appendix 1 (Newport LDP Major Candidate Sites Submission) and identifies the full extent of Tata’s land at this location.

2.3 We note from the Council’s response to the Candidate Site Assessment (Candidate Sites Report, February 2012) that it considers that the operational steelworks site to the north of Queensway is not proposed for any change of use over the plan period. We also note that this area is located within the defined urban boundary in the Revised Deposit LDP and that the operational land is not affected by any landscape designations or allocations or policies of restraint. We do not therefore raise any issues with this treatment of the operational land to the north of Queensway and trust that any future development opportunities associated with the ongoing steelworks operations (or those that are ancillary to such uses) will be dealt with positively in line with the relevant employment related policies within the LDP.

2.4 However, there is a significant area of Tata’s land to the south of Queensway that has been excluded from the regeneration allocation under Policy EM2 (ii). Furthermore, there is a significant additional area of land (promoted as part of the Candidate Site process), located to the both west and east of the proposed allocation EM2 (ii) which appears to have been excluded from the urban boundary development limits defined by the Revised Deposit LDP. This area of land is, however, included within the development limits identified by the current adopted UDP. The exclusion from the urban development limits of an area of land that continues to form part of our client’s operations is unacceptable and we object to the Revised Deposit LDP on this basis.

2.5 In light of this, the part of our client’s operational land area (both to the east and west of allocation EM2(ii)) is identified as being outside the defined urban boundary in the Revised Deposit Plan and is also subject to the following designations:
- Undeveloped Coastal Zone; and
- Special Landscape Area.

2.6 We consider that such a situation ignores the historic context to this part of our client’s land and operations, as well as its current physical condition and use. The treatment of our client’s land in this manner also appears to ignore the potential future changes that the route of the safeguarded M4 relief road could bring to this part of Newport.

2.7 The Tata owned land that has been excluded from the defined development limits comprises the reed bed system that forms an integral and important part of the operational steelworks site to the north of Queensway. Simply put, the steelworks is reliant on the continued use of this system to discharge, and treat, all surface water and foul sewage produced by the works. The reed bed area at Greenmore, to the south of Queensway, is therefore part of the industrial operations that take place at the site, and should be included within the urban boundary (and subsequently excluded from the Undeveloped Coastal Zone and SLA) accordingly. To identify this area as being outside of the urban boundary (and consequently within a SLA and the Undeveloped Coast) is clearly at odds with the important role that this area plays in the functioning of the steelworks. This role is expected to continue over the lifetime of the LDP and needs to be fully recognised in the LDP.

2.8 There is also a risk that under the current policy / allocations identified in the Revised Deposit Plan that any works of repair or maintenance to the reed bed system could be in conflict with the policies of restraint associated with the proposed Undeveloped Coastal Zone and SLA designations. We trust that this is not the intention of the Revised Deposit Plan and therefore seek amendments to the plan to rectify this situation.

2.9 As stated earlier, the treatment of Tata’s land in this area in the Revised Deposit LDP is also not consistent with the position established in the current adopted UDP. The adopted UDP allocates the majority of the land to the south of Queensway as a waste allocation associated with the Steelworks, under Policy WD2. This area is all contained with the urban development limits of the UDP. A copy of the UDP Proposals map indicating the extent of the urban boundary is included at Appendix 2 for clarity.

2.10 The basic question is whether the reed bed area within the SLA is clear. As set out in our previous representations to the LDP process, the southern boundary of the Tata land (to the south of Queensway) is bordered by large electricity pylons that run in a predominantly east to west direction. It would be appropriate therefore to utilise the line of these pylons as the boundary between the developed / urban area to the north and the SLA to the south. Such an alignment would be consistent with the operational characteristics of the area and the situation in the adopted UDP. Importantly, it would also have regard to the safeguarded route of the M4 relief road which continues to be identified (and safeguarded) in the Revised Deposit Plan.

2.11 With regards to the M4 relief road, it is noted that the Revised Deposit LDP Constraints Plan for East Newport identifies land safeguarded for this to the south of Tata’s landholdings. It is suggested that this safeguarded route should be utilised as the boundary between the urban area (to the north of the safeguarded land) and the undeveloped open coast and Special Landscape Area (to the south of the relief road). At present, the Revised Deposit LDP Proposals Maps paint a confused picture by safeguarding land for the M4 relief road that is outside the urban area – land that is also within the SLA and undeveloped coastal zone in the latest iteration of the plan.

2.12 In light of this, we contend that the LDP urban boundary should be amended in line with our suggested approach above. We therefore request that the urban boundary limits are redrawn to reflect this (and mirror the position established by the adopted UDP). There appears to be no justification for the realignment of these urban limits established in the Revised Deposit LDP and the introduction of the SLA and Undeveloped Coastal Zone designations.

2.13 In summary, we consider that the following amendments are required to the Deposit Plan in order to rectify this situation:
- Redrawing of the urban boundary limits to the east and west of allocation EM2(ii) to reflect the urban boundary limits of the adopted UDP – this will ensure that the reed bed systems to the south of Queensway are included within the urban boundary limits; and
- Associated removal of Undeveloped Coastal Zone and SLA designations to the land which is to be included within the realigned urban boundary.

2.14 Such an approach would overcome our objections and provide the correct correlation between areas of landscape quality to be protected and the operational and intrinsic parts of the steelworks site. At present, the Revised Deposit Proposals Map fails to do this as it does not take account of the differences between the open areas to the south of the Tata land (south of proposed M4 relief road) and the operational / industrialised areas to the north of the proposed M4 relief road.

2.15 We therefore consider that the Proposals Map – East requires amendment – principally for the purposes of clarity – to ensure that Tata’s land (as promoted at Candidate Site stage) is included within the urban boundary and not the countryside (defined by Policy SP5) and excluded from the Undeveloped Coastal Zone (Policy CE10), and the Caldicot Levels Special Landscape Area.
3. Policy EM1(ii) – Employment Land Allocations
   3.1 We note that part of the Tata Landholding at Llanwern is no longer included within the employment allocation identified under Policy EM1(ii). This position in the Revised Deposit LDP differs significantly from the position in the previous Deposit Version of the LDP, and indeed the adopted UDP.
   3.2 The Deposit Version of the LDP identified this employment land allocation known as 'East of Queensway Meadows, South of Glan Llyn' for a total of 142 hectares of land, of which the Tata land comprises the south eastern part. The plan in Appendix 3 indicates the extent of the Tata owned land that formed part of this allocation in the Deposit Plan.
   3.3 However, it now appears that this land has been omitted from the employment allocation EM1(ii) in the latest Revised Deposit Plan, with the allocation only now comprising some 34 hectares of land, as opposed to the previous 142 hectares.
   3.4 It appears that this omission of the Tata land from allocation EM1(ii) is a response to representations that were made to the Deposit Version of the LDP by interested parties, seeking the deletion of allocation EM1(ii) from the LDP, as well as those seeking a major amendment to the site boundary (effectively reducing the employment potential of this area). The proposed deletion of the site was advertised as Alternative Site Reference AS(D)009 and the amendment as AS(A)029. We objected to these Alternative Site representations on the grounds that the exclusion of the site would make the LDP unsound and that theDeposit LDP is entirely sound with this allocation in place. Accordingly, we requested that the Alternative Sites AS(D)009 and AS(A)029 not be taken forward and that the land in question remained allocated in the plan going forward. However, it appears that the allocation has been substantially amended despite our representations to the contrary.
   3.5 The representations that sought the deletion and/or major amendment of this allocation related to concerns of nature conservation and impact on the SSSI. As previously detailed, these concerns are understood. However, it is considered that the inclusion of the Tata land within allocation EM1(ii) can take full account of such constraints and issues in any event. The wording of Policy EM1(ii) in the Deposit version of the plan made it clear that that proposals for this area would have to demonstrate that the national economic benefits of the proposals outweigh the environmental impacts, including visual intrusion and loss and damage to habitats and/or species, especially within the Nash and Goldcliff SSSIs. The supporting text contained within the Deposit version of the Plan also made it clear that developers will be required to demonstrate the national economic benefits of their proposal, as well as ensuring compliance with Environmental Impact Assessment Regulations and any requirements for a Habitat Regulation Assessment of these works as part of the planning process.
   3.6 In light of this situation, it is considered that the issues associated with the site’s development can be fully accounted for in a revised Policy context as per that set out in the Deposit version of the Plan. The diminished size of this employment allocation in the Revised Deposit Plan could potentially stifle the opportunity for Newport to secure large scale employment generating development over the period of the LDP which will be of a prestigious nature for the City. The importance of such potential should not be unduly lost by the downgrading and downsizing of this allocation ass is the case in the Revised Deposit Plan. The policy context set out in the Deposit Plan made it clear that full consideration will need to be given to nature conservation issues and impact on the sensitive area in which it is sited. This policy context also makes it clear that any future proposals for the site will need to meet strict and stringent tests of compliance and be of significant benefit to the city. It is therefore considered that this policy context should be reintroduced and for the allocation to be enlarged back to the 142 hectares identified within the Deposit Plan. This would include the Tata owned land that has been excluded from the Revised Deposit Plan.
   3.7 It is also important to note that this area of land that is now excluded from allocation EM1(ii) lies alongside the safeguarded route for the proposed M4 relief road. This area could, over the life of the LDP, experience significant change and transformation and be well placed to deliver employment development of national significance as new opportunities emerge. It is therefore considered important to safeguard such an opportunity, which cannot be delivered elsewhere (within such proximity to the M4) so that this strategic opportunity is not lost. Any development of the site would clearly need to take full account of special qualities of this area, as required by the plan in its current format. The employment allocation in the LDP should therefore revert back to the position established in the previous Deposit version of the Plan in order to secure the objectives and visions for the city as a whole.

4. Policy EM2(ii) – Regeneration Sites
   4.1 As set out above, we welcome the partial allocation of the Tata land under allocation EM2(ii) in the Revised Deposit Plan. This allocation identifies 122 hectares of land at the Llanwern former tipping area south of Queensway for B1, B2 and B8 uses. Such an approach is broadly consistent with the representations that have been made to the LDP process to date by Tata (copies included at Appendix 1). This allocation clearly recognises the significant opportunity presented by this gateway site and the significant changes that will be delivered to this part of Eastern Newport over the plan period.
   4.2 Whilst we welcome such recognition under allocation EM2(ii), we do not consider that this policy context is broad enough to fully take account of the development opportunity presented by the Tata site and landholdings.
   4.3 As detailed at both the Candidate (and Major Candidate) site submission stages, as well as the Deposit stage consultation, this area of Newport is due to undergo significant changes over the lifetime of the LDP, which can be summarised as follows:
      □ To the west, St Modwen has secured planning permission for a major new community on the site of the former heavy end* of the steelworks. A total of 4,000 new homes is proposed in a transformed landscape, together with a new local centre, and a new business park;
      □ The proposals will also significantly alter the accessibility of the area. The Queensway will become a public highway (as identified in the Revised Deposit Plan) and will connect the southern...
distributor road (at the retail park) to junction 23 of the M4. In addition, a new rail halt is proposed (at the junction of St Modwen’s site and New Llanwern), together with the provision for a 1,000 space park and ride facility.

4.4 In this light, it is felt that the urban regeneration allocation for this site would benefit from widening of the range of land uses that may be considered acceptable at the site, beyond those of the prescribed B1, B2 and B8 uses. It is felt that limiting the development of this site to these uses only could potentially unduly constrain development activity and not be flexible enough to accommodate other important and deliverable land uses over the plan period – uses that would both complement and enhance the wider regeneration initiatives within this part of Newport.

4.5 As set out in greater detail in our previous representations to the emerging plan (Appendix 1), we would therefore request that this policy be widened to include reference to the following uses (which formed part of our previous representations):

- Residential;
- Hotel and Roadside Uses;
- Energy and waste to energy facilities.

4.6 Such an approach would be consistent with the overall sustainability aims of the Revised Deposit LDP by ensuring that truly mixed use communities can be delivered at sustainable transport locations that are capable of delivering large scale redevelopment.

4.7 We would therefore suggest that the supporting text which accompanies Policy EM2 (ii) at paragraph 6.17 of the Revised Deposit Plan be amended to read as follows:

Llanwern Former Tipping Area South of Queensway

This area of land south of Queensway will provide a mixed use development opportunity that will capitalise on the changing nature of this part of the East Newport. The site will be suitable to accommodate a range of land uses including B1, B2, B8 and more specialist energy and waste related uses. The opening up of the Queensway and the potential M4 relief road could potentially facilitate other complementary uses such as roadside activities (hotels etc). Ancillary residential development may also be considered as part of a mix of land uses, subject to compliance with all relevant policies of the LDP.

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**Newport City Council Local Development Plan**

13 13 Council Response

The proposal to amend the settlement boundary is considered as Alternative Site RAS(A)27 in the Alternative Site Assessment.

The Council believes that the LDP provides ample regeneration land in its current form. The proposed enlargement, which would encroach on environmentally sensitive areas, would be both unnecessary and inconsistent with other policy objectives.

It was considered to ensure that the undeveloped coastal zone continued in a consistent fashion the boundary would be drawn to the settlement boundary. This designation reflects the unique natural and historical environment at Newport’s Coastal area, in line with the Shoreline Management Plan’s consideration of the coastal area of Newport and the many designations for the areas heritage, flood risk and ecology. The plan is developed with recognition to the Shoreline Management Plan for the Severn Estuary which identifies the need to protect the area because of its international nature conservation sites, residential development, critical infrastructure and Industrial, Commercial and Economic Assets. The area identified as undeveloped Coastal Zone reflects the sensitive coastal environment of the Caldicot Levels up until the Settlement Boundary which provides a clear distinction between the developed and undeveloped area. It is therefore considered that the undeveloped coastal zone area continues to follow the settlement boundary reflecting the unique environment at Newport’s coastal region.

Whilst it is noted that the reed bed system forms part of the operational steelworks site (as this is an existing situation) this is not prejudiced by the new allocation. However the allocation as countryside will serve to ensure control over future development.

With regards to the SLA boundary, this forms part of the extensive area of reclaimed marsh and wetlands that extends from Cardiff to Chepstow. Reaching up to 10 metres AOD, the area is characterised by its network of drainage ditches (reens), which vary in form and character. The eastern edge of the SLA is characterised by a regular, rectilinear pattern, whereas around Whitson and Caldicott the pattern is more sinuous. These variations reflect the different periods of reclamation and have a consequent effect upon settlement and road pattern. Particular examples are provided at Redwick, the largest nucleated village on the levels surrounded by a number of large orchards and at Whitson, where a distinctive linear pattern of settlement along the line of a street common is found.
### Representation Details

**Document:** Revised LDP, p.79  
**Policy:** EM01.02  
**Summary:** Increase the land allocation to 142ha as per the original deposit stage

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Additional material submitted
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1.3 In general terms, we welcome the ‘partial’ recognition of the development opportunity that is presented by the Tata owned land at Llanwern, under the urban regeneration allocation EM2(ii), as well as the identification of the major road scheme (Policy SP16ii) at Queensway which will serve Glan Llyn and also provide a new strategic east-west link, providing relief for the M4.

1.4 The Council will be well aware of the significant opportunity that the Tata landholdings at Llanwern present following the representations made to all previous stages of the LDP process. In short our previous representations, particularly at the Major Candidate Site, Candidate Site and Deposit Plan stages, have sought to secure recognition of the Tata owned land at Llanwern as a gateway to Newport and south east Wales for new, improved and replacement facilities associated with New Llanwern to the north of Queensway.

1.5 It is in the context of these previous representations and submissions that we respond to the latest expression of Policy in the Revised Deposit Plan.

1.6 As set out above, whilst we welcome the partial allocation of the Tata landholdings within the Revised Deposit Plan under Policy EM2(ii), our representations herein are mainly related to the fact that this allocation:

a) does not recognise the full development potential, and extent, of the Tata landholdings and the contribution this land could make to the aims and objectives of the LDP; and
b) does not include sufficient flexibility to allow a range of mixed use opportunities to be delivered over the LDP period, thus contributing to the future economic growth of the City.

1.7 Importantly, in conjunction with these two main objections, we also object to the Revised Deposit LDP Proposals Map which appears to include landscape designations that affect Tata’s landholdings at Llanwern, whilst excluding parts of their landholdings the land from the urban boundary and thus limiting the extent of the regeneration allocation under Policy EM2(ii) and employment allocation EM1(i). Such landscape designations include the new Special Landscape Area (Caldicot Levels) identified under Policy SP8, as well as the Undeveloped Coastal Zone designation under Policy CE10. These landscape designations, and the omission of the land from the urban boundary (and the regeneration allocation), do not appear to correlate with the physical condition or use of our amendments to the East Newport Area Proposals Map of the Revised Deposit Plan.

1.8 It is our view that without the changes sought in these representations, the Revised Deposit LDP fails the following Tests of Soundness:

- CE1 – as the plan will not comprise a coherent strategy from which its policies and allocations can logically flow;
- CE2 – as the policies, and in particular allocations, are not realistic and do not fully consider the relevant alternatives and all credible evidence; and
- CE4 – in that the plan will not be flexible enough to deal with changing circumstances over the plan period – particularly in respect of the Tata land at Llanwern which will be at the centre of transformation associated with the East Newport Expansion.

1.9 We set out below our detailed representations, together with the alterations and amendments required to make the LDP sound. We begin by examining the East Newport Proposals Map (and associated designations, allocations and urban development limits) that affect the Tata landholdings at Llanwern, before moving on to examine the written policies of relevance in respect of the urban regeneration allocation EM2(ii) and employment allocation EM1(i).

2. Proposals Map - East

2.1 As detailed in the introduction above, we welcome the allocation of part of the Tata owned land at Llanwern under Policy EM2(ii), as identified on the Proposals Map - East. This positive allocation clearly recognises the development potential of Tata’s land and how it can positively contribute to the regeneration of this strategically important gateway location. This allocation, described in the Revised Deposit Plan as ‘Llanwern Former Tipping Area South of Queensway’, essentially identifies 122 hectares of land to provide for B1, B2 and B8 uses.

2.2 Notwithstanding this, it is evident that the Revised Deposit LDP does not include all of the Tata owned land put forward at the Candidate Site stages within this regeneration allocation. A copy...
of the redline site plan submitted at the Candidate Site stage is included at Appendix 1 (Newport LDP Major Candidate Sites Submission) and identifies the full extent of Tata’s land at this location.

2.3 We note from the Council’s response to the Candidate Site Assessment (Candidate Sites Report, February 2012) that it considers that the operational steelworks site to the north of Queensway is not proposed for any change of use over the plan period. We also note that this area is located within the defined urban boundary in the Revised Deposit LDP and that the operational land is not affected by any landscape designations or allocations or policies of restraint. We do not therefore raise any issues with this treatment of the operational land to the north of Queensway and trust that any future development opportunities associated with the ongoing steelworks operations (or those that are ancillary to such uses) will be dealt with positively in line with the relevant employment related policies within the LDP.

2.4 However, there is a significant additional area of land (promoted as part of the Candidate Site process), located to the both west and east of the proposed allocation EM2(ii) which appears to have been excluded from the urban boundary development limits defined by the Revised Deposit LDP. This area of land is, however, included within the development limits identified by the current adopted UDP. The exclusion from the urban development limits of an area of land that continues to form part of our client’s operations is unacceptable and we object to the Revised Deposit LDP on this basis.

2.5 In light of this, the part of our client’s operational land area (both to the east and west of allocation EM2(ii)) is identified as being outside the defined urban boundary in the Revised Deposit Plan and is also subject to the following designations:
- Undeveloped Coastal Zone; and
- Special Landscape Area.

2.6 We consider that such a situation ignores the historic context to this part of our client’s land and operations, as well as its current physical condition and use. The treatment of our client’s land in this manner also appears to ignore the potential future changes that the route of the safeguarded M4 relief road could bring to this part of Newport.

2.7 The Tata owned land that has been excluded from the defined development limits comprises the reed bed system that forms an integral and important part of the operational steelworks site to the north of Queensway. Simply put, the steelworks is reliant on the continued use of this system to discharge, and treat, all surface water and foul sewage produced by the works. The reed bed area at Greenmore, to the south of Queensway, is therefore part of the industrial operations that take place at the site, and should be included within the urban boundary (and subsequently excluded from the Undeveloped Coastal Zone and SLA) accordingly. To identify this area as being outside of the urban boundary (and consequently within a SLA and the Undeveloped Coast) is clearly at odds with the important role that this area plays in the functioning of the steelworks. This role is expected to continue over the lifetime of the LDP and needs to be fully recognised in the LDP.

2.8 There is also a risk that under the current policy/allocations identified in the Revised Deposit Plan that any works of repair or maintenance to the reed bed system could be in conflict with the policies of restraint associated with the proposed Undeveloped Coastal Zone and SLA designations. We trust that this is not the intention of the Revised Deposit Plan and therefore seek amendments to the plan to rectify this situation.

2.9 As stated earlier, the treatment of Tata’s land in this area in the Revised Deposit LDP is also not consistent with the position established in the current adopted UDP. The adopted UDP allocates the majority of the land to the south of Queensway as a waste allocation associated with the Steelworks, under Policy WD2. This area is all contained with the urban development limits of the UDP. A copy of the UDP Proposals map indicating the extent of the urban boundary is included at Appendix 2 for clarity.

2.10 The basis of this re-allocation of the reed bed area within the SLA is unclear. As set out in our previous representations to the LDP process, the southern boundary of the Tata land (to the south of Queensway) is bordered by large electricity pylons that run in a predominantly east to west direction. It would be appropriate therefore to utilise the line of these pylons as the boundary between the developed/urban area to the north and the SLA to the south. Such an alignment would be consistent with the operational characteristics of the area and the situation in the adopted UDP. Importantly, it would also have regard to the safeguarded route of the M4 relief road which continues to be identified (and safeguarded) in the Revised Deposit Plan.

2.11 With regards to the M4 relief road, it is noted that the Revised Deposit LDP Constraints Plan for East Newport identifies land safeguarded for this to the south of Tata’s landholdings. It is suggested that this safeguarded route should be utilised as the boundary between the urban area (to the north of the safeguarded land) and the undeveloped open coast and Special Landscape Area (to the south of the relief road). At present, the Revised Deposit LDP Proposals Maps paint a confused picture by safeguarding land for the M4 relief road that is outside the urban area – land that is also within the SLA and undeveloped coastal zone in the latest iteration of the plan.

2.12 In light of this, we contend that the LDP urban boundary should be amended in line with our suggested approach above. We therefore request that the urban boundary limits are redrawn to reflect this (and mirror the position established by the adopted UDP). There appears to be no justification for the realignment of these urban limits established in the Revised Deposit LDP and the introduction of the SLA and Undeveloped Coastal Zone designations.

2.13 In summary, we consider that the following amendments are required to the Deposit Plan in order to rectify this situation:
- Redrawing of the urban boundary limits to the east and west of allocation EM2(ii) to reflect the urban boundary limits of the adopted UDP – this will ensure that the reed bed systems to the south of Queensway are included within the urban boundary limits;
- Associated removal of Undeveloped Coastal Zone and SLA designations to the land which is to be included within the realigned urban boundary.

2.14 Such an approach would overcome our objections and provide the correct correlation between areas of landscape quality to be protected and the operational and intrinsic parts of the steelworks site. As present, the Revised Deposit Proposals Map fails to do this as it does not take account of the differences between the open areas to the south of the Tata land (south of proposed M4 relief road) and the operational/industrialised areas to the north of the proposed M4 relief road.

2.15 We therefore consider that the Proposals Map – East requires amendment – principally for the purposes of clarity – to ensure that Tata’s land (as promoted at Candidate Site stage) is included within the urban boundary and not the countryside (defined by Policy SP5) and excluded from the Undeveloped Coastal Zone (Policy CE10), and the Caldicot Levels Special Landscape Area
3. Policy EM1(ii) – Employment Land Allocations

3.1 We note that part of the Tata Landholding at Llanwern is no longer included within the employment allocation identified under Policy EM1(ii). This position in the Revised Deposit LDP differs significantly from the position in the previous Deposit Version of the LDP, and indeed the adopted UDP.

3.2 The Deposit Version of the LDP identified this employment land allocation known as ‘East of Queensway Meadows, South of Glan Llyn’ for a total of 142 hectares of land, of which the Tata land comprises the south eastern part. The plan in Appendix 3 indicates the extent of the Tata owned land that formed part of this allocation in the Deposit Plan.

3.3 However, it now appears that this land has been omitted from the employment allocation EM1(ii) in the latest Revised Deposit Plan, with the allocation only now comprising some 34 hectares of land, as opposed to the previous 142 hectares.

3.4 It appears that this omission of the Tata land from allocation EM1(ii) is a response to representations that were made to the Deposit Version of the LDP by interested parties, seeking the deletion of allocation EM1(ii) from the LDP, as well as those seeking a major amendment to the site boundary (effectively reducing the employment potential of this area). The proposed deletion of the site was advertised as Alternative Site Reference AS(D)009 and the amendment as AS(A)029. We objected to these Alternative Site representations on the grounds that the exclusion of the site would make the LDP unsound and that the Deposit LDP is entirely sound with this allocation in place. Accordingly, we requested that the Alternative Sites AS(D)009 and AS(A)029 not be taken forward and that the land in question remained allocated in the plan going forward. However, it appears that the allocation has been substantially amended despite our representations to the contrary.

3.5 The representations that sought the deletion and/or major amendment of this allocation related to concerns of nature conservation and impact on the SSSI. As previously detailed, these concerns are understood. However, it is considered that the inclusion of the Tata land within allocation EM1(ii) can take full account of such constraints and issues in any event. The wording of Policy EM1(ii) in the Deposit version of the plan made it clear that that proposals for this area would have to demonstrate that the national economic benefits of the proposals outweigh the environmental impacts, including visual intrusion and loss and damage to habitats and/or species, especially within the Nash and Goldcliff SSSIs. The supporting text contained within the Deposit version of the Plan also made it clear that developers will be required to demonstrate the national economic benefits of their proposal, as well as ensuring compliance with Environmental Impact Assessment Regulations and any requirements for a Habitat Regulation Assessment of these works as part of the planning process.

3.6 In light of this situation, it is considered that the issues associated with the site’s development can be fully accounted for in a revised policy context as per that set out in the Deposit version of the Plan. The diminished size of this employment allocation in the Revised Deposit Plan could potentially stifle the opportunity for Newport to secure large scale employment generating development over the period of the LDP which will be of a prestigious nature for the City. The importance of such potential should not be unduly lost by the downgrading and downsizing of this allocation ass is the case in the Revised Deposit Plan. The policy context set out in the Deposit Plan made it clear that full consideration will need to be given to nature conservation issues and impact on the sensitive area in which it is sited. This policy context also makes it clear that any future proposals for the site will need to meet strict and stringent tests of compliance and be of significant benefit to the city. It is therefore considered that this policy context should be reintroduced and for the allocation to be enlarged back to the 142 hectares identified within the Deposit Plan. This would include the Tata owned land that has been excluded from the Revised Deposit Plan.

3.7 It is also important to note that this area of land that is now excluded from allocation EM1(ii) lies alongside the safeguarded route for the proposed M4 relief road. This area could, over the life of the LDP, experience significant change and transformation and be well placed to deliver employment development of national significance as new opportunities emerge. It is therefore considered important to safeguard such an opportunity, which cannot be delivered elsewhere (within such proximity to the M4) so that this strategic opportunity is not lost. Any development of the site would clearly need to take full account of special qualities of this area, as required by the plan in its current format. The employment allocation in the LDP should therefore revert back to the position established in the previous Deposit version of the Plan in order to secure the objectives and visions for the city as a whole.

4. Policy EM2(ii) – Regeneration Sites

4.1 As set out above, we welcome the partial allocation of the Tata land under allocation EM2(ii) in the Revised Deposit Plan. This allocation identifies 122 hectares of land at the Llanwern former tipping area south of Queensway for B1, B2 and B8 uses. Such an approach is broadly consistent with the representations that have been made to the LDP process to date by Tata (copies included at Appendix 1). This allocation clearly recognises the significant opportunity presented by this gateway site and the significant changes that will be delivered to this part of Eastern Newport over the plan period.

4.2 Whilst we welcome such recognition under allocation EM2(ii), we do not consider that this policy context is broad enough to fully take account of the development opportunity presented by the Tata site and landholdings.

4.3 As detailed at both the Candidate and Major Candidate site submission stages, as well as the Deposit stage consultation, this area of Newport is due to undergo significant changes over the lifetime of the LDP, which can be summarised as follows:

- To the west, St Modwen has secured planning permission for a major new community on the site of the former heavy end® of the steelworks. A total of 4,000 new homes is proposed in a transformed landscape, together with a new local centre, and a new business park;
- The proposals will also significantly alter the accessibility of the area. The Queensway will become a public highway (as identified in the Revised Deposit Plan) and will connect the southern...
distributor road (at the retail park) to junction 23 of the M4. In addition, a new rail halt is proposed (at the junction of St Modwen's site and New Llanwern), together with the provision for a 1,000 space park and ride facility.

4.4 In this light, it is felt that the urban regeneration allocation for this site would benefit from widening of the range of land uses that may be considered acceptable at the site, beyond those of the prescribed B1, B2 and B8 uses. It is felt that limiting the development of this site to these uses only could potentially unduly constrain development activity and not be flexible enough to accommodate other important and deliverable land uses over the plan period – uses that would both complement and enhance the wider regeneration initiatives within this part of Newport.

4.5 As set out in greater detail in our previous representations to the emerging plan (Appendix 1), we would therefore request that this policy be widened to include reference to the following uses (which formed part of our previous representations):

- Residential;
- Hotel and Roadside Uses;
- Energy and waste to energy facilities.

4.6 Such an approach would be consistent with the overall sustainability aims of the Revised Deposit LDP by ensuring that truly mixed use communities can be delivered at sustainable transport locations that are capable of delivering large scale redevelopment.

4.7 We would therefore suggest that the supporting text which accompanies Policy EM2 (ii) at paragraph 6.17 of the Revised Deposit Plan be amended to read as follows:

Llanwern Former Tipping Area South of Queensway

This area of land south of Queensway will provide a mixed use development opportunity that will capitalise on the changing nature of this part of the East Newport. The site will be suitable to accommodate a range of land uses including B1, B2, B8 and more specialist energy and waste related uses. The opening up of the Queensway and the potential M4 relief road could potentially facilitate other complementary uses such as roadside activities (hotels etc). Ancillary residential development may also be considered as part of a mix of land uses, subject to compliance with all relevant policies of the LDP.

4.8 We trust that this allocation will be amended to include reference to these additional uses and the LDP amended accordingly.

### Speaking at Public Examination

**12** Speaking at Public Examination

Wish to discuss the context to the site and the reasons for seeking the amendments to the allocation to the south of Llanwern Steelworks, and associated realignment of settlement boundary limits, employment allocations and other land allocations within this area. The issues and plan delineation for this are complex and best considered to be dealt with in person in order to fully explain the situation on the ground and the amendments sought.

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<tr>
<th>Item Question</th>
<th>Council Responses</th>
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<td>2 2 Soundness of LDP</td>
<td>No</td>
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**13 Council Response**

Significant areas of SSSI which were allocated as employment land at Original Deposit Stage have now been removed from the Plan. This refinement will help to protect the SSSIs. Prior to the removal of this land, Officers wrote to the Agent to request assurances with regard to the deliverability of the site. No delivery information was received, therefore the Council has no confidence that this area of land in SSSI would be delivered during the Plan Period. As a result, and due to the fact Newport has a sufficient amount of employment land, it was decided that this site area should be reduced and taken out the SSSI.
### Representation Details

Newport City Council Local Development Plan

Filtered to show: (all of) Stage=L; Status=M

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<th>Agent</th>
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<th>Source</th>
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Additional material submitted

**Document:** Revised LDP, p.81

**Policy:** EM02.02

**Summary:** Increase land use options to Residential, Hotel & Roadside Uses; Energy and Waste to Energy Facilities

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Llanwern Steelworks - 1420
1. Introduction and Context

1.1 This statement has been prepared by GVA on behalf of Tata UK Steel Ltd (Tata) in response to the published Revised Deposit Newport Local Development (LDP). This statement accompanies the relevant completed Revised Deposit Plan Response Form(s) and should be read in conjunction with all previous representations made to the LDP process on behalf of Tata. Copies of these submissions are attached at Appendix 11 for clarity and ease of reference.

1.2 To a large extent, this statement reiterates the representations made to the Deposit Version of the Plan back in July 2012. However, given that we understand that these previous representations will not necessarily be considered by the Inspector as part of the LDP examination, we write again herein in response to this latest Revised Deposit Version of the Plan.

1.3 In general terms, we welcome the ‘partial’ recognition of the development opportunity that is presented by the Tata owned land at Llanwern, under the urban regeneration allocation EM2(ii), as well as the identification of the major road scheme (Policy SP16ii) at Queensway which will serve Glan Llyn and also provide a new strategic east-west link, providing relief for the M4.

1.4 The Council will be well aware of the significant opportunity that the Tata landholdings at Llanwern present following the representations made to all previous stages of the LDP process. In short, our previous representations, particularly at the Major Candidate Site, Candidate Site and Deposit Plan stages, have sought to secure recognition of the Tata owned land at Llanwern as a gateway to opportunity for the Tata owned land to the south of Queensway, to accommodate a full mix of uses and activities over the lifetime of the LDP to reflect the changing nature of this key gateway location.

Uses that have been suggested for this key site to the south of Queensway as part of the previous representations have included the following:
- General business and industry;
- Offices, research and development facilities;
- New Roads and infrastructure;
- Civic and institutional uses;
- Other mixed / commercial uses;
- Hotels and roadside uses;
- Waste recycling, energy and waste to energy facilities; and
- Potential residential uses.

1.5 It is in the context of these previous representations and submissions that we respond to the latest expression of Policy in the Revised Deposit Plan.

1.6 As set out above, whilst we welcome the partial allocation of the Tata landholdings within the Revised Deposit Plan under Policy EM2(ii), our representations herein are mainly related to the fact that this allocation:

a) does not recognise the full development potential, and extent, of the Tata land holdings and the contribution this land could make to the aims and objectives of the LDP; and
b) does not include sufficient flexibility to allow a range of mixed use opportunities to be delivered over the LDP period, thus contributing to the future economic growth of the City.

1.7 Importantly, in conjunction with these two main objections, we also object to the Revised Deposit LDP Proposals Map which appears to include landscape designations that affect Tata’s landholdings at Llanwern, whilst excluding parts of their landholdings the land from the urban boundary and thus limiting the extent of the regeneration allocation under Policy EM2(ii) and employment allocation EM1(iii). Such landscape designations include the new Special Landscape Area (Caldicot Levels) identified under Policy SP8, as well as the Undeveloped Coastal Zone designation under Policy CE10. These landscape designations, and the omission of the land from the urban boundary (and the regeneration allocation), do not appear to correlate with the physical condition or use of our client’s land, nor indeed with the situation identified in the current adopted Newport Unitary Development Plan (UDP), or indeed the previous Deposit Version of the LDP. We therefore seek amendments to the East Newport Area Proposals Map of the Revised Deposit Plan.

1.8 It is our view that without the changes sought in these representations, the Revised Deposit LDP fails the following Tests of Soundness:

a) CE1 – as the plan will not comprise a coherent strategy from which its policies and allocations can logically flow;

b) CE2 – as the policies, and in particular allocations, are not realistic and do not fully consider the relevant alternatives and all credible evidence; and

c) CE4 – in that the plan will not be flexible enough to deal with changing circumstances over the plan period – particularly in respect of the Tata land at Llanwern which will be at the centre of transformation associated with the East Newport Expansion.

1.9 We set out below our detailed representations, together with the alterations and amendments required to make the LDP sound. We begin by examining the East Newport Proposals Map (and associated designations, allocations and urban development limits) that affect the Tata landholdings at Llanwern, before moving on to examine the written policies of relevance in respect of the urban regeneration allocation EM2(ii) and employment allocation EM1(iii).

2. Proposals Map - East

2.1 As detailed in the introduction above, we welcome the allocation of part of the Tata owned land at Llanwern under Policy EM2 (ii), as identified on the Proposals Map - East. This positive allocation clearly recognises the development potential of Tata’s land and how it can positively contribute to the regeneration of this strategically important gateway location. This allocation, described in the Revised Deposit Plan as ‘Llanwern Former Tipping Area South of Queensway’, essentially identifies 122 hectares of land to provide for B1, B2 and B8 uses.

2.2 Notwithstanding this, it is evident that the Revised Deposit LDP does not include all of the Tata owned land put forward at the Candidate Site stages within this regeneration allocation. A copy
2.3 We note from the Council’s response to the Candidate Site Assessment (Candidate Sites Report, February 2012) that it considers that the operational steelworks site to the north of Queensway is not proposed for any change of use over the plan period. We also note that this area is located within the defined urban boundary in the Revised Deposit LDP and that the operational land is not affected by any landscape designations or allocations or policies of restraint. We do not therefore raise any issues with this treatment of the operational land to the north of Queensway and trust that any future development opportunities associated with the ongoing steelworks operations (or those that are ancillary to such uses) will be dealt with positively in line with the relevant employment related policies within the LDP.

2.4 However, there is a significant additional area of land (promoted as part of the Candidate Site process), located to the both the west and east of the proposed allocation EM2(ii) which appears to have been excluded from the urban boundary development limits defined by the Revised Deposit LDP. This area of land is, however, included within the development limits identified by the current adopted UDP. The exclusion from the urban development limits of an area of land that continues to form part of our client’s operations is unacceptable and we object to the Revised Deposit LDP on this basis.

2.5 In light of this, the part of our client’s operational land area (both to the east and west of allocation EM2(ii)) is identified as being outside the defined urban boundary in the Revised Deposit Plan and is also subject to the following designations:

- Undeveloped Coastal Zone; and
- Special Landscape Area.

2.6 We consider that such a situation ignores the historic context to this part of our client’s land and operations, as well as its current physical condition and use. The treatment of our client’s land in this manner also appears to ignore the potential future changes that the route of the safeguarded M4 relief road could bring to this part of Newport.

2.7 The Tata owned land that has been excluded from the defined development limits comprises the reed bed system that forms an integral and important part of the operational steelworks site to the north of Queensway. Simply put, the steelworks is reliant on the continued use of this system to discharge, and treat, all surface water and foul sewage produced by the works. The reed bed area at Greenmore, to the south of Queensway, is therefore part of the industrial operations that take place at the site, and should be included within the urban boundary (and subsequently excluded from the Undeveloped Coastal Zone and SLA) accordingly. To identify this area as being outside of the urban boundary (and consequently within a SLA and Undeveloped Coast) is clearly at odds with the important role that this area plays in the functioning of the steelworks. This role is expected to continue over the lifetime of the LDP and needs to be fully recognised in the LDP.

2.8 There is also a risk that under the current policy / allocations identified in the Revised Deposit Plan that any works of repair or maintenance to the reed bed system could be in conflict with the policies of restraint associated with the proposed Undeveloped Coastal Zone and SLA designations. We trust that this is not the intention of the Revised Deposit Plan and therefore seek amendments to the plan to rectify this situation.

2.9 As stated earlier, the treatment of Tata’s land in this area in the Revised Deposit LDP is also not consistent with the position established in the current adopted UDP. The adopted UDP allocates the majority of the land to the south of Queensway as a waste allocation associated with the Steelworks, under Policy WD2. This area is all contained with the urban development limits of the UDP. A copy of the UDP Proposals map indicating the extent of the urban boundary is included at Appendix X for clarity.

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2.11 With regards to the M4 relief road, it is noted that the Revised Deposit LDP Constraints Plan for East Newport identifies land safeguarded for this to the south of Tata’s landholdings. It is suggested that this safeguarded route should be utilised as the boundary between the urban area (to the north of the safeguarded land) and the undeveloped open coast and Special Landscape Area (to the south of the relief road). At present, the Revised Deposit Proposals Map paints a confused picture by safeguarding land for the M4 relief road that is outside the urban area – land that is also within the SLA and undeveloped coastal zone in the latest iteration of the plan.

2.12 In light of this, we contend that the LDP urban boundary should be amended in line with our suggested approach above. We therefore request that the urban boundary limits are redrawn to reflect this (and mirror the position established by the adopted UDP). There appears to be no justification for the realignment of these urban limits established in the Revised Deposit LDP and the introduction of the SLA and Undeveloped Coastal Zone designations.

2.13 In summary, we consider that the following amendments are required to the Deposit Plan in order to rectify this situation:

- Redrawing of the urban boundary limits to the east and west of allocation EM2(ii) to reflect the urban boundary limits of the adopted UDP – this will ensure that the reed bed systems to the south of Queensway are included within the urban boundary limits; and
- Associated removal of Undeveloped Coastal Zone and SLA designations to the land which is to be included within the realigned urban boundary.

2.14 Such an approach would overcome our objections and provide the correct correlation between areas of landscape quality to be protected and the operational and intrinsic parts of the steelworks site. At present, the Revised Deposit Proposals Map fails to do this as it does not take account of the differences between the open areas to the south of the Tata land (south of proposed M4 relief road) and the operational / industrialised areas to the north of the proposed M4 relief road.

2.15 We therefore consider that the Proposals Map – East requires amendment – principally for the purposes of clarity – to ensure that Tata’s land (as promoted at Candidate Site stage) is included within the urban boundary and not the countryside (defined by Policy SP5) and excluded from the Undeveloped Coastal Zone (Policy CE10), and the Caldicot Levels Special Landscape Area.
3. Policy EM1(ii) – Employment Land Allocations

3.1 We note that part of the Tata Landholding at Llanwern is no longer included within the employment allocation identified under Policy EM1 (ii). This position in the Revised Deposit LDP differs significantly from the position in the previous Deposit Version of the LDP, and indeed the adopted UDP.

3.2 The Deposit Version of the LDP identified this employment land allocation known as ‘East of Queensway Meadows, South of Glan Llyn’ for a total of 142 hectares of land, of which the Tata land comprises the south eastern part. The plan in Appendix 3 indicates the extent of the Tata owned land that formed part of this allocation in the Deposit Plan.

3.3 However, it now appears that this land has been omitted from the employment allocation EM1(ii) in the latest Revised Deposit Plan, with the allocation only now comprising some 34 hectares of land, as opposed to the previous 142 hectares.

3.4 It appears that this omission of the Tata land from allocation EM1 (ii) is a response to representations that were made to the Deposit Version of the LDP by interested parties, seeking the deletion of allocation EM1 (ii) from the LDP, as well as those seeking a major amendment to the site boundary (effectively reducing the employment potential of this area). The proposed deletion of the site was advertised as Alternative Site Reference AS(D)009 and the amendment as AS(A)029. We objected to these Alternative Site representations on the grounds that the exclusion of the site would make the LDP unsound and that the Deposit LDP is entirely sound with this allocation in place. Accordingly, we requested that the Alternative Sites AS(D)009 and AS(A)029 not be taken forward and that the land in question remain allocated in the plan going forward. However, it appears that the allocation has been substantially amended despite our representations to the contrary.

3.5 The representations that sought the deletion and/or major amendment of this allocation related to concerns of nature conservation and impact on the SSSI. As previously detailed, these concerns are understood. However, it is considered that the inclusion of the Tata land within allocation EM1(ii) can take full account of such constraints and issues in any event. The wording of Policy EM1(ii) in the Deposit version of the plan made it clear that proposals for this area would have to demonstrate that the national economic benefits of the proposals outweigh the environmental impacts, including visual intrusion and loss and damage to habitats and/or species, especially within the Nash and Goldcliff SSSIs. The supporting text contained within the Deposit version of the Plan also made it clear that developers will be required to demonstrate the national economic benefits of their proposal, as well as ensuring compliance with Environmental Impact Assessment Regulations and any requirements for a Habitat Regulation Assessment of these works as part of the planning process.

3.6 In light of this situation, it is considered that the issues associated with the site’s development can be fully accounted for in a revised policy context as per that set out in the Deposit version of the Plan. The diminished size of this employment allocation in the Revised Deposit Plan could potentially stifle the opportunity for Newport to secure large scale employment generating development over the period of the LDP which will be of a prestigious nature for the City. The importance of such potential should not be unduly lost by the downgrading and downsizing of this allocation ass is the case in the Revised Deposit Plan. The policy context set out in the Deposit Plan made it clear that full consideration will need to be given to nature conservation issues and impact on the sensitive area in which it is sited. This policy context also makes it clear that any future proposals for the site will need to meet strict and stringent tests of compliance and be of significant benefit to the city. It is therefore considered that this policy context should be reintroduced and for the allocation to be enlarged back to the 142 hectares identified within the Deposit Plan. This would include the Tata owned land that has been excluded from the Revised Deposit Plan.

3.7 It is also important to note that this area of land that is now excluded from allocation EM1(ii) lies alongside the safeguarded route for the proposed M4 relief road. This area could, over the life of the LDP, experience significant change and transformation and be well placed to deliver employment development of national significance as new opportunities emerge. It is therefore considered important to safeguard such an opportunity, which cannot be delivered elsewhere (within such proximity to the M4) so that this strategic opportunity is not lost. Any development of the site would clearly need to take full account of special qualities of this area, as required by the plan in its current format. The employment allocation in the LDP should therefore revert back to the position established in the previous Deposit version of the Plan in order to secure the objectives and visions for the city as a whole.

4. Policy EM2(ii) – Regeneration Sites

4.1 As set out above, we welcome the partial allocation of the Tata land under allocation EM2 (ii) in the Revised Deposit Plan. This allocation identifies 122 hectares of land at the Llanwern former tipping area south of Queensway for B1, B2 and B8 uses. Such an approach is broadly consistent with the representations that have been made to the LDP process to date by Tata (copies included at Appendix 1). This allocation clearly recognises the significant opportunity presented by this gateway site and the significant changes that will be delivered to this part of Eastern Newport over the plan period.

4.2 Whilst we welcome such recognition under allocation EM2 (ii), we do not consider that this policy context is broad enough to fully take account of the development opportunity presented by the Tata site and landholdings.

4.3 As detailed at both the Candidate and Major Candidate site submission stages, as well as the Deposit stage consultation, this area of Newport is due to undergo significant changes over the lifetime of the LDP, which can be summarised as follows:

- To the west, St Modwen has secured planning permission for a major new community on the site of the former heavy end* of the steelworks. A total of 4,000 new homes is proposed in a transformed landscape, together with a new local centre, and a new business park;
- The proposals will also significantly alter the accessibility of the area. The Queensway will become a public highway (as identified in the Revised Deposit Plan) and will connect the southern...
4.4 In this light, it is felt that the urban regeneration allocation for this site would benefit from widening of the range of land uses that may be considered acceptable at the site, beyond those of the prescribed B1, B2 and B8 uses. It is felt that limiting the development of this site to these uses only could potentially unduly constrain development activity and not be flexible enough to accommodate other important and deliverable land uses over the plan period – uses that would both complement and enhance the wider regeneration initiatives within this part of Newport.

4.5 As set out in greater detail in our previous representations to the emerging plan (Appendix 1), we would therefore request that this policy be widened to include reference to the following uses (which formed part of our previous representations):
- Residential;
- Hotel and Roadside Uses;
- Energy and waste to energy facilities.

4.6 Such an approach would be consistent with the overall sustainability aims of the Revised Deposit LDP by ensuring that truly mixed use communities can be delivered at sustainable transport locations that are capable of delivering large scale redevelopment.

4.7 We would therefore suggest that the supporting text which accompanies Policy EM2 (ii) at paragraph 6.17 of the Revised Deposit Plan be amended to read as follows:

Llanwern Former Tipping Area South of Queensway
This area of land south of Queensway will provide a mixed use development opportunity that will capitalise on the changing nature of this part of the East Newport. The site will be suitable to accommodate a range of land uses including B1, B2, B8 and more specialist energy and waste related uses. The opening up of the Queensway and the potential M4 relief road could potentially facilitate other complementary uses such as roadside activities (hotels etc). Ancillary residential development may also be considered as part of a mix of land uses, subject to compliance with all relevant policies of the LDP.

4.8 We trust that this allocation will be amended to include reference to these additional uses and the LDP amended accordingly.

12 Speaking at Public Examination

Wish to discuss the context to the site and the reasons for seeking the amendments to the allocation to the south of Llanwern Steelworks, and associated realignment of settlement boundary limits, employment allocations and other land allocations within this area. The issues and plan delineation for this are complex and best considered to be dealt with in person in order to fully explain the situation on the ground and the amendments sought.

Item Question | Council Responses
--- | ---
2 2 Soundness of LDP | No

13 Council Response

Proposals for waste management facilities, including disposal and treatment plant, are considered acceptable in principle within sites listed for B2 employment use. This is confirmed in the Welsh Government’s Policy Clarification Note on Waste Policies dated 28th May 2004. Therefore it is considered that no change needs to be made to the policy wording or allocations plan in order to accommodate a waste or energy from waste facility.

The Council would be resistant to amending the policy and allocations plan to accommodate residential development. Sufficient residential development has already been allocated at the nearby Glan Llyn site which is expected to deliver housing throughout the plan period and beyond. It is considered that no additional housing would be required in this area.

Any planning application for a hotel which would complement development in the area could be considered as a departure to the LDP.
### Representation Details

**Document:** Revised LDP, p.21  
**Policy:** SP05  
**Summary:** Amendment of countryside area following proposed urban boundary change

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Additional material submitted

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**Corus UK Ltd / Tata Steel UK Ltd**  
**Agent:** GVA Grimley  
**Accession No:** 1420.L4//SP05  
**Date Lodged:** 07/08/2013  
**Late?:** E  
**Source:** O  
**Type:** I  
**Mode:** M  
**Status:** M

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**Newport City Council Local Development Plan**
1. Introduction and Context

1.1 This statement has been prepared by GVA on behalf of Tata UK Steel Ltd (Tata) in response to the published Revised Deposit Newport Local Development (LDP). This statement accompanies the relevant completed Revised Deposit Plan Response Form(s) and should be read in conjunction with all previous representations made to the LDP process on behalf of Tata. Copies of these submissions are attached at Appendix 11 for clarity and ease of reference.

1.2 To a large extent, this statement reiterates the representations made to the Deposit Version of the Plan back in July 2012. However, given that we understand that these previous representations will not necessarily be considered by the Inspector as part of the LDP examination, we write again herein in response to this latest Revised Deposit Version of the Plan.

1.3 In general terms, we welcome the ‘partial’ recognition of the development opportunity that is presented by the Tata owned land at Llanwern, under the urban regeneration allocation EM2(ii), as well as the identification of the major road scheme (Policy SP16(i)) at Queensway which will serve Glan Llyn and also provide a new strategic east-west link, providing relief for the M4.

1.4 The Council will be well aware of the significant opportunity that the Tata landholdings at Llanwern present following the representations made to all previous stages of the LDP process. In short, our previous representations, particularly at the Major Candidate Site, Candidate Site and Deposit Plan stages, have sought to secure recognition of the Tata owned land at Llanwern as a gateway to Newport and south east Wales for new, improved and replacement facilities associated with New Llanwern to the north of Queensway. Additionally, our representations have sought to illustrate the opportunity for the Tata owned land to the south of Queensway, to accommodate a full mix of uses and activities over the lifetime of the LDP to reflect the changing nature of this key gateway location.

2. Proposals Map - East

2.1 As detailed in the introduction above, we welcome the allocation of part of the Tata owned land at Llanwern under Policy EM2(ii), as identified on the Proposals Map - East. This positive allocation clearly recognises the development potential of Tata’s land and how it can positively contribute to the regeneration of this strategically important gateway location. This allocation, described in the Revised Deposit Plan as ‘Llanwern Former Tipping Area South of Queensway’, essentially identifies 122 hectares of land to provide for B1, B2 and B8 uses.

2.2 Notwithstanding this, it is evident that the Revised Deposit LDP does not include all of the Tata owned land put forward at the Candidate Site stages within this regeneration allocation. A copy...
of the redline site plan submitted at the Candidate Site stage is included at Appendix 1 (Newport LDP Major Candidate Sites Submission) and identifies the full extent of Tata’s land at this location.

2.3 We note from the Council’s response to the Candidate Site Assessment (Candidate Sites Report, February 2012) that it considers that the operational steelworks site to the north of Queensway is not proposed for any change of use over the plan period. We also note that this area is located within the defined urban boundary in the Revised Deposit LDP and that the operational land is not affected by any landscape designations or allocations or policies of restraint. We do not therefore raise any issues with this treatment of the operational land to the north of Queensway and trust that any future development opportunities associated with the ongoing steelworks operations (or those that are ancillary to such uses) will be dealt with positively in line with the relevant employment related policies within the LDP.

2.4 However, there is a significant area of Tata’s land to the south of Queensway that has been excluded from the regeneration allocation under Policy EM2 (ii). Furthermore, there is a significant additional area of land (promoted as part of the Candidate Site process), located to the both the west and east of the proposed allocation EM2 (ii) which appears to have been excluded from the urban boundary development limits defined by the Revised Deposit LDP. This area of land is, however, included within the development limits identified by the current adopted UDP. The exclusion from the urban development limits of an area of land that continues to form part of our client’s operations is unacceptable and we object to the Revised Deposit LDP on this basis.

2.5 In light of this, the part of our client’s operational land area (both to the east and west of allocation EM2(ii)) is identified as being outside the defined urban boundary in the Revised Deposit Plan and is also subject to the following designations:

- Undeveloped Coastal Zone;
- Special Landscape Area.

2.6 We consider that such a situation ignores the historic context to this part of our client’s land and operations, as well as its current physical condition and use. The treatment of our client’s land in this manner also appears to ignore the potential future changes that the route of the safeguarded M4 relief road could bring to this part of Newport.

2.7 The Tata owned land that has been excluded from the defined development limits comprises the reed bed system that forms an integral and important part of the operational steelworks site to the north of Queensway. Simply put, the steelworks is reliant on the continued use of this system to discharge, and treat, all surface water and foul sewage produced by the works. The reed bed area at Greenmore, to the south of Queensway, is therefore part of the industrial operations that take place at the site, and should be included within the urban boundary (and subsequently excluded from the Undeveloped Coastal Zone and SLA) accordingly. To identify this area as being outside of the urban boundary (and consequently within a SLA and the Undeveloped Coast) is clearly at odds with the important role that this area plays in the functioning of the steelworks. This role is expected to continue over the lifetime of the LDP and needs to be fully recognised in the LDP.

2.8 There is also a risk that under the current policy / allocations identified in the Revised Deposit Plan that any works of repair or maintenance to the reed bed system could be in conflict with the policies of restraint associated with the proposed Undeveloped Coastal Zone and SLA designations. We trust that this is not the intention of the Revised Deposit Plan and therefore seek amendments to the plan to rectify this situation.

2.9 As stated earlier, the treatment of Tata’s land in this area in the Revised Deposit LDP is also not consistent with the position established in the current adopted UDP. The adopted UDP allocates the majority of the land to the south of Queensway as an waste allocation associated with the Steelworks, under Policy WD2. This area is all contained within the urban development limits of the UDP. A copy of the UDP Proposals map indicating the extent of the urban boundary is included at Appendix 2 for clarity.

2.10 The basis of the reed bed system is that the reed bed area within the SLA is unclear. As set out in our previous representations to the LDP process, the southern boundary of the Tata land (to the south of Queensway) is bordered by large electricity pylons that run in a predominantly east to west direction. Such an alignment would be consistent with the operational characteristics of the area and the situation in the adopted UDP. Importantly, it would also have regard to the safeguarded route of the M4 relief road which continues to be identified (and safeguarded) in the Revised Deposit Plan.

2.11 With regards to the M4 relief road, it is noted that the Revised Deposit LDP Constraints Plan for East Newport identifies land safeguarded for this to the south of Tata’s landholdings. It is suggested that this safeguarded route should be utilised as the boundary between the urban area (to the north of the safeguarded land) and the undeveloped open coast and Special Landscape Area (to the south of the relief road). At present, the Revised Deposit LDP Proposals Map paints a confused picture by safeguarding land for the M4 relief road that is outside the urban area – land that is also within the SLA and undeveloped coastal zone in the latest iteration of the plan.

2.12 In light of this, we contend that the LDP urban boundary should be amended in line with our suggested approach above. We therefore request that the urban boundary limits are redrawn to reflect this (and mirror the position established by the adopted UDP). There appears to be no justification for the realignment of these urban limits established in the Revised Deposit LDP and the introduction of the SLA and Undeveloped Coastal Zone designations.

2.13 In summary, we consider that the following amendments are required to the Deposit Plan in order to rectify this situation:

- Redrawing of the urban boundary limits to the east and west of allocation EM2(ii) to reflect the urban boundary limits of the adopted UDP – this will ensure that the reed bed systems to the south of Queensway are included within the urban boundary limits; and
- Associated removal of Undeveloped Coastal Zone and SLA designations to the land which is to be included within the realigned urban boundary.

2.14 Such an approach would overcome our objections and provide the correct correlation between areas of landscape quality to be protected and the operational and intrinsic parts of the steelworks site. At present, the Revised Deposit Proposals Map fails to do this as it does not take account of the differences between the open areas to the south of the Tata land (south of proposed M4 relief road) and the operational / industrialised areas to the north of the proposed M4 relief road.

2.15 We therefore consider that the Proposals Map – East requires amendment – principally for the purposes of clarity – to ensure that Tata’s land (as promoted at Candidate Site stage) is included within the urban boundary and not the countryside (defined by Policy SP5) and excluded from the Undeveloped Coastal Zone (Policy CE10), and the Caldicot Levels Special Landscape Area
3. **Policy EM1(ii) – Employment Land Allocations**

3.1 We note that part of the Tata Landholding at Llanwern is no longer included within the employment allocation identified under Policy EM1(ii). This position in the Revised Deposit LDP differs significantly from the position in the previous Deposit Version of the LDP, and indeed the adopted UDP.

3.2 The Deposit Version of the LDP identified this employment land allocation known as ‘East of Queensway Meadows, South of Glan Llyn’ for a total of 142 hectares of land, of which the Tata land comprises the south eastern part. The plan in Appendix 3 indicates the extent of the Tata owned land that formed part of this allocation in the Deposit Plan.

3.3 However, it now appears that this land has been omitted from the employment allocation EM1(ii) in the latest Revised Deposit Plan, with the allocation only now comprising some 34 hectares of land, as opposed to the previous 142 hectares.

3.4 It appears that this omission of the Tata land from allocation EM1(ii) is a response to representations that were made to the Deposit Version of the LDP by interested parties, seeking the deletion of allocation EM1(ii) from the LDP, as well as a those seeking a major amendment to the site boundary (effectively reducing the employment potential of this area). The proposed deletion of the site was advertised as Alternative Site Reference AS(D)009 and the amendment as AS(A)029. We objected to these Alternative Site representations on the grounds that the exclusion of the site would make the LDP unsound and that the Deposit LDP is entirely sound with this allocation in place. Accordingly, we requested that the Alternative Sites AS(D)009 and AS(A)029 not be taken forward and that the land in question remained allocated in the plan going forward. However, it appears that the allocation has been substantially amended despite our representations to the contrary.

3.5 The representations that sought the deletion and/or major amendment of this allocation related to concerns of nature conservation and impact on the SSSI. As previously detailed, these concerns are understood. It is considered that the inclusion of the Tata land within allocation EM1(ii) can take full account of such constraints and issues in any event. The wording of Policy EM1(iii) in the Deposit version of the plan made it clear that that proposals for this area would have to demonstrate that the national economic benefits of the proposals outweigh the environmental impacts, including visual intrusion and loss and damage to habitats and/or species, especially within the Nash and Goldcliff SSSIs. The supporting text contained within the Deposit version of the Plan also made it clear that developers will be required to demonstrate the national economic benefits of their proposal, as well as ensuring compliance with Environmental Impact Assessment Regulations and any requirements for a Habitat Regulation Assessment of these works as part of the planning process.

3.6 In light of this situation, it is considered that the issues associated with the site’s development can be fully accounted for in a revised policy context as per that set out in the Deposit version of the Plan. The diminished size of this employment allocation in the Revised Deposit Plan could potentially stifle the opportunity for Newport to secure large scale employment generating development over the period of the LDP which will be of a prestigious nature for the City. The importance of such potential should not be unduly lost by the downgrading and downsizing of this allocation ass is the case in the Revised Deposit Plan. The policy context set out in the Deposit Plan made it clear that full consideration will need to be given to nature conservation issues and impact on the sensitive area in which it is sited. This policy context also makes it clear that any future proposals for the site will need to meet strict and stringent tests of compliance and be of significant benefit to the city. It is therefore considered that this policy context should be reintroduced and for the allocation to be enlarged back to the 142 hectares identified within the Deposit Plan. This would include the Tata owned land that has been excluded from the Revised Deposit Plan.

3.7 It is also important to note that this area of land that is now excluded from allocation EM1(ii) lies alongside the safeguarded route for the proposed M4 relief road. This area could, over the life of the LDP, experience significant change and transformation and be well placed to deliver employment development of national significance as new opportunities emerge. It is therefore considered important to safeguard such an opportunity, which cannot be delivered elsewhere (within such proximity to the M4) so that this strategic opportunity is not lost. Any development of the site would clearly need to take full account of special qualities of this area, as required by the plan in its current format. The employment allocation in the LDP should therefore revert back to the position established in the previous Deposit version of the Plan in order to secure the objectives and visions for the city as a whole.

4. **Policy EM2(ii) – Regeneration Sites**

4.1 As set out above, we welcome the partial allocation of the Tata land under allocation EM2(ii) in the Revised Deposit Plan. This allocation identifies 122 hectares of land at the Llanwern former tipping area south of Queensway for B1, B2 and B8 uses. Such an approach is broadly consistent with the representations that have been made to the LDP process to date by Tata (copies included at Appendix 1). This allocation clearly recognises the significant opportunity presented by this gateway site and the significant changes that will be delivered to this part of Eastern Newport over the plan period.

4.2 Whilst we welcome such recognition under allocation EM2(ii), we do not consider that this policy context is broad enough to fully take account of the development opportunity presented by the Tata site and landholdings.

4.3 As detailed at both the Candidate and (Major Candidate) site submission stages, as well as the Deposit stage consultation, this area of Newport is due to undergo significant changes over the lifetime of the LDP, which can be summarised as follows:

- □ To the west, St Modwen has secured planning permission for a major new community on the site of the former heavy end of the steelworks. A total of 4,000 new homes is proposed in a transformed landscape, together with a new local centre, and a new business park;
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4.5 As set out in greater detail in our previous representations to the emerging plan (Appendix 1), we would therefore request that this policy be widened to include reference to the following uses (which formed part of our previous representations):

- Residential;
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4.7 We would therefore suggest that the supporting text which accompanies Policy EM2 (ii) at paragraph 6.17 of the Revised Deposit Plan be amended to read as follows:

Llanwern Former Tipping Area South of Queensway

This area of land south of Queensway will provide a mixed use development opportunity that will capitalise on the changing nature of this part of the East Newport. The site will be suitable to accommodate a range of land uses including B1, B2, B8 and more specialist energy and waste related uses. The opening up of the Queensway and the potential M4 relief road could potentially facilitate other complementary uses such as roadside activities (hotels etc). Ancillary residential development may also be considered as part of a mix of land uses, subject to compliance with all relevant policies of the LDP.

4.8 We trust that this allocation will be amended to include reference to these additional uses and the LDP amended accordingly.

12 Speaking at Public Examination

Wish to discuss the context to the site and the reasons for seeking the amendments to the allocation to the south of Llanwern Steelworks, and associated realignment of settlement boundary limits, employment allocations and other land allocations within this area. The issues and plan delineation for this are complex and best considered to be dealt with in person in order to fully explain the situation on the ground and the amendments sought.

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Item Question | Council Responses
---|---
Soundness of LDP | Yes

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No change. The area of land which has been allocated as countryside is designated as a Site of Special Scientific Interest. Whilst it is noted that the reed bed system forms part of the operational steelworks site (as this is an existing situation) this is not prejudiced by the new allocation. However the allocation as countryside will serve to ensure control over future development.

The deposit LDP stated an oversupply of employment land allocation. Further work has been undertaken to review this oversupply in line with representations received and an Employment Land Review has been undertaken. This review has evidenced a reduction in a number of employment sites and supplies justification as to the continued oversupply within the plan. Therefore it is not considered necessary that this site is allocated for employment uses.
### Representation Details

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**Additional material submitted**

Document: Revised LDP, p.22

Policy: SP08

Summary: Amendment to SLA boundary following proposed urban boundary change

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1.3 In general terms, we welcome the ‘partial’ recognition of the development opportunity that is presented by the Tata owned land at Llanwern, under the urban regeneration allocation EM2(ii), as well as the identification of the major road scheme (Policy SP16ii) at Queensway which will serve Glan Llyn and also provide a new strategic east-west link, providing relief for the M4.

1.4 The Council will be well aware of the significant opportunity that the Tata landholdings at Llanwern present following the representations made to all previous stages of the LDP process. In short, our previous representations, particularly at the Major Candidate Site, Candidate Site and Deposit Plan stages, have sought to secure recognition of the Tata owned land at Llanwern as a gateway to Newport and south east Wales for new, improved and replacement facilities associated with New Llanwern to the north of Queensway. Additionally, our representations have sought to illustrate the opportunity for the Tata owned land to the south of Queensway, to accommodate a full mix of uses and activities over the lifetime of the LDP to reflect the changing nature of this key gateway location.

1.5 It is in the context of these previous representations and submissions that we respond to the latest expression of Policy in the Revised Deposit Plan.

1.6 As set out above, whilst we welcome the partial allocation of the Tata landholdings within the Revised Deposit Plan under Policy EM2(ii), our representations herein are mainly related to the fact that this allocation:

   a) does not recognise the full development potential, and extent, of the Tata landholdings and the contribution this land could make to the aims and objectives of the LDP; and
   
   b) does not include sufficient flexibility to allow a range of mixed use opportunities to be delivered over the LDP period, thus contributing to the future economic growth of the City.

1.7 Importantly, in conjunction with these two main objections, we also object to the Revised Deposit LDP Proposals Map which appears to include landscape designations that affect Tata’s landholdings at Llanwern, whilst excluding parts of their landholdings the land from the urban boundary and thus limiting the extent of the regeneration allocation under Policy EM2(ii) and employment allocation EM1(ii). Such landscape designations include the new Special Landscape Area (Caldicot Levels) identified under Policy SP8, as well as the Undeveloped Coastal Zone designation under Policy CE10. These landscape designations, and the omission of the land from the urban boundary (and the regeneration allocation), do not appear to correlate with the physical condition or use of our client’s land, nor indeed with the situation identified in the current adopted Newport Unitary Development Plan (UDP), or indeed the previous Deposit Version of the LDP. We therefore seek amendments to the East Newport Area Proposals Map of the Revised Deposit Plan.

1.8 It is our view that without the changes sought in these representations, the Revised Deposit LDP fails the following Tests of Soundness:

   a) **CE1** – as the plan will not comprise a coherent strategy from which its policies and allocations can logically flow;
   
   b) **CE2** – as the policies, and in particular allocations, are not realistic and do not fully consider the relevant alternatives and all credible evidence; and
   
   c) **CE4** – in that the plan will not be flexible enough to deal with changing circumstances over the plan period – particularly in respect of the Tata land at Llanwern which will be at the centre of transformation associated with the East Newport Expansion.

1.9 We set out below our detailed representations, together with the alterations and amendments required to make the LDP sound. We begin by examining the East Newport Proposals Map (and associated designations, allocations and urban development limits) that affect the Tata landholdings at Llanwern, before moving on to examine the written policies of relevance in respect of the urban regeneration allocation EM2(ii) and employment allocation EM1(ii).

2. **Proposals Map - East**

2.1 As detailed in the introduction above, we welcome the allocation of part of the Tata owned land at Llanwern under Policy EM2 (ii), as identified on the Proposals Map - East. This positive allocation clearly recognises the development potential of Tata’s land and how it can positively contribute to the regeneration of this strategically important gateway location. This allocation, described in the Revised Deposit Plan as ‘Llanwern Former Tipping Area South of Queensway’, essentially identifies 122 hectares of land to provide for B1, B2 and B8 uses.

2.2 Notwithstanding this, it is evident that the Revised Deposit LDP does not include all of the Tata owned land put forward at the Candidate Site stages within this regeneration allocation. A copy...
We note from the Council's response to the Candidate Site Assessment (Candidate Sites Report, February 2012) that it considers that the operational steelworks site to the north of Queensway is not proposed for any change of use over the plan period. We also note that this area is located within the defined urban boundary in the Revised Deposit LDP and that the operational land is not affected by any landscape designations or allocations or policies of restraint. We do not therefore raise any issues with this treatment of the operational land to the north of Queensway and trust that any future development opportunities associated with the ongoing steelworks operations (or those that are ancillary to such uses) will be dealt with positively in line with the relevant employment related policies within the LDP.

However, there is a significant area of Tata's land to the south of Queensway that has been excluded from the regeneration allocation under Policy EM2 (ii). Furthermore, there is a significant additional area of land (promoted as part of the Candidate Site process), located to the both the west and east of the proposed allocation EM2 (ii) which appears to have been excluded from the urban boundary development limits defined by the Revised Deposit LDP. This area of land is, however, included within the development limits identified by the current adopted UDP. The exclusion from the urban development limits of an area of land that continues to form part of our client's operations is unacceptable and we object to the Revised Deposit LDP on this basis.

In light of this, the part of our client's operational land area (both to the east and west of allocation EM2(ii)) is identified as being outside the defined urban boundary in the Revised Deposit Plan and is also subject to the following designations:
- Undeveloped Coastal Zone; and
- Special Landscape Area.

We consider that such a situation ignores the historic context to this part of our client's land and operations, as well as its current physical condition and use. The treatment of our client's land in this manner also appears to ignore the potential future changes that the route of the safeguarded M4 relief road could bring to this part of Newport.

The Tata owned land that has been excluded from the defined development limits comprises the reed bed system that forms an integral and important part of the operational steelworks site to the north of Queensway. Simply put, the steelworks is reliant on the continued use of this system to discharge, and treat, all surface water and foul sewage produced by the works. The reed bed area at Greenmore, to the south of Queensway, is therefore part of the industrial operations that take place at the site, and should be included within the urban boundary (and subsequently excluded from the Undeveloped Coastal Zone and SLA) accordingly. To identify this area as being outside of the urban boundary (and consequently within a SLA and Undeveloped Coast) is clearly at odds with the important role that this area plays in the functioning of the steelworks. This role is expected to continue over the lifetime of the LDP and needs to be fully recognised in the LDP.

There is also a risk that under the current policy / allocations identified in the Revised Deposit Plan that any works of repair or maintenance to the reed bed system could be in conflict with the policies of restraint associated with the proposed Undeveloped Coastal Zone and SLA designations. We trust that this is not the intention of the Revised Deposit Plan and therefore seek amendments to the plan to rectify this situation.

As stated earlier, the treatment of Tata's land in this area in the Revised Deposit LDP is also not consistent with the position established in the current adopted UDP. The adopted UDP allocates the majority of the land to the south of Queensway as a waste allocation associated with the Steelworks, under Policy WD2. This area is all contained with the urban development limits of the UDP. A copy of the UDP Proposals map indicating the extent of the urban boundary is included at Appendix 2 for clarity.

The basis for the inclusion of the reed bed area within the SLA is unclear. As set out in our previous representations to the LDP process, the southern boundary of the Tata land (to the south of Queensway) is bordered by large electricity pylons that run in a predominantly east to west direction. It would be appropriate therefore to utilise the line of these pylons as the boundary between the developed / urban area to the north and the SLA to the south. Such an alignment would be consistent with the operational characteristics of the area and the situation in the adopted UDP. Importantly, it would also have regard to the safeguarded route of the M4 relief road which continues to be identified (and safeguarded) in the Revised Deposit Plan.

With regards to the M4 relief road, it is noted that the Revised Deposit LDP Constraints Plan for East Newport identifies land safeguarded for this to the south of Tata's landholdings. It is suggested that this safeguarded route should be utilised as the boundary between the urban area (to the north of the safeguarded land) and the undeveloped open coast and Special Landscape Area (to the south of the relief road). At present, the Revised Deposit LDP Proposals Map paints a confused picture by safeguarding land for the M4 relief road that is outside the urban area – land that is also within the SLA and undeveloped coastal zone in the latest iteration of the plan.

In light of this, we contend that the LDP urban boundary should be amended in line with our suggested approach above. We therefore request that the urban boundary limits are redrawn to reflect this (and mirror the position established by the adopted UDP). There appears to be no justification for the realignment of these urban limits established in the Revised Deposit LDP and the introduction of the SLA and Undeveloped Coastal Zone designations.

In summary, we consider that the following amendments are required to the Deposit Plan in order to rectify this situation:
- Redrawing of the urban boundary limits to the east and west of allocation EM2(ii) to reflect the urban boundary limits of the adopted UDP – this will ensure that the reed bed systems to the south of Queensway are included within the urban boundary limits; and
- Associated removal of Undeveloped Coastal Zone and SLA designations to the land which is to be included within the realigned urban boundary.

Such an approach would overcome our objections and provide the correct correlation between areas of landscape quality to be protected and the operational and intrinsic parts of the steelworks site. At present, the Revised Deposit Proposals Map fails to do this as it does not take account of the differences between the open areas to the south of the Tata land (south of proposed M4 relief road) and the operational / industrialised areas to the north of the proposed M4 relief road.

We therefore consider that the Proposals Map – East requires amendment – principally for the purposes of clarity – to ensure that Tata's land (as promoted at Candidate Site stage) is included within the urban boundary and not the countryside (defined by Policy SP5) and excluded from the Undeveloped Coastal Zone (Policy CE10), and the Caldicot Levels Special Landscape Area.
3. Policy EM1(ii) – Employment Land Allocations

3.1 We note that part of the Tata Landholding at Llanwern is no longer included within the employment allocation identified under Policy EM1(ii). This position in the Revised Deposit LDP differs significantly from the position in the previous Deposit Version of the LDP, and indeed the adopted UDP.

3.2 The Deposit Version of the LDP identified this employment land allocation known as ‘East of Queensway Meadows, South of Glan Llyn’ for a total of 142 hectares of land, of which the Tata land comprises the south eastern part. The plan in Appendix 3 indicates the extent of the Tata owned land that formed part of this allocation in the Deposit Plan.

3.3 However, it now appears that this land has been omitted from the employment allocation EM1(ii) in the latest Revised Deposit Plan, with the allocation only now comprising some 34 hectares of land, as opposed to the previous 142 hectares.

3.4 It appears that this omission of the Tata land from allocation EM1(ii) is a response to representations that were made to the Deposit Version of the LDP by interested parties, seeking the deletion of allocation EM1(ii) from the LDP, as well as those seeking a major amendment to the site boundary (effectively reducing the employment potential of this area). The proposed deletion of the site was advertised as Alternative Site Reference AS(D)009 and the amendment as AS(A)029. We objected to these Alternative Site representations on the grounds that the exclusion of the site would make the LDP unsound and that the Deposit LDP is entirely sound with this allocation in place. Accordingly, we requested that the Alternative Sites AS(D)009 and AS(A)029 not be taken forward and that the land in question remained allocated in the plan going forward. However, it appears that the allocation has been substantially amended despite our representations to the contrary.

3.5 The representations that sought the deletion and/or major amendment of this allocation related to concerns of nature conservation and impact on the SSSI. As previously detailed, these concerns are understood. However, it is considered that the inclusion of the Tata land within allocation EM1(ii) can take full account of such constraints and issues in any event. The wording of Policy EM1(ii) in the Deposit version of the plan made it clear that proposals for this area would have to demonstrate that the national economic benefits of the proposals outweigh the environmental impacts, including visual intrusion and loss and damage to habitats and/or species, especially within the Nash and Goldcliff SSSIs. The supporting text contained within the Deposit version of the Plan also made it clear that developers will be required to demonstrate the national economic benefits of their proposal, as well as ensuring compliance with Environmental Impact Assessment Regulations and any requirements for a Habitat Regulation Assessment of these works as part of the planning process.

3.6 In light of this situation, it is considered that the issues associated with the site’s development can be fully accounted for in a revised Policy context as per that set out in the Deposit version of the Plan. The diminished size of this employment allocation in the Revised Deposit Plan could potentially stifle the opportunity for Newport to secure large scale employment generating development over the period of the LDP which will be of a prestigious nature for the City. The importance of such potential should not be unduly lost by the downgrading and downsizing of this allocation as is the case in the Revised Deposit Plan. The policy context set out in the Deposit Plan made it clear that full consideration will need to be given to nature conservation issues and impact on the sensitive area in which it is sited. This policy context also makes it clear that any future proposals for the site will need to meet strict and stringent tests of compliance and be of significant benefit to the city. It is therefore considered that this policy context should be reintroduced and for the allocation to be enlarged back to the 142 hectares identified within the Deposit Plan. This would include the Tata owned land that has been excluded from the Revised Deposit Plan.

3.7 It is also important to note that this area of land that is now excluded from allocation EM1(ii) lies alongside the safeguarded route for the proposed M4 relief road. This area could, over the life of the LDP, experience significant change and transformation and be well placed to deliver employment development of national significance as new opportunities emerge. It is therefore considered important to safeguard such an opportunity, which cannot be delivered elsewhere (within such proximity to the M4) so that this strategic opportunity is not lost. Any development of the site would clearly need to take full account of special qualities of this area, as required by the plan in its current format. The employment allocation in the LDP should therefore revert back to the position established in the previous Deposit version of the Plan in order to secure the objectives and visions for the city as a whole.

4. Policy EM2(ii) – Regeneration Sites

4.1 As set out above, we welcome the partial allocation of the Tata land under allocation EM2(ii) in the Revised Deposit Plan. This allocation identifies 122 hectares of land at the Llanwern former tipping area south of Queensway for B1, B2 and B8 uses. Such an approach is broadly consistent with the representations that have been made to the LDP process to date by Tata (copies included at Appendix 1). This allocation clearly recognises the significant opportunity presented by this gateway site and the significant changes that will be delivered to this part of Eastern Newport over the plan period.

4.2 Whilst we welcome such recognition under allocation EM2(ii), we do not consider that this policy context is broad enough to fully take account of the development opportunity presented by the Tata site and landholdings.

4.3 As detailed at both the Candidate (and Major Candidate) site submission stages, as well as the Deposit stage consultation, this area of Newport is due to undergo significant changes over the lifetime of the LDP, which can be summarised as follows:

- To the west, St Modwen has secured planning permission for a major new community on the site of the former heavy end* of the steelworks. A total of 4,000 new homes is proposed in a transformed landscape, together with a new local centre, and a new business park;

- The proposals will also significantly alter the accessibility of the area. The Queensway will become a public highway (as identified in the Revised Deposit Plan) and will connect the southern...
distributor road (at the retail park) to junction 23 of the M4. In addition, a new rail halt is proposed (at the junction of St Modwen’s site and New Llanwern), together with the provision for a 1,000 space park and ride facility.

4.4 In this light, it is felt that the urban regeneration allocation for this site would benefit from widening of the range of land uses that may be considered acceptable at the site, beyond those of the prescribed B1, B2 and B8 uses. It is felt that limiting the development of this site to these uses only could potentially unduly constrain development activity and not be flexible enough to accommodate other important and deliverable land uses over the plan period – uses that would both complement and enhance the wider regeneration initiatives within this part of Newport.

4.5 As set out in greater detail in our previous representations to the emerging plan (Appendix 1), we would therefore request that this policy be widened to include reference to the following uses (which formed part of our previous representations):

- Residential;
- Hotel and Roadside Uses;
- Energy and waste to energy facilities.

4.6 Such an approach would be consistent with the overall sustainability aims of the Revised Deposit LDP by ensuring that truly mixed use communities can be delivered at sustainable transport locations that are capable of delivering large scale redevelopment.

4.7 We would therefore suggest that the supporting text which accompanies Policy EM2 (ii) at paragraph 6.17 of the Revised Deposit Plan be amended to read as follows: Llanwern Former Tipping Area South of Queensway

This area of land south of Queensway will provide a mixed use development opportunity that will capitalise on the changing nature of this part of the East Newport. The site will be suitable to accommodate a range of land uses including B1, B2, B8 and more specialist energy and waste related uses. The opening up of the Queensway and the potential M4 relief road could potentially facilitate other complementary uses such as roadside activities (hotels etc). Ancillary residential development may also be considered as part of a mix of land uses, subject to compliance with all relevant policies of the LDP.

4.8 We trust that this allocation will be amended to include reference to these additional uses and the LDP amended accordingly.

12/02/2014
Page 352 of 1581
### Representation Details

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**Document:** Revised LDP, p.76

**Policy:** H16.01

**Map:** Proposals East: Proposals Plan - East

**Summary:** Delete Hartridge farm Road Gypsy and Traveller site.

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**CE2, CE3**
Revised Deposit Local Development Plan Consultation (June 2013)

Representations on behalf of Tata Steel

I write with regard to the above document which has recently been published for consultation. The representations set out below are made on behalf of our clients, Tata Steel, and relate specifically to Policy H16. Our clients operate the Llanwern Steelworks to the south of the permanent gypsy and traveller residential site proposed at Hartridge Farm Road.

We recognise the need for the Council to allocate a permanent residential site for gypsy and travellers within the Local Development Plan (LDP). We do not, however, believe that the proposed allocation at Hartridge Farm Road is appropriate. The allocation of land at Hartridge Farm Road as a permanent residential site fails to meet the necessary tests of soundness and is unsound. Our concerns relate specifically to the site assessment methodology adopted and the appropriateness of the allocation itself.

Site Assessment Methodology

We have concerns regarding the robustness of the assessment methodology adopted by the Council and the implications this has had on the allocations contained in Policy H16. In June 2012 the Cabinet asked the Scrutiny Committee for Community Planning and Development to revisit the issue of identifying gypsy and traveller sites for inclusion in the LDP. This was intended to ensure that the sites included in the plan were "the result of a transparent and democratic process". At this stage a large number of sites were assessed by a working group against Welsh Government Circular and the Good Practice Guide criteria. The initial criteria were identified as:

- C1/C2 flood risk areas
- Sites of Special Scientific Interest/Conservation Areas
- Green wedge/Green Belt
- Hazards on site
- Existing use
- Proximity to local facilities
- Vegetation access to site
- Privacy
- Public transport links
- For transit sites proximity to main travel routes

This process led to the group undertaking site visits to circa 40 sites, before identifying a short list of 11 sites deemed to best fit the criteria.

Following this process the working group identified five preferred sites, which were subsequently agreed by the Scrutiny Committee and reported back to the Cabinet in November 2012. The Cabinet noted the recommendation of the Scrutiny Committee and requested that Officers undertake a detailed site appraisal of the 11 short-listed sites to consider site deliverability. At a meeting held on 13 March 2013 the Scrutiny Committee agreed to endorse a series of site appraisal topics against which the potential gypsy and traveller sites were being appraised. It is unclear why these topics were only agreed at this stage of the process, rather than at the start of the appraisal process.

Having concluded the site appraisal the Scrutiny Committee considered the final site appraisal results in April 2013, before reporting this back to the Cabinet in May and Full Council in June 2013. The report to the Scrutiny Committee held on 24 April 2013, and the debate at the meeting itself, highlights a flaw in the methodology adopted by the Council. The report notes that only the site capable of accommodating two of the existing families requiring accommodation in Newport was Hartridge Farm Road (taking account of potential growth). The report recognises that one option could be splitting the families, but advised Housing Officers consider "that it is not appropriate to split a family onto two or more smaller sites". As such the report concludes that "if the families are not split up, it appears that the Hartridge Farm Road site is the only option".

This highlights an underlying flaw with the site search and assessment process. It is also incorrect that the Hartridge Farm Road site was the only option, it was just the only option presented to Members from those sites shortlisted.

The Council identified its gypsy and traveller need through the Gypsy and Traveller Accommodation Assessment (2010) and subsequent research, liaison and assessment of gypsy and traveller families in Newport by Housing Officers. This process concluded that there were three existing families in Newport that needed to be accommodated. The research also found that the families required the following level of pitches:

- Family A – had an immediate housing need of 13 pitches, predicted to increase to 23 by 2026
- Family B – had an immediate housing need of 7 pitches, predicted to rise to 13 pitches by 2026
- Family C – had an immediate housing need of 7 pitches, predicted to rise to 13 pitches by 2026

The Fordham Assessment also identified a need for 7 further pitches on a transit site. Having known the requirements of the families that require housing, the issue of site size should have been a primary consideration from the start of the site search process in June 2012 – rather than when concluding the process in April 2013. If it was deemed inappropriate by the Council to accommodate single families across more than one site, the search process should have automatically ruled out any sites that could not accommodate 7 or more pitches during the first sieve. The process should also have given much greater weight to identifying sites of sufficient size to accommodate the requirements of the larger families (13 and 23 pitches). It is recognised by the Council that pitches should equate to circa 400 sq m, or 0.04 ha. It would therefore have been straightforward to make an initial judgement on the acceptability of site capacity.
Instead it appears that site capacity has been a consideration very late in the process, which has resulted in Members (at Scrutiny Committee, Cabinet and Full Council) being presented with Hartridge Farm as the “only option” to accommodate two of the families. The only alternative presented to Members was going against recommended guidance and splitting the families up, or to “amend the sites to be included in the Local Development Plan in some other way”. This effectively left the Members with the option of accepting Hartridge Farm Road, splitting up the families or being left with no immediate solution to accommodating the need. If site capacity had been identified as a key criterion for site selection at the outset, there may well have been a number of sites that on balance were not discounted from the process at an earlier stage. Placing greater emphasis on selecting sites to meet the required capacity would also have increased the chances of identifying other sites of a suitable size.

The Scrutiny Committee and Cabinet had no decision making powers in this matter, with a final decision being taken by the Full Council on 4 June 2013. At the meeting an amendment was moved to delete the allocation of Hartridge Farm Road as a permanent residential site. The minutes of the meeting show that the Development Services Manager and Head of Law and Standards both advised that if the allocation was removed from the plan, it would be deemed unsound as it would not meet the assessed needs of gypsy and travellers. Presented with this option a majority of Members voted against the amendment. The removal of the allocation at Hartridge Farm Road would have left the plan with no provision for gypsy and traveller sites as worded. This issue should, however, have been addressed before the Full Council meeting, at which Members were left with little option but to agree the proposed allocation. Instead it should have been recognised that the site was unsuitable for the scale of provision proposed and that the site search process was not robust. The process should therefore have been reopened and undertaken with a greater emphasis on identifying sites capable of accommodating the actual level of need from the outset.

The failure to consider the importance of site capacity earlier in the search and assessment process has led to the Council allocating a site that is contrary to national guidance in the Revised Deposit Plan. Policy H16(i) is therefore unsound. The specific reasons for this are explored in more detail below.

### Site Size

Policy H16(i) allocates Hartridge Farm Road to provide accommodation for three separate families and a total of 43 pitches over the plan period. As accepted by the Council this would “potentially create one very large site and be contrary to Welsh Government guidance”. This is something that officers expressed reservations about in a report to the Scrutiny Committee for Community Planning and Development on 29 October 2012. Paragraph 3.1.1 of the Welsh Government Good Practice Guide in Designing Gypsy Traveller Sites in Wales (2009) states that “the ideal size of a site should generally be no more than 12 pitches.” It goes on to advise that “consultation with the Gypsy and Travelling community has shown that there is a preference for smaller sites, around 10-12 pitches.” The guidance does recognise that “local authorities may consider it necessary to be flexible by allowing more pitches on a site when taking into account local circumstances and the current level of need.” This is, however, on the basis that “sites should presume to be no bigger than between 15-20 pitches”.

The Newport Gypsy and Traveller Accommodation Assessment (2010) also indicated that there was clear support from the gypsy and traveller community for “smaller, family-sized sites” rather than “a single large one”. It was noted that smaller sites are less obtrusive visually, are less likely to attract opposition from the settled community and are commonly easier and more efficient to manage. The assessment therefore concluded that the planning of residential sites should “take into account the preference stated in questionnaire responses to live on smaller family sized sites and the expressed wish of those interviewed not to have to live on large ethnically mixed sites” (para. 9.6). As a result this is referred to directly in the recommendations set out within the report.

This was also supported by subsequent consultation undertaken by the Council with local gypsy and traveller families in February 2011. This process confirmed that the families believed that an essential criterion for site selection should be a preference for “small sites”. The Council has, however, gone against national guidance, the recommendations of the Gypsy and Traveller Accommodation Assessment (2010) and subsequent consultation with local gypsy and traveller families. Instead, they have allocated one permanent residential site with a view to accommodating three separate families and a total of 43 pitches. This is significantly bigger than national guidance and seeks to accommodate three separate families within a single site.

When agreeing to publish the Revised Deposit Plan for consultation the Full Council was advised that a majority of the families were comfortable with the allocation and identified Hartridge Farm Road as their preferred site. What is unclear is what alternative options were presented to the families. On the basis of the reports to Cabinet and Full Council it is possible that the families were given the option of Hartridge Farm Road being the only available site that would not result in the families being split up. This therefore does not necessarily demonstrate that the families support this site against other viable alternatives.

### Site Location

The decision to allocate Hartridge Farm Road as the only permanent residential site is also questioned in terms of the site location. The Gypsy and Traveller Accommodation Assessment (2010) concluded that “based on current and recent locations of sites in Newport, residential provision should be in the south west of the County Borough, where Gypsies and Travellers have chosen to establish unauthorised developments” (para. 9.6). The only permanent residential and contingency residential sites have, however, been allocated on the south eastern side of Newport.

### Site Specific Constraints

The Welsh Government Good Practice Guide (2009) states that “local authorities should avoid locating sites next to or near hazards which present specific risks to children and adults such as dual-carriage-ways, industrial sites, river or canals” (para. 3.2.2). The site is, however, located within close proximity to the Southern Distributor Road, which is a key arterial route serving Newport. The site also adjoins the mainline railway. The railway also includes sidings related to our clients operational site, which are the largest sidings on the mainline between Swansea and Paddington. The proximity of both the Southern Distributor Road and mainline railway are considered to be a specific risk to potential occupants of the site. Due to limited indoor space, it is recognised that the outdoor environment is particularly important to gypsy and traveller children. The location of the site provides opportunities for access to part of the mainline railway network and connecting spurs, which would raise significant concerns for the safety of future residents. The site is also within close proximity to existing industrial uses, which again raise concerns for the health and safety of potential occupants and the suitability of the site.
Aside from health and safety concerns, the proximity of the site to the Southern Distributor Road and the mainline railway network also raises concerns regarding the residential amenity of potential occupants. The nature and type of accommodation forming part of a gypsy and traveller site is clearly more susceptible to noise pollution than homes of the settled community. The proximity of the RSPCA Centre is also likely to have a direct impact on the residential amenity of potential occupants. This is recognised by the Council who advise that a 1.8m high noise attenuation fence would be required adjacent to the RSPCA Centre, alongside the mainline railway, and between the Southern Distributor Road. It is questionable whether this would be an acceptable solution for potential occupants.

The appropriateness of the pedestrian access to the site is also questionable. There are currently no pavements serving the site meaning that pedestrian would have to walk in the carriageway. This would raise concerns regarding the safety of potential occupants and the sustainability of the site in terms of access to nearby facilities. We also have similar concerns regarding the suitability of the existing vehicular access, which is recognised by the Council as being sub-standard. The Welsh government Good Practice Guide (2009) states that roads should be wide enough to allow chalet/mobile homes access on low loader vehicles and should be wide enough to allow two lorries to pass each other. We do not believe that Hartridge Farm Road is capable of accommodating this level of movement.

We are concerned that the scale of the proposed allocation, 43 pitches and potentially c.129 caravans will be difficult to manage. National guidance makes it clear that smaller sites are much easier to manage. This situation is likely to be more difficult to manage given that the allocation is intended to accommodate three separate families on one large site. As a result, there are increased risks to the occupants health and safety relating the Southern Distributor Road, mainline railway and our clients railway sidings.

Tests of Soundness
Policy H16(i) fails to meet the requirements of the relevant tests of soundness and is therefore unsound. The allocation fails to meet tests CE2 and CE3 in particular. Test CE2 requires allocations to be realistic and appropriate having considered the relevant alternatives and are founded on a robust and credible evidence base. The allocation is not, however, realistic or appropriate given that it is contrary to national guidance and is subject to a number of site specific constraints. The evidence base on which this allocation is drawn from is also flawed, given the failure to properly assess site capacity at an early stage in the process. This has led to the alternatives not being fully considered during the search and assessment process. The site is also subject to a number of site specific constraints that mean that it is unsuitable as a permanent residential site. These focus on health and safety and residential amenity concerns and are heightened by the scale of development proposed on the site and the accommodation of three separate families on one site. The allocation also fails Test CE3 on the basis that there are no clear mechanisms to implement the proposals. Given the scale of the proposed allocation it is not considered to be a realistic target.

Conclusion
National guidance makes it clear that sites bigger than 20 pitches should only be developed where there is a clear and demonstrable need to act against such a presumption. The Council is proposing to provide residential provision more than twice the size of the recommended maximum number of pitches. Given the flaws in the site search process it cannot be demonstrated there is a need to act against this presumption. It is recognised that two of the existing families are predicted to require 13 and 23 pitches respectively over the course of the plan period. It is, however, clear that accommodating this scale of development on separate sites would not be as far removed from national guidance as allocating the entire requirement on one site. The Council should have considered alternative sites that are capable of accommodating sites of between 7 and 23 pitches, as per the actual requirement. Instead, the focus on site capacity has come very late in the process (April 2013). This has led to Hartridge Farm Road being seen as the only viable option, despite a recognition that it is contrary to national guidance.

I would be grateful for confirmation that these representations have been received.

12/02/2014
The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.

It is acknowledged that the size of the Hartridge Farm Road site is larger than Welsh Government guidance suggests, however this will avoid the need to split any of the individual families, which is an important factor for the families themselves. The size is sufficient to accommodate all 3 families, which would meet Newport’s residential need for Gypsy/Traveller provision. The proposed layout would use screening to effectively create 3 independent sites within the curtilage of the whole site. The site would also be screened from the road and nearby residential properties.

The site is within the settlement boundary and considered to be a sustainable location. Remote locations outside of the settlement boundary have poorer access to amenities and place more of an emphasis of car travel, therefore deemed to be more unsustainable. Site design can ensure it is well screened from the nearby RSPCA Centre and Llanwern High School.

A noise assessment has been undertaken for Hartridge Farm Road. It is proposed that a 1.8m high noise attenuation fence is constructed adjacent to the RSPCA Centre, alongside the mainline railway and between the SDR and north-eastern part of the site.

The draft indicative layout of this site shows that a significant buffer could be provided between the RSPCA Centre and the pitches.

It is acknowledged that the Hartridge Farm Road site will require improvements to the access road including the provision of a length of pavement. This will be agreed as part of a planning application and is not considered insurmountable.
Newport City Council Local Development Plan

Representation Details

Filter: (No grouping)

Rep'n/Para/Policy Representer Agent Accession No Date Lodged Late? Source Type Mode Status Status Modified
1423.L1//GP03 Mobile Operators Association Mono Consultants Ltd - London 12/07/2013 W O M

Document:Revised LDP, p.41
Policy: GP03
Summary: Propose new policy for telecommunication developments

Item Question Representation Text
3 3 New Policy Yes

The Mobile Operators Association (MOA) monitors all emerging development plan policies and supplementary planning guidance that relate to telecommunications development and those which would have an impact on their member’s agreements to supply a mobile telecommunications service in the UK. Mono Consultants undertake this project on behalf of the MOA. We would take this opportunity to comment that we consider it important that there remains in place a telecommunications policy within the emerging Local Development Plan. It is recognised that telecommunications play a vital role in both the economic and social fabric of communities. National guidance recognises this through the Technical Advice Note (Wales) 19: Telecommunications. TAN19 gives clear guidance as to the main issues surrounding telecommunications development. These include the legislative framework, siting and design issues, levels of consultation and issues surrounding electromagnetic fields (EMFs). Clear guidance is also given regarding what should be included within local plan (now LDP) policy. This guidance states that local plans (LDPs) should set out criteria based policies to guide telecommunications development and that whilst regard should be had to siting and design considerations, operational efficiency should not be inhibited. The Code of Best Practice on Mobile Phone Network Development as issued by the Welsh Assembly Government in 2003 builds on the MOA’s Ten Commitments to Best Siting Practice to ensure that the industry is alive to the concerns of local communities and consultation is built into the development process. On this basis we would suggest that within the Local Development Plan there should be a concise and flexible telecommunications policy. This should give all stakeholders a clear indication of the issues which development will be assessed against. We would suggest a policy which reads; “Proposals for telecommunications development will be permitted provided that the following criteria are met: (i) the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area; (ii) if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building; (iii) if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority. (iv) If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest. When considering applications for telecommunications development, the (local) planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology.” We would consider it appropriate to introduce the policy and we would suggest the following; “Mobile communications are now considered an integral part of the success of most business operations and individual lifestyles. With the growth of services such as mobile internet access, demand for new telecommunications infrastructure is continuing to grow. The authority is keen to facilitate this expansion whilst at the same time minimising any environmental impacts. It is our policy to reduce the proliferation of new masts by encouraging mast sharing and siting equipment on existing tall structures and buildings.” We trust you find the above comments of assistance. Please do not hesitate to contact me should you have any queries relating to the above matters.

Item Question Council Responses
12 12 Speaking at Public Examination No

2 2 Soundness of LDP Yes

The provision of suggested policy wording is very helpful. However, it is not clear that a specific policy for telecommunications is necessary, since such proposals may be judged under general design/amenity policies. Further guidance is provided in TAN19, and the LDP should not repeat national planning policy. Should further specific policy be needed regarding telecommunications development, Supplementary Planning Guidance could be provided.
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Document: Revised LDP, p.86
Policy: T01
Summary: Propose early dialogue with rail industry and provided the strategic vision for the future of the railway.
We write with regards to the Newport City Council Revised Deposit Local Development Plan published for public consultation by Newport City Council. Thank you for providing Network Rail with the opportunity to comment on the draft document.

Network Rail is the statutory undertaker responsible for maintaining and operating the country’s railway infrastructure and associated estate. It owns, operates, maintains and develops the main rail network. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail’s infrastructure. In addition to its operational function Network Rail has specific land interests which where relevant it would seek to promote through the policy making process.

Railway Infrastructure – Specific Policies

The draft Local Development Plan makes a number of references in relation to the railway infrastructure, including with regards to the provision of new train stations and early implementation of major rail infrastructure projects. We note these aspirations and we would encourage early dialogue with the rail industry and rail funders to develop/deliver the proposals further.

Increased Growth – Impact on Level Crossings

The delivery of new housing, facilities and services as proposed by the draft Plan could well impact upon the railway within the Newport area. The impact of development proposals on the safety of level crossings should be an extremely important consideration in emerging planning policy proposals. New development can result in a significant increase in the vehicular and pedestrian traffic utilising railway crossings, potentially impacting upon safety and service provision.

An increase in utilisation of a crossing could result in Network Rail being required to reduce train line speed in direct correlation to the increase in vehicular and pedestrian traffic using a crossing, to ensure safety is maintained. This would potentially have severe consequences for the timetabling of trains and the ability to successfully implement any future train service improvements, thereby directly conflicting with strategic and Government aims of improving rail services.

In this regard, we would request that the potential impacts from development affecting Network Rail’s level crossings are specifically addressed through planning policy. It is essential that Network Rail is consulted as Statutory Undertaker in any circumstances where a proposal would affect a level crossing. We therefore request that a policy is included which confirms that:

§ The Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway: Schedule 5 (f) (ii) of the Town & Country Planning (Development Management Procedure) order, 2010 requires that... “Where any proposed development is likely to result in a material increase in volume or a material change in the character of traffic using a level crossing over a railway (public footpath, public or private road) the Planning Authority’s Highway Engineer must submit details to both Her Majesty’s Railway Inspectorate and Network Rail for separate approval”.

§ Any planning application which may increase the level of pedestrian and/or vehicular usage at a level crossing should be supported by a full Transport Assessment assessing such impact.

§ The developer is required to fund any required qualitative improvements to the level crossing as a direct result of the development proposed.

Planning Applications – Close to Railway Assets

Notwithstanding the above comments, any development close to the railway assets has the potential to impact upon railway operations and safety. Network Rail would request the opportunity to comment on any future planning applications should they be submitted for sites adjoining the railway, or within close proximity to the railway, in the Newport area.

Finally, I have included a link to Network Rail’s website:


This link provides access to Network Rail’s Great Wales Route Utilisation Strategies which sets out the strategic vision for the future of the railway in this vital part of the railway network. This may aid the Council’s understanding of the future aspirations for railway development in Newport.
In relation to the comments regarding the impact upon level crossings, Policy SP15 makes reference to Planning Policy Wales. Section 8.7.2 of PPW states that ‘Transport Assessments (TA) are an important mechanism for setting out the scale of anticipated impacts of a proposed development, or redevelopment, is likely to have. They assist in helping to anticipate the impacts of development so that they can be understood and catered for’. It is considered that this would require developers to consider the impact upon adjacent level crossings.

In relation to the request that a policy be included requiring that the rail undertaker be consulted where a proposal for development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway. The Town and Country Planning (Development Management Procedure) (Wales) Order 2012 Schedule 4 (d) sets out this requirement, and it is not considered necessary to repeat this national legislation.

With regards to the request for a policy which requires developers to fund any qualitative improvements required to the rail network as a result of development, Policy SP13 states that S106 contributions will be considered on a case by case basis. Work on the Community Infrastructure Levy is on-going, and will be considering the inclusion of rail network contributions.
### Item Question  
**Representation Text**

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<td>Planning Obligations – Rail Contributions</td>
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Policy SP13 Planning Obligations sets out the policy basis in relation to developer contributions. Many of Network Rail’s stations and routes are already operating close to capacity. A significant increase in patronage may create the need for upgrades to the existing infrastructure; including (but not limited to) improved signalling, passing loops, car parking, improved access arrangements, station facilities or platform extensions.

As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements. Specifically, we request that the document or future policy requires developers to fund any qualitative improvements in relation to existing rail facilities and infrastructure required as a direct result of increased patronage resulting from new development.

The likely impact and level of improvements required will be specific to each station and each development meaning standard charges and formulae may not be appropriate. Therefore in order to fully assess the potential impacts and the level of developer contribution required it is essential that where a Transport Assessment is submitted in support of a planning application that this quantifies in detail the likely impact on the rail network.

To ensure that developer contributions can deliver appropriate improvements to the rail network we would recommend that Developer Contributions provide for rail and should include the following:

- A requirement for development contributions to deliver improvements to the rail network where appropriate.
- A requirement for Transport Assessments to consider the impacts to existing rail infrastructure to allow any necessary developer contributions towards rail to be calculated.
- A commitment to consult Network Rail where development may impact on the rail network and may require rail infrastructure improvements. In order to be reasonable these improvements would be restricted to a local level and would be necessary to make the development acceptable. We would not seek contributions towards major enhancement projects which are already programmed as part of Network Rail’s remit.

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**Item Question  Council Responses**
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**Council Response**

With regards to developer contributions to deliver improvements to the rail network, SP13 is considered to adequately address this. The Planning Obligation Supplementary Planning Guidance (July 2012) at paragraph 7.1 identifies ‘Public Transport’ as a type of contribution eligible to be considered a planning obligation. In addition, work on the Community Infrastructure Levy is on-going, and will be considering the inclusion of rail network contributions.

Policy SP15 – Integrated Transport requires development of a significant size to submit a Transport Assessment to establish anticipated impacts of development. Additional guidance is set out in PPW (5th Ed Nov 2012) and TAN 18: Transport (March 2007).

Network Rail is consulted on planning applications that impact upon the rail service. Consultation is undertaken in accordance with Welsh Government guidance i.e. Draft List of Statutory and Non-Statutory Consultees in the Planning Application Process (Sect 15).
### Representation Details

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Document: Revised LDP, p.86

Policy: T01

Summary: Supports Policy T1 of the LDP. Requested that impact of development of level crossings be considered by planning policy. The LDP should set a strategic context requiring developer contributions towards rail infrastructure.
Dear Sir/Madam,

Network Rail has been consulted by Newport City Council, on the Local Development Plan 2011 - 2026. Thank you for providing us with this opportunity to comment on this Planning Policy document. Upon the review of this document, Network Rail has the following comments to make:-

Section T1 Railways

The provision of new stations at Llanwern, Caerleon, Coedkernew and Pye Corner, Bassaleg. We would refer you to the Route Utilisation Strategy Document (RUS), Wales, (link below), Network Rail will continue to liaise and hold discussions with Newport City Council and SEWTA in looking at future new stations as identified in the RUS, Wales, and located within its area. The promotion of early implementation of train services on the Ebbw Valley Line into Newport. Any proposals to develop and enhance services on the Ebbw Valley Line, are currently being reviewed by the Welsh Government. The promotion of early implementation of electrification of the London – South Wales Mainline Network Rail is fully engaged in developing electrification along the South Wales mainline to Cardiff. Supporting applications for Government grant for new rail facilities Network Rail is willing to discuss any new rail aspirations with any promoters/stakeholders etc. Notwithstanding the above comments specifically linked to this planning document Network Rail is a statutory undertaker responsible for maintaining and operating the country’s railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail’s infrastructure. In this regard, please find our comments below.

Level Crossings Development proposals affecting the safety of level crossings is an extremely important consideration for emerging planning policy to address. The impact from development can result in a significant increase in the vehicular and/or pedestrian traffic utilising a crossing which in turn impacts upon safety and service provision. As a result of increased patronage, Network Rail could be forced to reduce train line speed in direct correlation to the increase in vehicular and pedestrian traffic using a crossing. This would have severe consequences for the timetabling of trains and would also effectively frustrate any future train service improvements. This would be in direct conflict with strategic and government aims of improving rail services. In this regard, we would request that the potential impacts from development affecting Network Rail’s level crossings, is specifically addressed through planning policy as there have been instances whereby Network Rail has not been consulted as statutory undertaker where a proposal has impacted on a level crossing. We request that a policy is provided confirming that: The Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway: Schedule 5 (f)(ii) of the Town & Country Planning (Development Management Procedure) order, 2010 requires that “Where any proposed development is likely to result in a material increase in volume or a material change in the character of traffic using a level crossing over a railway (public footpath, public or private road) the Planning Authority’s Highway Engineer must submit details to both Her Majesty’s Railway Inspectorate and Network Rail for separate approval”.

Any planning application which may increase the level of pedestrian and/or vehicular usage at a level crossing should be supported by a full Transport Assessment assessing such impact: and The developer is required to fund any required qualitative improvements to the level crossing as a direct result of the development proposed. Developer Contributions

The Local Development Plan should set a strategic context requiring developer contributions towards rail infrastructure where growth areas or significant housing allocations are identified close to existing rail infrastructure.

Many stations and routes are already operating close to capacity and a significant increase in patronage may create the need for upgrades to the existing infrastructure including improved signalling, passing loops, car parking, improved access arrangements or platform extensions.

As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements. Specifically, we request that a Policy is included within the document which requires developers to fund any qualitative improvements required in relation to existing facilities and infrastructure as a direct result of increased patronage resulting from new development.

The likely impact and level of improvements required will be specific to each station and each development meaning standard charges and formulae may not be appropriate. Therefore in order to fully assess the potential impacts, and the level of developer contribution required, it is essential that where a Transport Assessment is submitted in support of a planning application that this quantifies in detail the likely impact on the rail network. To ensure that developer contributions can deliver appropriate improvements to the rail network we would recommend that Developer Contributions should include provisions for rail and should include the following:

A requirement for development contributions to deliver improvements to the rail network where appropriate. A requirement for Transport Assessments to take cognisance of impacts to existing rail infrastructure to allow any necessary developer contributions towards rail to be calculated. A commitment to consult Network Rail where development may impact on the rail network and may require rail infrastructure improvements. In order to be reasonable these improvements would be restricted to a local level and would be necessary to make the development acceptable. We would not seek contributions towards major enhancement projects which are already programmed as part of Network Rail’s remit. Planning Applications
We would appreciate the Council providing Network Rail with an opportunity to comment on any future planning applications should they be submitted for sites adjoining the railway, or within close proximity to the railway as we may have more specific comments to make (further to those hereby enclosed).

**Rail Aspirations**


This link provides access to Network Rail’s Wales Route Utilisation Strategy (November 2008) of which sets out the strategic vision for the future of the railway in this vital part of the railway network. It is hoped that this will be of use to the Council to keep you up to date with future aspirations for railway development in Newport.

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<td>12</td>
<td>Speaking at Public Examination</td>
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<tr>
<td>13</td>
<td>Soundness of LDP</td>
<td>Neither</td>
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In relation to the comments regarding the impact upon level crossings, Policy SP15 makes reference to Planning Policy Wales. Section 8.7.2 of PPW states that ‘Transport Assessments (TA) are an important mechanism for setting out the scale of anticipated impacts a proposed development, or redevelopment, is likely to have. They assist in helping to anticipate the impacts of development so that they can be understood and catered for’. It is considered that this would require developers to consider the impact upon adjacent level crossings.

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With regards to the request for a policy which requires developers to fund any qualitative improvements required to the rail network as a result of development, Policy SP13 states that S106 contributions will be considered on a case by case basis. Work on the Community Infrastructure Levy is on-going, and will be considering the inclusion of rail network contributions.
Item Question: Representation Text

I believe there remains an opportunity to promote alternative or new candidate sites as part of this consultation. The purpose of this additional representation is to put forward a new site for consideration as a candidate site for allocation in the new Development Plan. This site is the ‘East Usk Yard’ in Newport, currently used for operational railway purposes. We seek allocation for residential development. Please find enclosed a completed Candidate Site Form and Site Location Plans for your reference. We believe that this is all the information your Council require to consider this site.

Additional Information Submitted - Available on Request

Item Question: Speaking at Public Examination

Tick-box reply: Neither

Item Question: Soundness of LDP

Tick-box reply: Neither

Item Question: Council Responses

Council Response: The proposed allocation for residential development at East Usk Yard was deemed appropriate for inclusion within the Revised Deposit LDP. The site has been allocated as a housing proposal.
**Document: Revised LDP, p.25, para.1.21**

**Policy:** SP11  
**Summary:** Change text of SP11

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**Soundness Test**

C2, CE1, CE2

**Representation**

This form should be read in conjunction with the covering letter submitted on behalf of St. Modwen Developments Limited, dated 26/07/13, which sets out the full background and justification for the representations.

The RDLDP’s policies (and stated objectives) support the Glan Llyn scheme and recognises its integral role in the plan’s overall strategy. However, we maintain (from our comments on the DLDP) that there is still an opportunity to emphasise the overall dividend the scheme will pay to Newport and south east Wales, or its genuine significance.

To reflect this we recommend two changes are made to the plan:

a) The introduction of a commitment to prioritising, supporting and accelerating the use of previously developed land before greenfields to Objective 1 (Sustainable Use of Land). We see merit in including a specific reference to Glan Llyn in this objective (or in a separate objective)
b) To change the text of Policy SP11 (or to add to it) to make it clear that the regeneration of the former steelworks will be given corporate priority and commitment from or by the Council. References to the significant benefits of the scheme should also be made to the supporting text.

**Speaking at Public Examination**

Glan Llyn is the largest single housing site within the City. It is important that the developers are represented at the examination in order to ensure that any discussion on housing numbers or new greenfield sites is informed fully.

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<td>2.2</td>
<td>Soundness of LDP</td>
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**Council Response**

Support for the site is noted. The Council response to the cover letter can be viewed in 1466.L11.

Planning Policy Wales sets out the overarching requirement for development to be placed on brownfield sites in preference to greenfield sites. The plan allocates 82% housing units on brownfield sites with the remaining 18% on greenfield sites (these calculations excludes the completions, windfall and small sites supply figures). The LDP is therefore compliant with Planning Policy Wales in terms that it has followed the search sequence criteria starting with the re-use of previously developed land and buildings within settlements which are located in areas accessible to jobs and services, where there is existing infrastructure and the scope to build sustainable communities.

It is considered that the Plan contains sufficient support for the Glan Llyn development. In terms of holding back greenfield sites it is unclear whether this type of approach could be achieved, particularly given that planning permissions for greenfield sites are already in place.
Newport City Council Local Development Plan

Representation Details

by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M
Rep'n/Para/Policy  Representer  Agent  Accession No  Date Lodged  Late?  Source  Type  Mode  Status  Status Modified

1466.L2//SP10  St Modwen Developments Ltd  Savills  25/07/2013  E  C  I  M

Document: Revised LDP, p.24
Policy: SP10
Summary: SP10 makes an overprovision for housing.

---

Item Question  Representation Text
---

3  3  New Policy

4  4  A new paragraph or new text

---

10  10  Soundness Test

C2, CE1, CE2, CE4

---

11  11  Representation

This form should be read in conjunction with the covering letter submitted on behalf of St. Modwen Developments Limited, dated 26/07/13, which sets out the full background and justification for the representations.

SP10 is considered to make an overprovision for new housing land and does not prioritise previously developed sites in the way that PPW advises. In this light our recommended changes are:

a) Reduce total housing provision to be more in line with WG projections (specifically by removing the 12% contingency that sees the total number being far in excess of the WG projections).

b) To make it clear that a proper sequence to land release and development is to be followed in each category (where this is possible) and that any greenfield sites will be kept in reserve and will be released only if there is a demonstrable failure of the City’s stock of previously developed sites.

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12  12  Speaking at Public Examination

Glan Llyn is the largest single housing site within the City. It is important that the developers are represented at the examination in order to ensure that any discussion on housing numbers or new greenfield sites is informed fully.

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Item Question  Council Responses
---

2  2  Soundness of LDP

Tick-box reply

No

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13  13  Council Response

There is no set flexibility figure required for housing supply within development plans. However, during the examination of the Brecon Beacons National Park LDP WG noted a notional figure of 10% but that needed to reflect local circumstances. Other authorities within South East Wales have a range of 12-20% flexibility. It is good practice to allow for unknowns and the need for flexibility within a development plan is inherent from National Planning Policy. In Newport’s case the majority of the housing supply has planning permission or is being progressed. Those remaining 9 sites without planning permission are in line with the overall strategy or regeneration needs of the plan. Together they provide a 12% oversupply which is considered appropriate to enable the plan to cope with uncertainties that may arise over the plan period.

It is considered that the Plan contains sufficient support for the Glan Llyn development. In terms of holding back greenfield sites it is unclear whether this type of approach could be achieved, particularly given that planning permissions for greenfield sites are already in place.
### Representation Details

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#### Document: Revised LDP, p.28

**Policy:** SP13

**Summary:** Further consideration should be given to the viability of sites.

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Additional material submitted - Please click here

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**Soundness Test**

C2, CE2, CE4

This form should be read in conjunction with the covering letter submitted on behalf of St. Modwen Developments Limited, dated 26/07/13, which sets out the full background and justification for the representations.

Greater recognition needs to be included in this policy to development viability being a fundamental consideration when seeking planning obligations and/or CIL. Where viability is proven to be hindered by planning obligation and/or CIL requirements, the Council will need to consider the planning obligation priorities for that particular development, having regard to the site location and local needs in the vicinity.

This approach should be taken by the Council in any event, and sufficient justification ought to be provided by the Council for all planning obligations to make sure they meet the planning obligations tests contained in Circular 13/97.

| 12 12          | Speaking at Public Examination |

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**Council Response**

The Community Infrastructure Levy Charging Schedule will be set at a financially viable level, following a Viability Assessment and consequent adoption following Examination. The methodology used to implement SP13 – Planning Obligations, will be set out in the Planning Obligations Supplementary Planning Guidance (SPG). The currently adopted Planning Obligations SPG addresses the issue of financial viability and the approach the Council will take in negotiating S106 agreements. The re-adoption of the Planning Obligations SPG is noted as a high priority in Chapter 14 of the Revised Deposit LDP.
### Representation Details

**by:** (No grouping)  
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**Document:** Revised LDP, p.65  
**Policy:** H01

**Summary:** Policy H1 makes an overprovision for housing sites. Delete site H1 (55)

### Item Question  
**Representation Text**

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<tr>
<td>77</td>
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11 11 Representation

This form should be read in conjunction with the covering letter submitted on behalf of St. Modwen Developments Limited, dated 26/07/13, which sets out the full background and justification for the representations.

Policy H1 is a key policy. Once all of the sources of housing are accounted for, this policy makes provision for a total of 11,622 new dwellings (including a 12% contingency) over the plan period (to 2026). This is substantially more land than is required. In this light, our comments on, objections to or recommendations for Policy H1 are as follows:

a) To support H1(47)  
b) To consider the introduction of a phasing dimension to the allocations  
c) To delete allocation H1(55)  
d) Or to reserve this site for release only if needed.

12 12 Speaking at Public Examination

Glan Llyn is the largest single housing site within the City. It is important that the developers are represented at the examination in order to ensure that any discussion on housing numbers or new greenfield sites is informed fully.

### Item Question  
**Council Responses**

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<th>Question</th>
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<tbody>
<tr>
<td>22</td>
<td>Soundness of LDP</td>
<td>Yes</td>
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</table>

13 13 Council Response

Support for Housing Allocation H1(47) is noted. The response to the cover letter can be found in representation 1466.L11.

It is considered that the Plan contains sufficient support for the Glan Llyn development. In terms of holding back greenfield sites it is unclear whether this type of approach could be achieved, particularly given that planning permissions for greenfield sites are already in place.

The woodlands site is located within the settlement boundary. The site is part of the disposal programme for the Council and as such the allocation reflects Council's intention to dispose of the land for future development.
### Representation Details

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<th>Representer</th>
<th>Accession No</th>
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**Document:** Revised LDP, p.67  
**Policy:** H01.47  
**Summary:** Support for H1 (47) housing allocation.

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**Item Question**  
**Representaion Text**  

3 3  
New Policy  
Yes

4 4  
A new paragraph or new text  
Yes

11 11  
Representation  
This form should be read in conjunction with the covering letter submitted on behalf of St. Modwen Developments Limited, dated 26/07/13, which sets out the full background and justification for the representations. We confirm our full support for the allocation of the Glan Llyn site under H1(47), which is identified to deliver nearly 3,000 dwellings within the plan period. This is in accordance with the outline planning permission granted for the redevelopment of the site. Significant progress has already been made towards delivering the framework for this level of housing provision and we see a trajectory which reasonably increases the rate of provision with key events and an improvement in market demand and conditions. This support should however be read in parallel with our objections to other allocations within Policy H1.

12 12  
Speaking at Public Examination  
Glan Llyn is the largest single housing site within the City. It is important that the developers are represented at the examination in order to ensure that any discussion on housing numbers or new greenfield sites is informed fully.

---

**Item Question**  
**Tick-box reply**  

2 2  
Soundness of LDP  
No

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**Item Question**  
**Council Responses**  

13 13  
Council Response  
Support noted and welcomed.
Representation Details

by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M

Rep'n/Para/Policy  Representor  Agent  Accession No  Date Lodged  Late?  Source  Type  Mode  Status  Status Modified

1466.L6//H04  St Modwen Developments Ltd  Savills  25/07/2013  E  C  M

Document: Revised LDP, p. 70
Policy: H4
Summary: Wording of Policy H04 should be amended.

Item Question  Representation Text
3 3  New Policy

10  Soundness Test
C2, CE2, CE4

This form should be read in conjunction with the covering letter submitted on behalf of St. Modwen Developments Limited, dated 26/07/13, which sets out the full background and justification for the representations.

Whilst the level of affordable housing will be examined as the plan progresses, it is recommended that the policy wording is amended to reflect the modern approach to affordable housing delivery. In this respect, the proposed 30% provision ought to be treated as a target figure – to allow for flexibility, should viability justify so, and policy or commentary explicitly allow for innovative forms of affordable housing, which may not meet the TAN 2 definition, but deliver some form of affordable housing (for example developer shared equality, low cost home ownership). The policy should also include the ability to deliver affordable housing off site, for example though contributions to improvements to existing and empty housing stock.

12  Speaking at Public Examination

Item Question  Council Responses
2  Soundness of LDP

There is a clearly evidenced percentage of need within Newport, which stands at 86%. The policy therefore requires 30% but allows for flexibility where viability can be taken into account. It is therefore not considered necessary to set out the required percentage as a target as the policy is inherently flexible. National Planning Policy sets out the definition of affordable housing, it is not appropriate for Local Planning Authorities to alter such definitions. The use of commuted sums to improve existing stock is used within Newport but is viewed as a method only to be used in exceptional circumstances because there is a real need for physical stock within development to provide mixed and balanced communities. Also there is a limited stock and high land value in certain areas of Newport which makes the application of commuted sums unviable.
**Representation Details**

by:  
(No grouping)

Filtered to show:  
(all of) Stage=L; Status=M

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Document: Revised LDP, p.39, para.(ii)  
Policy: GP01  
Summary: Change wording of Policy GP01.

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C2, CE1, CE2, CE4

Reference is made within PolicyGP1 to development proposals being designed to minimise energy requirements and incorporate appropriate renewable, low or zero carbon energy sources, including site energy provision, where possible. Whilst the aim to minimise energy requirements is supported, the provision of renewable, low or zero carbon energy sources within development sites is in its infancy and experience suggests that it is proving very difficult to find viable solutions for on site renewable energy production. The indication that on site energy provision should be made, where possible, should also include the caveat that it should also be viable and practical.

Change sought: change to GP1(ii) to read – Development proposals should: be designed to minimise energy requirements and incorporate appropriate renewable, low or zero carbon energy sources, including on site energy provision where viable and practical.

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**Tick-box reply**

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<td>Soundness of LDP</td>
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**Additional material submitted - Please click here**

It is not considered necessary to include ‘viable’, since the word ‘practicable’ is sufficiently broad to encompass physical and financial considerations.

12/02/2014
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**Document: Revised LDP, p.41, para.(ii)**

**Policy: GP03**

**Summary:** Amend Policy GP03.

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Criteria (ii) of Policy GP3 refers to capacity within the public foul sewer system and effectively would prevent development where deficiencies exist or satisfactory improvements cannot be provided. Whilst it is correct that developments should be served by appropriate infrastructure, there is significant concern that the emphasis within Policy GP3 is on the advice of statutory undertakers in determining whether satisfactory infrastructure exists. The overriding concern in this respect is that planning applications could be held up due to protracted consultation exercises with statutory undertakers, which has been the case in the past. Effectively, progress and regeneration will depend on the responses from statutory undertakers. Where appropriate, technical reports support applications demonstrating acceptable service infrastructure, or solutions to provide upgrades and, therefore, the grant of planning permission should not be delayed, subject to appropriate and relevant conditions. Change sought: delete criteria (ii) of Policy GP3.

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Consultation with statutory undertakers is an important part of the planning process. It is appropriate that development is only approved where essential infrastructure wither exists or can be provided and therefore the Policy should not be amended as suggested.
Policy: W02
Summary: Amend wording of Policy W02.

Item Question  Representation Text
3 3 New Policy
10 10 Soundness Test

C2, CE1, CE2, CE4

This form should be read in conjunction with the covering letter submitted on behalf of St. Modwen Developments Limited, dated 26/07/13, which sets out the full background and justification for the representations.

Policy W2 sets out broad criteria for new waste management facilities. Whilst such locations may be considered suitable by the Council, it is recommended that a caution note is added to advise restraint for possible waste management facilities at allocated B2 sites where these are close to existing or proposed communities. This relates back to comments made by SMDL in relation to Veolia’s proposals for a regionally scaled waste management facility at Llanwern. Whilst we are very pleased to see that this allocation has been removed from the plan, the same cautionary approach should be adopted for any future proposals.

12 12 Speaking at Public Examination

No

Item Question  Council Responses
2 2 Soundness of LDP

Tick-box reply

No

Item Question  Council Responses
13 13 Council Response

No changes considered necessary. Paragraph 11.9 notes that waste proposals will need to satisfy the guidance set out in TAN 21: Waste (2001), which covers proximity to communities and residential area considerations. Paragraph 11.11 also highlights the impact on residents, nearby dwellings and other sensitive properties as an important consideration. The plan must be read as a whole, and other General Policies cover issues such as residential amenity.
### Representation Details

**Document:** Revised LDP, p. 76  
**Policy:** H16.01  
**Summary:** Object to Gypsy and Traveller site H16 (i)

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<td>Soundness Test C1, C2, C3, C4, CE2</td>
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| 11            | This form should be read in conjunction with the covering letter submitted on behalf of St. Modwen Developments Limited, dated 26/07/13, which sets out the full background and justification for the representations.  
Although we are very pleased that the former speedway allocation has not been pursued in the RDLDP, we remain cautious given it was resurrected and reconsidered very recently and it is on this basis that we make these representations to safeguard that no further consideration is given to this site. It also needs to be said that the scale of the requirement facing Newport does appear to be very large. The extent of the allocated site at Hartridge Farm Road, Ringland (H16(i)) as shown on the proposals map makes this point for us and for this reason we strongly recommend that a review of the size of the requirement is made before the allocation is confirmed. For this reason, we have no option but to object to Policy H16 of the RDLDP. |

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<th>Item Question</th>
<th>Council Response</th>
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<td>It is acknowledged that the size of the Hartridge Farm Road site is larger than Welsh Government guidance suggests, however this will avoid the need to split any of the individual families, which is an important factor for the families themselves. The size is sufficient to accommodate all 3 families, which would meet Newport’s residential need for Gypsy/Traveller provision. The proposed layout would use screening to effectively create 3 independent sites within the curtilage of the whole site. The site would also be screened from the road and nearby residential properties.</td>
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12/02/2014
### Representation Details

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Document: Revised LDP, p.65

Policy: H01

Summary: Cover Letter to St Modwen's representation on the Revised Deposit LPD

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**Item Question**  **Representation Text**
Savills is instructed by St. Modwen Developments Limited (SMDL) to make representations to the Newport Revised Deposit Local Development Plan (RDLDP) in respect of the Glan Llyn scheme which sits on the former heavy end of the Llanwern Steelworks site. This is one of the Newport’s (and South Wales’) key regeneration projects and sits on a major road and rail gateway into both the City and the Principality.

As a headline, and given the content of the plan and the stage that the scheme has reached, we find much to support in the RDLDP. However, we are concerned about the total amount of development that the plan seeks to allocate for the City over the plan period (and the comments that this might draw) and the inclusion of new greenfield allocations. We also recommend that the plan’s clear preference for the use of previously developed land could be tightened (principally by changes to its objectives and strategy) and suggest a small number of corrections to the plan.

In this light, we have comments to make on the following policies or parts of the plan:
- Objective 1 – Sustainable Use of Land and SP11 – Sustainability and Eastern Expansion Area
- Policy SP10 – House Building Requirements
- Policy SP13 – Planning Obligations
- Policy H1 – Site 47
- Policy H1 – Site 55
- Policy H4 – Affordable Housing
- Policy EM2 – Regeneration Site
- Policy GP1 – General Development Principles
- Policy GP3 – Service Infrastructure
- Policy W2 – Sites for Waste Management Facilities

This letter records our comments on each of the above policies of the RDLDP. The comments are preceded by a brief review of the proposals at Glan Llyn and the planning position that has been reached. Because of the way in which the LDP process works our comments are expressed as objections to the plan (even though much of what we say is supportive). Equally, the forms also require us to declare whether we find the plan sound or unsound. For reasons mainly associated with SP10 and H1, we do consider that the plan fails the soundness test. However, the changes required are easily made and reinforce the basic (“brownfield”) strategy that the plan is promoting. As we have said already, there is significant alignment between the ambitions of SMDL for the site and the aims and content of the RDLDP - particularly on the need to give priority to previously developed land, and on this basis, much of what we say about the content of threshold be improved.

Glan Llyn – Current Position Background

SMDL is committed to the ongoing redevelopment of the former Llanwern Steelworks through the Glan Llyn development and the adjacent employment site. Reference is made to each of the sites under policies H1 and EM2. Subject to the small changes recorded in this letter, these policies capture the potential of the site to create a new mixed use but housing led urban extension.

Outline planning permission was granted in April 2010 for the whole scheme which will deliver 4,000 new homes and about a million square feet of a new business space. A new neighbourhood will transform this previously developed site and will include substantial new areas of open space and parkland, a new rail halt, two new primary schools and a local centre. Figure 1 below illustrates the extent of the site in the Masterplan that was prepared and submitted with the outline planning application. Development of the main new residential neighbourhoods will progress in three main sub areas, western, central and eastern and a masterplan for the western area was approved in November 2010. This contains the first 1,250 new homes, the western park and first primary school and the first part of the local centre. Applications (for the approval of reserved matters) have been made and approved for 307 new homes (and the infrastructure that will serve them) - about 30 of which have been sold and are now occupied. Figure 2 below illustrate the extent of the western sub area and the land included within the first development and infrastructure works (shaded red and orange). In addition to the site works, a scheme to upgrade the Queensway (which is proposed under Policy SP16(ii) in the RDLDP) to provide a major new link road has been accelerated and is underway Progress continues on the first phase of housing development, which is being delivered by Persimmon, Charles Church and Fairlake. A significant amount of work has and continues to take place on site with SMDL now looking to invest in improving the overall site environment by delivering substantial new landscaping along the Queensway (near the entrance of the site) and along the first section of the Gateway – all this will be done in the next planting season. The Western Park, a large area of open space to the east of the first phase of housing, will also be delivered as part of SMDL works to enhance the general environment. Detailed landscaping plans are due to be submitted to NCC shortly. This major public open space is the setting for the residential neighbourhood around it and will include the following key areas (as shown in Figure 3 below):

1. Western Lakes – the lakes define and formalise the north and southern boundaries to the park.
2. Arrival Plaza – an open arrival space for pedestrian use only, enjoying vistas over the park and lakes;
3. Parkland – located centrally between the two lakes this area is available for active and informal community space;
4. Parkway – a formal tree lined linear avenue along the eastern boundary, linking together the two lakes. It forms a pedestrian corridor for walkers and cyclists;
5. Local Link – A key pedestrian and cycle corridor linking the Western Park with its surroundings;
6. Woodland – the woodland forms an informal buffer between the lakes and parkland. Areas within the woodland will be opened up to allow opportunities for ecological enhancement, natural play and educational use.
7. Neighbourhood Equipped Area for Plan (NEAP) – this area will provide 1,000sq m of play area, 8 pieces of play equipment and a surfaced play zone. To the south of this area is the first part of the local centre. Developing this area is another key milestone for the scheme and SMDL is focussing on its delivery to support the new housing. Alongside all this work, SMMDL is keen to push forward with the second phase of infrastructure and development works and is looking ahead to delivering the second and third outlets in the western sub area in the very near future. Discussions have already taken place with NCC regarding the next phase of works and reserved matters applications detailing the proposals are due to be submitted in autumn 2013. This phase of housing, located around the pools, is likely to be delivered by St Modwen Homes (www.stmodwenhomes.co.uk), which specialises in constructing high quality modern homes and would be a new entrant to the Welsh homebuilding market.

All this site activity is very positive and reinforces SMDLs commitment to Glan Llyn and its future development. The new development (and that planned in the coming months) has been achieved in very difficult market conditions and at the beginning of the development process for a very large scheme. Very few other sites have made anything like the progress that Glan Llyn has in these conditions. Elsewhere progress has been slow, and this underscores the significance of the position reached and the clear commercial potential of the site to capture interest and deliver development in the hardest of times. It is therefore entirely reasonable for the Council to allocate a large part of the site for continued redevelopment over the plan period – and to expect rates of development to increase as economic conditions improve and as key milestones are made with the scheme. These will include the opening of the Western Park, the development of the first new primary school and first part of the local centre on the site and the introduction of the new rail halt. Regeneration of the site will also see one of Wales’ largest previously developed sites recycled and a major transformation take place at a key gateway for the City and for South east Wales (especially when the Queensway is opened to through traffic). This qualitative dimension of the scheme is just as important as the quantity of new housing and employment space that will be developed there.

Overview, Objectives and Spatial Strategy and Strategic Policies SP1 and SP11
We support Policy SP1, which sets out the overarching framework for achieving the plan’s strategy. There is clear emphasis to the important priority to be given to the effective use of previously developed sites (and to the plan’s “brownfield” strategy). The theme continues into the supporting text to the policy. Here it says:

“The planning system is primarily concerned with the use of land so one of the key actions that can be taken to achieve sustainable development is to focus on reusing previously developed land, and making the best use of facilities and services, as opposed to developing on greenfield sites.”

Though there is already clear reference to the sequential priority to be given to brownfield sites, there is merit in reinforcing this approach. The most straightforward and appropriate place for such a statement would be within the RDLDP’s overall objectives. As such, we recommend the introduction of a commitment to prioritising, supporting and accelerating the use of previously developed land before greenfields to Objective 1 (Sustainable Use of Land). We also see merit in including a specific reference to Glan Llyn in this objective given the scheme’s recognised integral role in the plan’s overall strategy. We are very pleased to see that the RDLDP’s policies (and stated objectives) place greater emphasis on the importance of Glan Llyn (compared with the previous Draft version of the plan – the DLDP) and goes some way to recognise the overall dividend the scheme will pay to Newport and south east Wales. We welcome Policy SP11 and support its supporting text which clearly prioritises this major regeneration scheme and recognises the integral role it plays in the plan’s overall strategy – a sustainable development strategy. We do, however, maintain (from our comments submitted to the DLDP) there is still an opportunity to emphasise the overall dividend the scheme will pay to Newport and south east Wales within the wording of Policy SP11. To reflect this we recommend two changes are made to the plan:

a) The introduction of a commitment to prioritising, supporting and accelerating the use of previously developed land before greenfields to Objective 1 (Sustainable Use of Land). We see merit in including a specific reference to Glan Llyn in this objective (or in a separate objective).

b) To change the text of Policy SP11 (or to add to it) to make it clear that the regeneration of the previously developed steelworks will be given corporate priority and commitment from or by the Council. References to the significant benefits of the scheme should also be made to the supporting text.

Policy SP10 – House Building Requirement
SP10 states that sufficient land will be made available for a total of 11,622 units to deliver a housing requirement of 10,350 units over the plan period – a level significantly higher than that proposed in the DLDP (8,750). Our comments to the DLDP set out some concern in relation to the Council’s intention to identify or allocate for a higher level of households – in excess of the most recent Welsh Government projections, which identify a need for 7,500 dwellings. The RDLDP seeks to provide even more housing and, again, whilst there is some explanation for the excess, this does not alter the basic housing requirement (which is the title of this policy) and nor does it justify a decision to plan for a significantly higher level of households. As a result the plan’s housing strategy should start from
The remainder of the policy states that land will be provided for through a combination of committed sites, the Eastern Expansion Area, new allocations and windfall sites. When these are added together (see comments under Policy H1), the plan proposes a total of 11,622 (allowing for a 12% contingency to the overall requirement). This again increases the figure well above the WG projections and we question whether this is necessary. If all the new allocations survive, then the sequence in points I – iv should be made clearer: at the moment it allows no distinction between the new allocations in Policy H1. This fault can be effectively resolved by clarifying that the preference in each category will be for the redevelopment of previously developed sites rather than the release of greenfield land. This installs the proper planning sequence. An alternative, if the Council was adamant that new greenfield sites are necessary, is to ensure that they are only made available later in the plan period (to provide a safeguard in the very unlikely event that the sites do not perform). In this light our recommended change is to make it clear that a proper sequence to land release and development is to be followed in each category (where this is possible) and that any greenfield sites will be kept in reserve and will be released only if there is a demonstrable failure of the City’s stock of previously developed sites.

Policy SP13 – Planning Obligations
Policy SP13 provides the policy framework for the Council to seek developer contributions towards community infrastructure, facilities and services. The policy is phrased so that it can apply to securing planning obligations under Section 106 or through levy receipts under the CIL Regulations 2010, as amended. Greater recognition needs to be included in this policy to development viability being a fundamental consideration when seeking planning obligations and/or CIL. Where viability is proven to be hindered by planning obligation and/or CIL requirements, the Council will need to consider the planning obligation priorities for that particular development, having regard to the site location and local needs in the vicinity. This approach should be taken by the Council in any event, and sufficient justification ought to be provided by the Council for all planning obligations to make sure they meet the planning obligations tests contained in Circular 13/87.

Policy H1 – Housing Sites
Policy H1 is a key policy. Once all of the sources of housing are accounted for, we calculate that it makes provision for a total of 11,622 new dwellings (including a 12% contingency) over the plan period (to 2026). This is substantially more land than is required:

A) If the most recent WG projection is used, land for a total of 7,500 new homes is required. If unchanged, Policy H1 provides for about 4,100 more than this or very nearly 55% more than the number required in WG’s most up to date projections.
B) If a figure of 8,750 (as proposed in the DLDP) is used, then the over provision is about 2,800 or 32%.

It is clearly a decision for Council’s whether they decide to over or under provide for housing (against the most up to date projections). However this is a significant over provision and whilst there is some value in explaining the scale of the difference in this policy, this neither recognises the scale of the difference nor explains the need for it. This is important because the Council has a number of sites with planning permission that it wishes to bring forward for redevelopment. Glan Llyn is at or near the top of that list and further unnecessary allocations (either because of type of land or location) could deflect attention away from these priorities. We know that the Council agrees with this basic proposition from earlier statements in the plan. This is significant because there is a substantial allocation for new or additional greenfield sites, under Policy H1. This is at the Woodland Site, Ringland (H1(55) – 300 units). This site should be deleted from the plan as it is not needed and could have an adverse impact on the delivery of key previously developed sites including Glan Llyn. The impact on housing numbers would be minimal and deletion of this new greenfield site would therefore improve the performance of the plan (and the principles and sequence it wishes to follow) without threatening strategy at any level.

Looking more positively at the terms of Policy H1, we can confirm our full support for the allocation of the Glan Llyn site under H1(47), which is identified to deliver a significant number of dwellings within the plan period. This is in accordance with the outline planning permission granted for the redevelopment of the site. Significant progress has already been made towards delivering the framework for this level of housing provision and we see a trajectory (based on development that is planned in the coming months) which reasonably increases the rate of provision with key events and an improvement in market demand and conditions. The development work that will take place in the coming months demonstrates SMDs commitment to the site and to delivering new housing. Even if there is doubt about performance (and experience suggests that some promoters will wish to alarm the Council about delivery), the allocations under H1 are so large that, even with the removal of the greenfield releases housing need over the plan period can be delivered with a substantial contingency. Although we cannot see how it can, if any residual doubt remains after this, then the right solution would be to reserve any greenfield sites for release at later stages in the plan. This follows the approach we adopted in our comments on Policy SP10.

In this light, our comments on objections to or recommendations for Policy H1 are as follows:
a) To support H1(47)
b) To consider the introduction of a phasing dimension to the allocations
c) To delete allocation H1(55)
d) Or to reserve this site for release only if needed.
Policy H4 – Affordable Housing
Policy H4 provides further guidance on the affordable housing requirements. It sets out the need to include 30% affordable housing on sites of 0.33 hectares or 10 or more houses (in settlement boundaries) or 0.2 hectares or 3 or more houses (in village boundaries). Whilst the level of affordable housing will be examined as the plan progresses, it is recommended that the policy wording is amended to reflect the modern approach to affordable housing delivery. In this respect, the proposed 30% provision ought to be treated as a target figure – to allow for flexibility, should viability justify so, and policy or commentary explicitly allow for innovative forms of affordable housing, which may not meet the TAN 2 definition, but deliver some form of affordable housing (for example developer shared equality, low cost home ownership). The policy should also include the ability to deliver affordable housing off site, for example through contributions to improvements to existing and empty housing stock.

Support to Policy EM2 – Regeneration Sites
The former Llanwern Steelworks site is also referred to under EM2 as regeneration schemes to be encouraged, as follows:

i. Llanwern Former Steelworks, Eastern End, 51 hectares for B1, B2 and B8 uses.

The site was included in the DLDP under two allocations (previously EM2(i) and H1(47)) and our comments to the previous draft requested that the dual allocation should be removed to avoid confusing readers. We are pleased to see that this has been done and support its removal.

Policy GP1 – General Development Principles – Climate Change
Reference is made within Policy GP1 to development proposals being designed to minimise energy requirements and incorporate appropriate renewable, low or zero carbon energy sources, including site energy provision, where possible. Whilst the aim to minimise energy consumption is supported, the provision of renewable, low or zero carbon energy sources within development sites is in its infancy and experience suggests that it is proving very difficult to find viable solutions for on site renewable energy production. The indication that on site energy provision should be made, where possible, should also include the caveat that it should also be viable and practical.

In this context, GP1(ii) should be changed to read:

Development proposals should be designed to minimise energy requirements and incorporate appropriate renewable, low or zero carbon energy sources, including on site energy provision where viable and practical.

Policy GP3 – General Development Principles – Service Infrastructure
Criterion (ii) of Policy GP3 refers to capacity within the public foul sewer system and effectively would prevent development where deficiencies exist or satisfactory improvements cannot be provided. Whilst developments need to be served by appropriate infrastructure, there is significant concern that Policy GP3 places too much emphasis on the advice of existing statutory undertakers in determining whether that infrastructure exists.

The concern in this respect is that planning applications (and regeneration) could be held up whilst solutions are considered with statutory undertakers. Where technical reports support applications and demonstrate acceptable service infrastructure (or solutions to provide upgrades) the grant of planning permission should not be delayed, subject to appropriate and relevant conditions. On this basis we recommend that criteria (ii) of Policy GP3 is deleted.

Policy W2 – Sites for Waste Management Facilities
Policy W2 sets out broad criteria for new waste management facilities. Whilst such locations may be considered suitable by the Council, it is recommended that a caution note is added to advise restraint for possible waste management facilities at allocated B2 sites where these are close to existing or proposed communities. This relates back to comments made by SMDL in relation to Veolia’s proposals for a regionally scaled waste management facility at Llanwern. Whilst this allocation has been removed from the plan, the same cautionary approach should be adopted for any future proposals.

Summary and Conclusions
SMDL’s representations are broadly supportive of the plan’s positive approach to Glan Llyn. This reflects the planning position reached and the clear potential of the scheme to deliver a mixed use urban extension on a previously developed site. The scheme is a major regeneration initiative and is a true commitment: planning permission has been granted, the site is in the hands of an active and experienced development company significant and substantial infrastructure has been installed and development is well underway. Policy SP1(ii) also makes it clear that the RDLP’s priority is to secure the regeneration of previously developed sites before greenfield land is released for development. This is sensible and sustainable and reflects a strong and established national policy direction.

There are, however, some concerns about some of its individual policies. As such objections have been made to ensure that the development of previously developed sites, such as Glan Llyn, remains
a priority throughout the plan period. This sees changes proposed to some of the plan’s most strategic policies as well as some of its detailed allocations. The changes are straightforward and see greater emphasis of the qualitative benefits from redevelopment projects, as well as a more open presentation of housing requirements and responses and the removal of what is clearly an unnecessary, additional greenfield housing allocation. These changes will improve the plan and help to make it sound.

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### Council Response

The support for the Plan and the update to the current position of Glan Llyn is welcomed and noted. The issues raised in the cover letter are dealt with in separate representations 1466.L1-L10.
### Representation Details

**Document:** Revised LDP, p. 75  
**Policy:** General G&T  
**Summary:** Support the proposed Gypsy and Traveller sites within Newport but raise two reservations on the Celtic Way site.

<table>
<thead>
<tr>
<th>Rep'n/Para/Policy</th>
<th>Representor</th>
<th>Accession No</th>
<th>Date Lodged</th>
<th>Late?</th>
<th>Source</th>
<th>Type</th>
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<td>South East Wales Racial Equality Council</td>
<td>29/07/2013</td>
<td>P</td>
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**Item Question**  
**Representation Text**
I write to support the adoption by the City Council of the Revised Deposit Local Development Plan.

SEWREC has considered the proposals, notably those in relation to the provision of sites for the Gypsy and Traveller communities, carefully. As part of that process we have discussed the proposals with members of the local Gypsy and Traveller population, but we would ask you to see this response as SEWREC’s endorsement rather than that of the community.

The Vision

SEWREC is pleased to see that the vision set out in the Local Development Plan makes clear the local authority’s commitment to the city’s ‘culture and heritage… with communities living in harmony’. As pointed out in the introduction to the Plan, Newport has a long history built around the crossing place over the river. As such it has been a route for travellers, including Gypsies and ethnic Travellers, for many hundreds of years.

As pointed out in the introduction to the Plan, Newport has a long history built around the crossing place over the river. As such it has been a route for travellers, including Gypsies and ethnic Travellers, for many hundreds of years. The development of the port upstream and much later the new port below the castle and at the mouth of the river inevitably led to the arrival of many people who had travelled from much further afield.

As a result Newport has had a Black and Minority Ethnic population for much longer than many other towns and cities even by UK standards and in most respects people of all’ races’ and religions have gotten along well.

This is perhaps not surprising when you compare census figures between 1801 (the first census) and 2011 (probably the last census to be held) which show a growth in the population of Newport from 6,657 to 145,700, much of this due to inward migration from other parts of the UK and elsewhere rather than a prodigious birth rate. In essence most of us are the descendants of migrants in Newport.

Gypsy and Traveller Sites.

Inherent in the vision set out in the Plan is the notion that planning is about meeting the needs of every part of our community and SEWREC is particularly pleased that many years of discussion at both officer level and at the level of elected members has led to firm proposals for the provision of accommodation that reflects the ‘culture and heritage’ of our Gypsy and Traveller communities.

The Transit Site

We welcome the decision to allocate the site listed in the Local Development Plan to accommodate Gypsies and Travellers while travelling through Newport with only slight reservations. The proposals appears to recognise that:
- There is a connection between Gypsy and Traveller communities and the City based upon traditional patterns of migration and family connections
- The provision of an authorised transit site will relieve many of the problems experienced by Gypsies and Travellers (for example access to basic services like water and refuse collection) and the communities that they live alongside (in terms of uncollected waste and disruption)

However, SEWREC has two reservations in relation to the transit site at Celtic Way, namely that the:
- Fordham research underestimates the need for transit pitches and the 7 pitches proposed will not be sufficient – but we welcome the inclusion of a contingency site in the Plan at the former Ringland allotments that could be used to provide additional pitches should this be necessary.
- Proposed site appears to be separated from other residential areas and surrounded by land earmarked for industrial development although we also recognised that this is an area that has frequently been used by Gypsies and Travellers and an area that they are familiar with. We therefore ask that particular attention be paid to the design of the site to ensure that it does not feel part of the industrial landscape.

Gypsy and Traveller Residential Accommodation

You will be aware that SEWREC had initially expressed concerns in relation to the size of the proposed development at Hartridge Farm Road, which exceeds the size of development recommended by the Welsh Government. Instead SEWREC has always argued for a number of smaller sites across the city, but within the vicinity of the A48/M4 corridor.

In preparing this response we have discussed the Hartridge Farm Road proposal with local Gypsy and Traveller families, have met with officers and visited the site. As a result we understand that:
- The proposal for the residential site is made up of 3 family-centred cul-de-sacs providing a greater degree of privacy than a single site of any other design would do
- Rents and services charges will be fixed in line with rules on affordable housing as would be the case for any other forms of social housing.
--This proposal is deliverable and that there are no reasons either within the planning rules or financial constraints why they cannot be delivered.

In conclusion SEWREC believes that both of these proposals will significantly improve the living conditions of Gypsy and Traveller families, most notably by giving them access to basic facilities and improved security of tenure. This in turn will have a significant impact on a wide range of other issues ranging from mental health to school attendance.

These proposals demonstrate considerable progress and goodwill on behalf of the Council and build on a recent history of better practice by Newport City Council (sometimes in collaboration with the Welsh Government). In fact, they are likely to put the City Council are the forefront of good practice with what we believe is the only dedicated transit site in Wales.

The Fordham Study states that 7 pitches are required for transit provision and this is based on the Council's knowledge of the size of unauthorised roadside encampments cover the years. In terms of the site design, this will be established in more detail during the full planning application process. General support for the sites is noted.
### Representation Details

**Newport City Council Local Development Plan**

**Rep'n/Para/Policy** 1501.L1/H01  
**Representor** Binnersley, Mrs A  
**Representor** Asbri Planning  
**Accession No** 26/07/2013  
**Date Lodged** 26/07/2013  
**Late?**  
**Source** E  
**Type** O  
**Mode** I  
**Status** M  
**Status Modified**

**Document:** Revised LDP, p.65  
**Policy:** H01  
**Summary:** Allocate Land at Parkwood House, Caerleon for residential use.

---

**Item Question** Representation Text

**Item Question** Add a new site  
**Representation Text** Yes

**Item Question** Candidate Site Name  
**Representation Text** Adj Parkwood House, Caerleon.

**Item Question** Settlemnts such as Caerleon, which function in their own right and which have a sustainable range of facilities are regarded as 'sustainable settlements' in various Local Development Plans in Wales and provision for appropriate growth is made. For this reason Policy H1 is objected to on the grounds that further provision, either by specific site allocations or by favouring amendments to the settlement boundaries for a sustainable mix of housing should be identified in Caerleon.

**Item Question** Speaking at Public Examination  
**Representation Text** Yes

**Item Question** Council Response  
**Representation Text** The supply of housing is considered to provide for a clear range and choice of housing which is a clear concern for many representors. The housing sites within the Plan are located across the City, with a clear focus on regeneration in the east as per the established strategy. The Plan provides a supply of affordable units for a mixture of needs as well as providing a mix of family homes and inner city living to cater for the broad housing market. The opportunity to provide homes in more rural locations has been investigated and there was no clear evidence to justify expansion to existing settlements. The Plan therefore has provided the opportunity for exception sites where such justification can be produced.

The site adjacent to Parkwood Close is a Greenfield site positioned adjoining the settlement boundary, in land designated as a Green Wedge and Countryside. The Green Wedge designation is considered necessary to prevent coalescence between Caerleon and Cwmbran, particularly given the development pressure around Caerleon. The plan seeks to promote the reuse of Brownfield sites in preference to extensive use of Greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities.

The forecast housing need has been assessed in the context of population and employment projections and current market realities. The plan allocates sufficient land to meet this requirement. Additional housing allocations in a rural location cannot therefore be justified. Furthermore, the release of the representation site for housing would be contrary to the Council’s strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

It is recommended that this site is not included in the Local Development Plan for residential purposes.

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12/02/2014

Page 387 of 1581
**Representation Details**

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<th>Rep'n/Para/Policy</th>
<th>Representor</th>
<th>Agent</th>
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<td>Asbri Planning</td>
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<td>26/07/2013</td>
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Additional material submitted: SA/SEA submitted

Document: Revised LDP, p.21

Policy: SP05

Summary: Remove Land at Parkwood Close, Caerleon from the countryside designation.

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<td>New Policy</td>
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</table>
| 8             | Candidate Site Name  
 Adj Parkwood House, Caerleon.                                                                                                                                                                                                                                                                                                          |
| 9             | Candidate Site Reference  
 1501.C1                                                                                                                                                                                                                                                                                                                                  |
| 10            | Soundness Test  
 CE2, CE4                                                                                                                                                                                                                                                                                                                                 |
| 11            | Representation                                                                                                                                                                                                                                                                                                                                  |

The site is bounded by existing development on two sides, with residential and utilities forms of development. To the west the development would not extend beyond the existing building line established by Parkwood House and residential development along the western edge of Trinity View. As such, the inclusion of the site beyond the settlement boundaries shown and in open countryside is inappropriate given the site's characteristics and its degree of containment and firm boundary to the north, in the form of Cefn Wood.

On this basis, Policy SP5 - Countryside, is objected to.

See attached Submission Document and Sustainability Appraisal.

<table>
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<th>Item Question</th>
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| 12            | Speaking at Public Examination  
 To discuss the representations and to respond to points directly raised by the Inspector.                                                                                                                                                                                                                              |

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<th>Item Question</th>
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| 2             | Soundness LDP  
 No                                                                                                                                                                                                                                                                                                                                 |

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12/02/2014
No change. The site is a Greenfield site positioned adjoining the settlement boundary, in land designated as a Green Wedge and countryside. The Green Wedge designation is considered necessary to prevent coalescence between Caerleon and Cwmbran, particularly given the development pressure around Caerleon. The plan seeks to promote the reuse of Brownfield sites in preference to extensive use of Greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities.

The forecast housing need has been assessed in the context of population and employment projections and current market realities. The plan allocates sufficient land to meet this requirement. It is considered that the housing allocations provide sufficient sites which allow flexibility and range and choice in the types of housing. Additional housing allocations in a rural location cannot therefore be justified. Furthermore, the release of the representation site for housing would be contrary to the Council's strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council's strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

A background paper 'Delivery and Implementation' has been produced to expand on the information supplied in Chapter 13 of the Deposit LDP. This sets out the proposed phasing, constraints and infrastructure requirements for each allocation. The delivery of each site is considered here, setting out the justification for its continuation in the plan based on evidence from developers and landowners. Some of the large brownfield sites allocated within the previous Unitary Development Plan have started construction e.g. Glan Llyn with 4000 homes and employment uses on the site. The impact on development by the economic recession is to be considered and the plan takes a long term view across the entire plan period.

The LDP sets out a strategy for growth which allocates an adequate supply of land for residential and employment uses. The supply of this land is not concentrated in one area but across the City. It is recognised that growth in the east is significant but the west has not been overlooked with large brownfield sites allocated at Novellis, former Whitehead Works and Monmouthshire Bank Sidings. The review of village boundaries has clearly considered the need for expansion in these areas and following their assessment boundaries have been tightened and allocations resisted due to the unsuitability of sites proposed in these unsustainable locations.

It is recommended that this site is not included in the Local Development Plan for residential purposes and remain within the countryside allocation.
### Representation Details

- **Representor:** Binnersley, Mrs A  
- **Agent:** Asbri Planning  
- **Accession No:** 1501.L3//SP07  
- **Date Lodged:** 26/07/2013  
- **Status:** M  
- **Type:** SA/SEA submitted

**Policy:** SP07  
**Summary:** Amend the Green Wedge boundary to remove land at Park House, Caerleon.

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<td>Representation</td>
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PPW makes it clear that only land that is strictly necessary to fulfil the purpose should be included within a green wedge and that clearly identifiable features should be used to establish 'defensible boundaries'.

It is clear that the inclusion of the site within a proposed green wedge is contrary to the above as its development would not prejudice the gap which exists between Newport and Malpas or Newport and Cwmbran. On this basis Policy SP7 is objected to.

The reasons are expanded on in the accompanying Submission Document which includes a Sustainability Appraisal for the Alternative Site.

See attached Submission Document and Sustainability Appraisal.

<table>
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<td>12</td>
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<td>Speaking at Public Examination</td>
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To discuss the representations and to respond to points directly raised by the Inspector.
In relation to the appropriateness of the site for inclusion in the Green Wedge allocation it is considered that the allocation is in accordance with the purpose of Green Wedge as set out in Planning Policy Wales. The area of land does serve to prevent the coalescence of two settlements (Caerleon and Cwmbran), assists in safeguarding the countryside from encroachment, and protects the setting of an urban area.

It is considered that the allocation of this area is in accordance with Planning Policy Wales in that normal planning and development management policies cannot provide the necessary protection (a countryside designation would not have the same level of control over certain types of development for example extensions to houses). It is considered that only land that is strictly necessary to fulfil the purposes of the policy has been provided in the designation based on the purpose of Green Wedge as identified in PPW.

Piecemeal removal of parts of the Green Wedge within the boundary of Newport would serve to undermine the intention of the various Green Wedge designations in both authority areas.
**Document: Revised LDP, p.24**

**Policy: SP10**

**Summary:** Brownfield led strategy is too restrictive and land at Park House, Caerleon should be allocated for residential development.

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<td>11</td>
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<td>Representation</td>
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</table>

Whilst it is acknowledged that the site in question would not contribute a major element of the growth proposed in the Plan Strategy, Policy SP10 - House Building Requirement is, nevertheless, objected to as the 'brownfield' led strategy in restricting appropriate levels of development in sustainable settlements such as Caerleon, does not provide for a sufficient range and choice of housing. This point is expanded upon in the objections to Policy H1.

See attached Submission Document and Sustainability Appraisal.

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<tr>
<td>12</td>
<td>12</td>
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To discuss the representations and to respond to points directly raised by the Inspector.
The supply of housing within the Plan is considered to provide for a clear range and choice of housing. The housing sites within the Plan are located across the City, with a clear focus on regeneration in the east as per the established strategy. The Plan provides a supply of affordable units for a mixture of needs as well as providing a mix of family homes and inner city living to cater for the broad housing market. The opportunity to provide homes in more rural locations has been investigated and there was no clear evidence to justify expansion to existing settlements. The Plan therefore has provided the opportunity for exception sites where such justification can be produced.

Planning Policy Wales sets out the overarching requirement for development to be placed on brownfield sites in preference to greenfield sites. The plan allocates 82% housing units on brownfield sites with the remaining 18% of units on greenfield sites (these calculations excludes the completions, windfall and small sites supply figures). The LDP is therefore compliant with Planning Policy Wales in terms that it has followed the search sequence criteria starting with the re-use of previously developed land and buildings within settlements which are located in areas accessible to jobs and services, where there is existing infrastructure and the scope to build sustainable communities.

The proposed site is a Greenfield site positioned adjoining the settlement boundary, in land designated as a Green Wedge and Countryside. The Green Wedge designation is considered necessary to prevent coalescence between Caerleon and Cwmbran, particularly given the development pressure around Caerleon. The plan seeks to promote the reuse of Brownfield sites in preference to extensive use of Greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities.

The forecast housing need has been assessed in the context of population and employment projections and current market realities. The plan allocates sufficient land to meet this requirement. Additional housing allocations in a rural location cannot therefore be justified. Furthermore, the release of the representation site for housing would be contrary to the Council’s strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

It is recommended that this site is not included in the Local Development Plan for residential purposes.
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Document: Revised LDP, p.75
Policy: H15

Summary: Support for the Celtic Way with a contingency site at Ringland Way are acceptable.

**Item Question**
**Representation Text**

11 11 Representation
I believe the proposal for a site at Celtic Way with a contingency of Ringland Way are sound and in accordance with the result of the extensive consultation undertaken during 2012. They have my full support.

12 12 Speaking at Public Examination
No

**Item Question**
**Tick-box reply**

2 2 Soundness of LDP
Yes

**Item Question**
**Council Responses**

13 13 Council Response
Support noted.
Representation Details

by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M

Rep'n/Para/Policy       Representer       Agent       Accession No       Date Lodged       Late?       Source       Type       Mode       Status       Status Modified
1504.L2//H16           Jenkins, Mr David W       W       27/07/2013       M

Document: Revised LDP, p.76
Policy: H16
Summary: Support Hartridge Farm Road site.

Item Question       Representation Text
11 11 Representation I believe the proposal for a site at Hartridge farm Road, with a contingency site at the former Ringland Allotments are sound and in accordance with the results of the extensive consultation undertaken during 2012. They have my full support.

12 12 Speaking at Public Examination No

Item Question       Tick-box reply
2 2 Soundness of LDP Yes

Item Question       Council Responses
13 13 Council Response Support noted.
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Document: Revised LDP, p.109
Policy: CF08

Summary: Support the inclusion of reference to rural tourism activity tourism in the countryside.

**Item Question**  
**Representation Text**

11 Support: Policy CF8 (formerly CF9) now include the additional words ‘RURAL TOURISM AND ACTIVITY TOURISM IN THE COUNTRYSIDE’ which recognises that there are a variety of types of tourism, which is to be welcomed. A new explanatory paragraph, 9.33, has been added, which is supported.

12 Speaking at Public Examination  
**Tick-box reply**

2 Soundness of LDP  
**Yes**

**Council Responses**

13 Support noted.
The introductory part of policy CF9 is too restrictive in that it and the explanatory text only refers to a 'leisure' designation, whereas the explanatory paragraph 9.34 recognises that 'leisure' is a complex and varied use. It only recognises the CMR as a 'golf and conference centre,' failing to recognise the evolution of CMR into a 'resort' destination that may well focus on sporting excellence (not just golf) and conferences but is now more than that and going forward the emphasis for its future is firmly on it as a resort where families can come to visit the area as well as visitors that come to attend a conference or take part in a sporting activity. The policy should be revised:

CF9 Celtic Manor

A LEISURE AREA IS DESIGNATED IN THE USK VALLEY AROUND THE CELTIC MANOR RESORT. WITHIN THIS, FURTHER DEVELOPMENT OF GOLFING, LEISURE, CONFERENCE AND TOURIST RESORTSUSES WILL BE APPROVED

SUBJECT TO:
The revised wording encompasses the reality of the use and provides flexibility to deal with the evolving tourist trade.

Policy CF9 (ii) be amended to include the words 'or improved' at the end.

(ii) THE PROPOSED DEVELOPMENT RESPECTING THE RURAL CHARACTER OF THE USK VALLEY, WHICH IS TO BE MAINTAINED OR IMPROVED;

Policy CF9 (iii) be amended:

(iii) ANY BUILT DEVELOPMENT BEING ESSENTIAL, DIRECTLY RELATED TO THE PRIMARY LEISURE USE OR ANCILLARY TO THE FUNCTIONING OF THE PROPOSED USE OR ENABLING DEVELOPMENT;

All built development should be closely associated with the proposed use but the word 'essential' on its own is overly restrictive in that future schemes may be required to carry out a 'needs analysis' which would be overly burdensome. This is also a stronger requirement than imposed by Policy CF11 – The Celtic Manor Resort may be better off without such a separate designation as it would then fall under CF11. CF 11 adequately covers the matter by requiring development to be ‘directly related.’

In addition, any built development would also have to be only for 'leisure' uses – ie. Changing rooms only with sports facilities, due to the word ‘essential’ being linked to the word ‘functioning.’ This limitation ignores the instances when an ancillary, complimentary or enabling use would provide an aspect of a leisure use that may not be ‘essential’ to operate the use but may be ‘essential’ in business terms to enable it to function as a resort. By its nature a resort includes a variety of complimentary uses that operate in a symbiotic way to deliver an overall leisure experience. As long as these uses are not large enough to stand on their own or cause harm to the countryside setting then it will not conflict with the purpose of protecting it.

The limitation to ‘leisure’ and ‘essential’ eliminates and complimentary or ancillary uses or any tourist uses, including tourist accommodation. The requirement for compliance with an approved Masterplan and protection established by policies CF10 (ii) and (iii) would suffice. If ‘functioning’ is to be retained then it should be added to by ‘or viability of the proposed use.’
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<td>Point relating to Policy CF9(ii) - the suggested amendment is not considered necessary as the Plan is seeking to retain a natural rural character to the area.</td>
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<td>Point relating to Policy CF9(iii) - the suggested word changing to criterion (iii) is not considered appropriate. Policy CF9 is proposing to manage development through a masterplan approach and within the context of a countryside setting. A policy approach restricting built development to those considered essential is consistent with national guidance.</td>
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## Item Question
Amend paragraph 9.34 as follows:

9.34 The Celtic Manor has developed into one of the foremost golfing, leisure, conference and tourist resorts in the United Kingdom, providing substantial local employment and a presence on the international scene. This was exemplified in the highly successful staging of the Ryder Cup in 2010. Further development of the area for predominantly outdoor leisure activities may be acceptable, subject to their complementing the existing facilities, and not undermining the very attractions that have made the development successful and being in accordance with a masterplan that has been approved by the Council.

Reason:
Surely a proposed outdoor leisure activity WILL be acceptable if it is (1) complimentary to the existing facilities, (2) does not undermine the very attractions that have made the development successful and (3) is in accordance with a masterplan that has been approved by the Council. The use of the word ‘may’ is being too cautious and not sufficiently positive. Amend the wording of paragraph 9.35 as follows:

9.35 A masterplan approach is therefore sought, whereby any proposals will have to demonstrate that they are in conformity with an overall concept. Any uses proposed will need to be appropriate for a rural area in general, and for the Usk Valley in particular. Residential development, other than for guest or staff accommodation or as enabling development where a viability case has been accepted to justify the development, will not therefore be appropriate, nor any other built development not directly related to the use in question.

Reason:
Staff accommodation directly associated and linked to the leisure resort is required for staff to reside on site. A resort use typically operates at unsociable hours to cater for its guests and it is a requirement that a proportion of staff live on site in a more sustainable location. The overall economic benefits of a successful resort are a significant factor in the continued prosperity of Newport. In order to maintain its competitive edge considerable investment is required in new or improved facilities and in order to do that additional enabling development is occasionally required. The revised paragraph simply creates the possibility and provides an element of flexibility for future evolutions of the tourist industry and the ability of the resort to respond to it.
### Representation Details

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Para 9.34 - removing the word 'may' with 'will' is not considered appropriate. Further development proposals are yet to be assessed against the relevant policies of the Plan and agreed Masterplan.

Further reference to being in accordance with the Masterplan is not considered necessary as it is set out in the Policy.

Para 9.35 - residential development in the countryside is contrary to PPW and TAN6: Planning for Sustainable Rural Communities unless it can meet the relevant tests set out in the guidance. Guest/tourist accommodation requirements should be established and set out as part of the overall Masterplan for the area. The suggested word changes are therefore not considered acceptable.
**Representation Details**

**Newport City Council Local Development Plan**

**Filtered to show:** (all of) Stage=L; Status=M

**Rep'n/Para/Policy** | **Representor** | **Agent** | **Accession No** | **Date Lodged** | **Late?** | **Source** | **Type** | **Mode** | **Status** | **Status Modified**
---|---|---|---|---|---|---|---|---|---|---
1666.L1/SP08 | Murray, Mrs H E | Boyer Planning - Cardiff | | 29/07/2013 | | | | | | |

**Document:** Revised LDP, p.22

**Policy:** SP08

**Summary:** Remove land at The Griffin, Bassaleg from the SLA.

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Representation Details

by: (No grouping)
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1.0 Introduction
1.1 Mrs H E Murray objects to the inclusion of land at The Griffin within the Trdegar Park Special Landscape Area designation. The land concerned is shown on the attached plan.

1.2 Inclusion of this land within the Trdegar Park Special Landscape Area results in the Deposit Local Development Plan being unsound in terms of the following tests:
- CE1 the proposed Special Landscape Areas do not provide a coherent approach to designation;
- CE2 in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base; and
- CE4 in that the Special Landscape Area does not provide a reasonable level of flexibility to allow the plan to deal with future circumstances.

2.0 Amplification

2.1 In terms of the evidence base for the designation of the Special Landscape Area (SLA) as referred to in the Deposit Plan there are a number of issues which need to be addressed.

2.2 Firstly the use of the LANDMAP information system in determining potential SLAs within Newport is driven by Planning Policy Wales (2012 5th Ed) in which paragraph 5.3.13 states that LANDMAP “...can help to inform supplementary planning guidance on landscape assessment (covering for example, local distinctiveness, special landscape areas and design).”

2.3 However, in reviewing the SLA Background Paper it is evident that the LANDMAP data appears to have been the main justification for the recommended location, extent and boundaries of the proposed SLAs. Whilst Planning Policy Wales states that the data should ‘help to inform’ supplementary planning guidance, in the case of the proposed Newport SLAs the Authority have relied upon the data rather than be informed by it.

2.4 In considering the above it is questioned as to whether all landscapes within the proposed designated areas are worthy of equal protection. One of the strategic criteria and tests for SLA designation stated in LANDMAP Information Guidance Note 1 is ‘coherence’. This is taken to mean that the boundaries of proposed SLAs should contain within them landscapes of distinctive unit exhibiting characteristics worthy of protection by virtue of their special qualities, distinctive features or rarity. It is therefore unclear as to how the test for coherence, as required in the guidance, can be satisfied across the relatively large land areas covered by the SLAs.

2.5 Concern is also raised in relation to the definition of boundaries. The TACP Report - Designation of Special Landscape Areas (2009), which is appended to the Background Paper, highlighted the need for the subsequent confirmation of the detailed boundaries by the Authority.

2.6 In this regard paragraph 5.2 of the SLA Background Paper states that “The proposed SLA boundaries for the LDP are justified as being located either: along Newport Authority’s administrative boundary, the proposed settlement boundary from the LDP or along structures, such as motorways, railways, rivers or canals, the edges of large woodlands or hedgerows. This ensures a consistent and clearly defined boundary line which will ensure future use of the allocation is unambiguous”.

2.7 However, whilst some further work has been undertaken it is evident that in order to provide a consistent approach the Authority have defaulted to the use of the settlement boundaries. While in some instances edge of settlement may be justified as the boundary in special landscape terms, in the majority of cases, it appears to be used without regard to landscape quality and adjoining influences.

2.8 We consider that far more scrutiny of SLA boundaries is needed to exclude those landscapes that lack special qualities, distinctive features or rarity, and to re-draw the boundaries as so to include only those landscapes worthy of protection by virtue of their special status.

3.0 Special Landscape Area Boundary
3.1 Given the above comments on the LANDMAP assessment and subsequent definition of the boundaries proposed by the Authority it is also important to highlight that the site at The Griffin adjoins the settlement boundary of Bassaleg and in particular Bassaleg Secondary School and its physical infrastructure. It is therefore evident that the site is subject to urban and human influences. The site is also well contained within a clear defensible boundary to the east and south, comprising of the adjoining Court Wood which is designated as a SINC. Further details relating to the site characteristics

12/02/2014 Page 402 of 1581
3.2 Therefore the characteristics of the site and surrounding environment have an impact upon the site and its inclusion within the designated Tredegar Park Special Landscape Area.

3.3 It is therefore unclear whether all landscapes within the proposed designated area are worthy of equal protection, given that it relates mainly to Tredegar Park and that a more detailed assessment of the boundaries should be undertaken rather than default to the settlement boundary.

4.0 Required Change:
4.1 That the site at The Griffin be removed from the Tredegar Park Special Landscape Area.

12 Speaking at Public Examination

Item Question

Council Response

No change. The designation of Special Landscape Areas was assessed using the Landmap information system, as referenced in PPW, which is the data set used in the overall assessment undertaken using the Special Landscape Area Designation Criteria included within Natural Resources Wales' guidance. The Local Authority did refine the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken; this included roads, hedgerow as well as settlement boundaries. This work looked at the proposed SLAs identified by the assessment of the Landmap data and did not seek to amend this nationally consistent data set. The area at The Griffin is allocated as part of the SLA 2 West of Rhiwderin and this is based on the overall value of the landscape taking into account its qualities and features which have been deemed worthy of designation.
### Representation Details

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**Document:** Revised LDP, p.65  
**Policy:** H01  
**Summary:** Land at The Griffin, Bassaleg should be allocated for 88 dwellings.

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1.0 Introduction
1.1 Mrs H E Murray objects to the omission of the land at The Griffin, Bassaleg as a residential allocation from within Policy H1. The land concerned is shown on the attached plan.

1.2 Omission of this land from the housing allocations results in the Deposit Local Development Plan being unsound in terms of the following tests:
   - C2 in that the housing allocations are not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales;
   - CE2 in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base in terms of future housing needs; and
   - CE4 in that omitting the site from the housing allocations does not provide a reasonable level of flexibility to allow the Deposit Plan to deal with a higher housing requirement to meet local needs.

2.0 Site Description
2.1 The broadly rectangular shaped 7.73ha site is situated immediately adjoining the settlement boundary for Bassaleg with Bassaleg Secondary School forming the northern boundary. The western boundary is defined by The Griffin whilst the eastern boundary is defined by Court Woodland. To the south is a single residential dwelling (Ffynon Goger).

2.2 The site consists of a small number of fields comprising of pastoral farmland intersected by hedge rows and rises in level from the western boundary, The Griffin, to the eastern boundary, Court Wood.

2.3 The facilities and amenities of Bassaleg, including a community centre, a newsagent, post office, dentist, Nisa local store, pharmacy, hairdresser, fish and chip shop and several public houses and restaurants are within close proximity. There are also recreation and employment opportunities (circa 1km) to the north and east of the site.

2.4 The site is also well served by a number of Bus stops located along the A468 Caerphilly Road providing links to both local areas as well as in inter urban bus service providing access to Newport, Caerphilly, Ystrad Mynach, Cardiff and Bargoed.

3.0 Compliance with Deposit LDP
3.1 The acceptability of the site for inclusion within the housing allocations set out in Policy H1 and its compliance with the policy of the Deposit LDP are identified in separate submissions as briefly outlined below:

   Housing Requirement
3.2 As detailed within the separate submissions made in relation to Policy H1 - Housing Sites there is clear need to provide further residential allocations. It is noted that due to concerns over deliverability of some of the proposed allocated sites as well as the requirement to meet local needs as set out within the Local Housing Market Assessment the housing land supply is inadequate to meet the identified 10,350 dwellings.

3.3 Therefore, it is evident that appropriate new housing allocation sites will be required to provide land which is immediately available and within a sustainable location. In this case the site at The Griffin would actively assist in providing a deliverable housing site to address the identified shortfall.

   Settlement Boundary
3.4 As detailed within separate representations made on Policy SP5 - Countryside, it is wholly appropriate for the modest extension to the settlement boundary at Bassaleg. This extension will assist to accommodate additional housing development in order to provide a greater degree of flexibility within the plan to accommodate growth overall.

   Special Landscape Area
3.5 Within separate representations made in relation to Policy SP8 - Special Landscape Area it is recommended that the site be removed the Tredegar Park Special Landscape Area and that the boundaries be revised given the sites characteristics and suitability for development.

4.0 Development Framework Document
4.1 In considering the above policies and in order to assist with establishing the most appropriate sites for further residential development a supporting Development Framework Document has been prepared for the site at The Griffin.

4.2 The Development Framework Document incorporates the results of a broad ranging assessment of environmental and other matters. It outlines the proposed development concept which responds
5.0 Required Change
5.1 That the land The Griffin, Bassaleg is allocated for housing development within Policy H1 as a new site for 88 dwellings and 1.10ha of housing and leisure/educational development in order to meet the needs of the local community.

The response to comments made on Policy H1 Housing Provision can be viewed against representation 1666.L4.
**Representation Details**

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Document: Revised LDP, p.21
Policy: SP05
Summary: Remove The Griffin, Bassaleg from the Countryside designation.

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The Griffin, Bassaleg.
1.0 Introduction

1.1 Mrs H E Murray objects to the inclusion of land at The Griffin within the Countryside and the omission from within the settlement Boundary of Bassaleg. The land concerned is shown on the attached plan.

1.2 Omission of this land from the settlement boundary results in the Deposit Local Development Plan being unsound in terms of the following tests:

   - C2 in that the settlement boundary is not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales;
   - CE2 in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base in terms of future housing needs; and
   - CE4 in that the restrictive settlement boundary does not provide a reasonable level of flexibility to allow the plan to deal with future circumstances.

2.0 Amplification Housing Requirement

2.1 As detailed within the separate submission made in relation to Policy H1 - Housing Sites there is clear need to provide further residential allocations. It is noted that due to concerns over deliverability of some of the proposed allocated sites as well as the requirement to meet local needs as set out within the Local Housing Market Assessment the housing land supply is inadequate to meet the identified 10,350 dwellings.

2.2 Therefore, it is evident that appropriate new housing allocation site will be required to provide land which is immediately available and within a sustainable location. In this case the revision to the settlement boundary at Bassaleg to incorporate the site at The Griffin would actively assist in providing a deliverable housing site to address the identified shortfall.

Planning Policy Wales

2.3 In the context of the requirement for additional housing sites it is evident that there is a need to allow greater flexibility with the settlement boundary and seek to allocate further housing sites at appropriate locations.

2.4 As part of a sound Plan, Local Planning Authorities, in identifying sites to be allocated for housing should have regard to the principles of the search sequence as outlined within Paragraph 9.2.8 of Planning Policy Wales (2012 5th Ed). The paragraph outlines that Authorities should start with the reuse of previously developed land and buildings within settlements, then settlement extensions and then new development around settlements with good public transport links.

2.5 Given that a number of the existing allocated sites are on previously developed land are constrained the Authority should seek to allocate sites within logical settlement extensions as per the next stage within the search sequence.

2.6 In doing so regard should be had to paragraph 9.2.9 of PPW which provides relevant criteria which Local Planning Authorities should consider in deciding which sites to allocate housing.

2.7 The characteristics and location of the site at The Griffin accords with the relevant criteria in order to provide a sustainable settlement extension:

   - The site immediately adjoins the settlement boundary of Bassaleg and is subject to urban influences;
   - The extension of the settlement to provide residential development would be wholly compatible with the with neighbouring establishing land uses;
   - Development of the site is not constrained by physical or environmental issues;
   - The site is accessible to jobs, shops and services by modes other than the car, and
   - The site is located where the capacity of existing and potential infrastructure, including public transport, water and sewerage, other utilities and social infrastructure, are available.

2.8 The principles and criteria as set out in Planning Policy Wales have been taken into consideration with the preparation of a Development Framework Document.

3.0 Development Framework Document

3.1 In order to assist with establishing the most appropriate settlement extension sites a Development Framework Document to support the site at The Griffin as a housing allocation site and the consequent inclusion within the settlement boundary of Bassaleg has been prepared.

3.2 The Development Framework Document incorporates the results of a broad ranging assessment of environmental and other matters. It outlines the proposed development concept which responds...
to the assessments carried out and provides a masterplan to illustrate that the development of the site can contribute to meeting the housing need through the Development Plan period within the sustainable settlement location.

4.0 Required Change
4.1 That the site at The Griffin be removed from the Countryside and the settlement boundary for Bassaleg be amended to include land to the as shown on the attached plan.

Item Question Council Responses

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13 Council Response

No change. The site is allocated as countryside and is also identified as an area of high value in the LANDMAP assessment that formed the basis of the designated Special Landscape Areas – Tredegar Park.

The plan seeks to promote the reuse of brownfield sites in preference to extensive use of Greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities.

The forecast housing need has been assessed in the context of population and employment projections and current market realities. The plan allocates sufficient land to meet this requirement. It is considered that the sites allocated allow flexibility and a range and choice of types of housing. Additional housing allocations in a rural location cannot therefore be justified. Furthermore, the release of the representation site for housing would be contrary to the Council’s strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

A background paper ‘Delivery and Implementation’ has been produced to expand on the information supplied in Chapter 13 of the Deposit LDP. This sets out the proposed phasing, constraints and infrastructure requirements for each allocation. The Delivery of each site is considered here, setting out the justification for its continuation in the plan based on evidence from developers and landowners. Some of the large brownfield sites allocated within the previous Unitary Development Plan have started construction e.g. Glan Llyn with 4000 homes and employment uses on the site. The impact on development by the economic recession is to be considered and the plan takes a long term view across the entire plan period.

The LDP sets out a strategy for growth which allocates an adequate supply of land for residential and employment uses. The supply of this land is not concentrated in one area but across the City. It is recognised that growth in the east is significant but the west has not been overlooked with large brownfield sites allocated at Noventis, former Whitehead Works and Monmouthshire Bank Sidings. The review of village boundaries has clearly considered the need for expansion in these areas and following their assessment boundaries have been tightened and allocations resisted due to the unsuitability of sites proposed in these unsustainable locations.

It is therefore recommended that the site is not allocated for housing in the Local Development Plan and remain allocated as countryside.
## Representation Details

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**Document:** Revised LDP, p.65  
**Policy:** H01  
**Summary:** Housing supply is inadequate to meet the housing requirement - Land at The Griffin should be allocated for housing.

### Item Question | Representation Text | Yes/No
---|---------------------|--------
3 | New Policy         | Yes    
4 | A new paragraph or new text | Yes    
8 | Candidate Site Name | The Griffin, Bassaleg |
10 | Soundness Test     | No     

12/02/2014
1.0 Introduction

1.1 On behalf of Mrs H E Murray, we object to the approach taken by the Deposit LDP towards housing supply.

1.2 In the first instance, we welcome the Council's acceptance that the housing requirement must be considerably higher than envisaged in the previous Deposit version of the LDP. Indeed this represents a step change in the position at Newport and is important to the future economic and social well being of the City. This inevitably places a far greater emphasis on the delivery of sites for housing otherwise there will be far reaching implications for the City and its residents.

1.3 We are seriously concerned that whilst the requirement has significantly increased, the housing land supply has remained largely the same as within the earlier version of the LDP. Indeed, the strategy remains reliant upon dwellings being provided at sites that are subject to a range of constraints and have historically failed to deliver. PPW (9.2.3) is clear that "sites must be free, or readily freed, from planning, physical and ownership constraints, and economically feasible for development, so as to create and support sustainable communities where people want to live. There must be sufficient sites suitable for the full range of housing types."

1.4 We do not consider that the supply proposed complies with these fundamental requirements. Indeed, the failure of constrained sites to deliver would have significant consequences on the Local Area. Given that it is the Welsh Ministers main priority to deliver housing, it is our view that greater emphasis must be placed on ensuring a deliverable and implementable supply of land for housing rather than continued reliance upon sites that have remained undeveloped over successive plan periods.

1.5 Based on our consideration of the Plan in relation to National Policy requirements, it is our view that the proposed Focussed Changes made in relation to the above are contrary to the following tests of soundness:

- CE1 the proposed housing provision strategy and employment requirement does not flow logically from the proposed strategy of the plan and are not related to each other;
- CE2 in that the housing supply are not realistic and appropriate having considered the evidence;
- CE4 in that restricting the level of housing available during the plan period does not provide a reasonable level of flexibility to allow the Plan to deal with higher population, employment growth and household growth and to meet local needs.

2.0 Land Supply Analysis

It is our view that there are numerous and significant weaknesses within the housing land supply that go to the heart of the Plan and render it unsound, in summary these are:

Housing Land Supply

In the first instance we draw attention to the under provision of housing during the UDP period (c. 360 dwellings) and secondly to the shortfall to date (April 2011 to April 2012 - 24 months) in the LDP period. Just 12 years into the LDP period based on these matters there is already a cumulative under provision of over 1,100 dwellings. Absent a significant source of readily available land for development it is likely that this level of under provision will increase as the same sites are relied upon for the LDP.

2.3 Given that the housing requirement has significantly increased and there are no material changes to the land supply position. If the 2012 JHLAS were re-run in the basis of the LDP requirement, then the land supply would decrease to less than five years.

Sites subject to constraints

We note that there are a number of sites that are subject to constraints yet are relied upon by the LDP. Indeed, these sites are vital to the delivery of the LDP but have been in the JHLAS for considerable time with no sign of development, some are categorised as 3(i) due to constraints, some are apartments for which there is limited demand and others are simply not viable for development. In addition there are a number of sites which are subject to the signing of a section 106 agreement which has constrained delivery for some time. We do not believe that these sites can be relied upon in order to contribute towards the housing requirement.

2.5 The following sites are examples of the inherent problems within the supply:

Site 1
Adjacent to Mcready's 54
2.6 We have serious concerns over the ability of the Llanwern site to be developed at the level envisaged within the plan (i.e. contributing over 2,748 dwellings during the plan period). Indeed, historically, there have been numerous delays that have continually postponed development and it is plainly not contributing the level envisaged in the latest JHLAS.

2.7 Indeed, we believe that based on present evidence if the overestimation persists, then the site will deliver at least 1,000 dwellings fewer than the level envisaged. This represents a major threat to the soundness of the plan.

Range and Choice

2.8 We note that National Guidance contained within PPW (5th Edition) requires that LDPs to provide a range of and mix of house types in places where people want to live. The present strategy is predicated upon large brownfield sites in and around the city centre and to the east of the City. This fails to consider the smaller scale needs of existing communities around the city and the desire of local people to continue to live within existing communities rather than as part of larger brownfield regeneration schemes in less attractive parts of the City.

Sites subject to s106

2.9 We do not consider that those sites that are subject to s106 can be relied upon to contribute during the plan period.

Windfall Allowance

2.10 There is presently reliance upon a significant number of windfall sites being brought forward. We note however, that a significantly number of the constrained land supply within the various tables are themselves windfall sites that have remained and subsequently become allocated but undeveloped. Accordingly, we believe that caution must be exercised in the contribution that such sites will make.

Flexibility allowance
2.11 Given the fundamental problems with the land supply identified and shortfall that it will result in, it is of fundamental importance that a flexibility allowance is identified. Indeed, in its present form the strategy lacks any flexibility to deal with the large number of constrained sites not being brought forward.

2.12 It is our view that in light of the significant problems identified, the contingency should be in line with the level of flexibility within the previous version of the LDP.

3.0 Consequences of failing to provide an adequate housing supply

3.1 As noted, the Strategy in its present form lacks any flexibility to deal with the failure of a small number of large sites to come forward. Given the known constraints and historic under-delivery, it is important that the sufficient housing is identified. Indeed, the consequences of the failure of the housing supply to meet requirements will be far reaching and undermine future aspirations for Newport.

3.2 Hardisty Jones Associates (HJA) have prepared an analysis on behalf of Mrs H E Murray on the consequences of the failure of the housing land supply to be realised. They have based their considerations on the Assessment of Housing Requirements report prepared by Nathaniel Licfield and Partners for Newport City Council.

3.3 Both the Newport Community Strategy and Local Housing Strategy set out an ambition to see Newport as a prosperous and thriving city. The Revised LDP has a vision of a lively, dynamic, growing City. The delivery of sufficient housing is central to achieving these visions in a sustainable manner, as set out within the LDP and the supporting NLP report (Assessment of Housing Requirements, February 2013, NLP). Indeed, the NLP report makes multiple references to the need to align housing and economic objectives in order to deliver and enable a sustainable and sound LDP, including:

* Alignment of housing and economic and policy objectives is essential to ensuring sustainable development and support for growth ……(alternative lower growth scenarios) …..fail to reflect the level of economic growth that is forecast and, as such, would compromise the deliverability of the economic vision for the area* [para 3.22, NLP].

* This consistency between employment and housing policies will be important in ensuring that the Plan can be found to be sound* [para 3.28, NLP].

*To achieve balanced and well-distributed growth economic polices must align with policies seeking the future development of houses in the area*. [para 4.10, NLP]

3.4 Plainly the failure to deliver sufficient housing within Newport over the LDP period has implications for economic, social and environmental sustainability.

**Economic Sustainability**

3.5 Firstly, there will be a reduction in the scale of economic and employment growth achieved in Newport over the LDP period if lower levels of housing than planned are delivered. Paragraphs 1.18 and 1.27 of the Revised LDP note there is a direct relationship between job creation in the construction sector and the building of houses. Without sufficient activity there will be an impact on the potential to achieve 7,400 jobs over the plan period.

3.6 Secondly, on a more general level, there is an important relationship between the provision of housing, the growth of the workforce and the attraction and achievement of economic growth. As NLP note:

*"….the delivery of sufficient housing for the (expanding) workforce represents an essential element in ensuring that economic growth can be attracted and sustained."*[para3.23, NLP]

3.7 Thirdly, and related to the second point above, there will be implications for the sustainable supply of labour without sufficient housing to attract and retain a population of working age. The NLP report highlighted the importance of positive net-migration to provide an appropriate demographic structure to support sustainable growth:

*Migration can be considerable benefit for the social and economic well-being of an area. It helps to ensure that the area benefits from a balanced mix of people of all age groups, including those of working age that are able to work within the local area. As suc, it can contribute towards a more balanced and economically functional society. It is important to acknowledge these benefits and to respond to them by making adequate provision for the future needs of migrants, including housing."*[para3.8, NLP]

*Taking account of the assumptions that have been made (and tested) regarding unemployment, economic activity and commuting, it is evident that if NCC is to deliver its growth aspirations then it will be essential to plan for and provide for net inward migration*. [para 3.9, NLP]

3.8 In order to secure the economic ambitions of the LDP and wider policy and strategy documents for Newport there is a need to deliver sufficient housing.
Social Sustainability

3.9 There are two important elements of social sustainability related to housing provision.

3.10 Firstly, a failure to provide sufficient housing will hinder the formation of new households and/or limit the housing choices available to new households. This can happen in a number of ways. Directly, insufficient housing limits the number of households that can be accommodated in the city. Indirectly, it can lead to increases in house prices as demand outstrips supply, limiting access to housing that is affordable. The implications will vary from case to case, but may force homebuyers to look further afield, away from friends and family and with commensurate implications on travel to work (see below), or may lead to households failing to form, for example, young people in their twenties and thirties continuing to reside within the parental home. All of these outcomes have social implications and restrict opportunities.

3.11 Secondly, a lower provision of housing will impact upon the level of affordable housing that can be delivered in the city over the plan period. The Newport Community Strategy sets out a need to deliver affordable housing as part of its vision to ensure opportunities for all. This is set against an historic backlog in terms of affordable housing delivery, with the NLP report indicating a "significant unmet housing need in Newport" [para 3.33 bullet 6, NLP].

Environmental Sustainability

3.12 Without an adequate locally resident workforce employers will be reliant upon commuters to fill vacancies. This will put pressure on transport infrastructure and, given the ongoing reliance on the private motor car, is likely to lead to less environmentally sustainable outcomes. The NLP report states that:

"...if the housing requirement was set to reflect the demographic scenarios alone, then there is a risk that the housing and employment elements of the LDP would not be joined up and the economic growth that is anticipated would be reliant upon a substantial increase in commuting into the area, it it was to be achieved. Such an approach would not be sustainable and would raise fundamental questions regarding the soundness of the resultant strategy."[para 4.9, NLP]

3.19 In conclusion therefore it is vital that housing and employment is aligned in policy, and that in addition, housing is delivered in order to enable the sustainable economic growth that is so necessary. Indeed, this similar conclusion is reached by NLP in its advice to the Council:

*Alignment of housing and the economy is therefore essential to ensuring sustainable development and support for growth.....the delivery of sufficient housing for the (expanding) workforce is essential to ensuring that economic growth can be attracted and sustained ...*[para 4.11, NLP]

4.0 Required Change

4.1 It is considered that to make the plan sound additional land will be required to be identified for housing. To that extent the land at The Griffin, Bassaleg is considered acceptable to accommodate some of the required shortfall. It is readily available, free from constraints and related to an existing sustainable community where people want to live.

4.2 The supporting Development Framework Document which has been prepared in relation to The Griffin has summarised the technical reports and information which has been prepared to support the allocation as a logical choice for housing for approximately 88 dwellings along with 1.1ha of leisure/educational development.

4.3 It is evident from the assessments undertaken as part of the Development Framework Document and the separate submissions made to the Deposit LDP in regards to Policy SP5 - Countryside, H1 - Housing Site (Allocation) and SP8 - Special Landscape Areas, that there are no overriding constraints to the development of the site. Furthermore given that the site is without contamination issues and large infrastructure requirements it is immediately available and would assist Newport in providing short term sites to provide for Newport's immediate housing needs as detailed above.

4.4 Taking this into consideration an appropriate masterplan has been prepared as part of the Development Framework Document to illustrate the development opportunities and benefits which can arise and to demonstrate that an allocation at The Griffin within the settlement of Bassaleg is deliverable. In this regard the allocation at The Griffin will assist in providing certainty over deliverability and housing supply within the plan period together with alternative range and choice.

5.0 Conclusion

5.1 In the first instance, we welcome the significant progress taken by Newport Council in recognising that there is a need to establish a significant housing requirement and the benefits that this can bring. However, we believe that the supply in inherently problematic and is not capable of delivering the level of housing required.
### Representation Details

**by:** (No grouping)

Filtered to show: (all of) Stage=L; Status=M

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5.2 The housing land supply is inadequate to meet the identified 10,350 dwellings. We have a number of significant concerns:

1. There is already a cumulative under provision of housing amounting to over 1,100 houses in the first 18 months of the LDP period and including the shortfall from the UDP;

2. The sites identified as being available during the plan period will not deliver the necessary completions. Many have been around for some considerable time and are subject to constraints that there is no indication can be overcome;

3. The estimation of delivery at Llanwern is significantly overstated when based on historic delays, constraints and progress to date;

4. An element of supply is subject to S106 agreements being signed. Given the already significant delays such sites cannot be robustly considered to be deliverable.

5. There is no flexibility allowance for non-implementation which is likely to be a significant problem.

5.3 It is considered that additional readily available housing sites will be required for development. As such, land at The Griffin should be allocated for development.

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12 12 Speaking at Public Examination Yes

Due to the significant issues raised in the attached representations.

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**Item Question**  Council Responses
Representation Details

13  Council Response

Support for the growth strategy noted.

Justification of Requirement

Following representations at the Deposit LDP stage the housing requirement figure has been justified and increased from the proposed Welsh Government Population projections. There is scope for an authority to deviate from the WG population projections but this deviation is required to be well evidenced. The NLP assessment sets out this evidence base and illustrates that Newport, as one of the few areas in Wales with an anticipated population increase noted in the Census, is set to grow and reflects the Council’s policy aspiration for growth. It should be recognised that the majority of the sites (46 of 55) have planning permission or permission subject to a Section 106 agreement. This established supply with clear market intent illustrates not only that a growth strategy is appropriate but achievable.

As noted above, the Plan identifies its housing requirement for the plan period based on an assessment of need and this is also true of its employment land requirements. The clear strategy for the Plan is for growth and it will be through the successful implementation of the policies of the Plan that this will be achieved. There is a clear link between housing supply and economic growth which is why the supply will be monitored annually.

Reliance on previous Development Plan sites

The Local Development Plan does have a number of housing sites which were identified within the Unitary Development Plan. In total there are 15 of the 55 housing sites which continue into the new plan. The majority of these sites have progressed significantly from the UDP, as noted below:

1. Land adj. McReadys. As of 1st April 2013 the developer is on site preparing the site for development.
2. Eastern Expansion Area. Planning permission has been granted with a signed Section 106 agreement. Gallagher Estates have confirmed through the JHLAS process that they will be delivering units on site in 2015.
3. Glebelands. This site has an extant planning permission associated with the school site adj to the residential area. The land has recently been sold to a developer.
4. Monmouthshire Bank Sidings. Redrow are on site and progressing.
5. Traston Lane. The site has planning permission and the agent has confirmed that they anticipate development on the site in 2015.
6. Pirelli. This site has been sold to the Seren Group (RSL) who launched the development in September 2013.
7. Ty Du Works. An application is being considered by the Council for a new scheme on the site.
8. Farmwood Close. This is an historic site with a LDC for the implementation of 10 units which have not been completed. The land is currently being marketed.
9. City Vision. The developer is on site and progressing.
10. Trinity View. The developer is on site and progressing.
11. Glan Llyn. The developer is on site and progressing. A third developer (St Modwen) are anticipating to begin work on Phase 2 in 2015.
12. Mill Street. The site is owned by NCC who will market the site.
13. Herbert Road. This site is adjacent to the Glebeland site noted above. The site is compliant with the overall strategy of the LDP being a brownfield urban site in need of regeneration. There is no application on the site but the area land owner notes their intention to sell the site for development.
14. Whitehead Works. This site is part of a Welsh Government regeneration scheme, which anticipates delivery to begin in 2016.
15. Bideford Road. This site is compliant with the overall strategy of the LDP being a brownfield urban site with potential for regeneration. There is no application on the site but the area is the remaining part of a housing estate development.

The information above clearly shows that although there are a number of sites which have continued from one development plan to the other they have in the main progressed significantly or that they will be delivered within the plan period. It is also important to note that it was made clear through the UDP process that the growth proposed in the east of the city (i.e. Glan Llyn and Llanwern Village) was not anticipated to be delivered wholly within the UDP plan period.

Delivery in the east

The development rate anticipated over the plan period for the large housing development at Glan Llyn, is based on an annual review through the Joint Housing Land Availability Study (JHLAS) as required by National Planning Policy. The rates are considered appropriate and have been jointly agreed with the JHLAS study group which includes the development industry.

The Plan sets out the anticipated rate of delivery in Chapter 13 which illustrates that the total number of units is set to be delivered across the plan period. This in turn is established yearly through the
Joint Housing Land Availability Study and monitored annually within the AMR. The effects of the economic recessions are still being felt within the housing market so it is therefore of no surprise that the plan anticipates a lower growth in the first period of the plan compared to the final ten years.

Deliverability and Supply
The Plan does however provide enough land to ensure that a 5 year supply is met and, that although the annual build rate is higher than currently achieved, even when taking into account the residual method of calculation the Council has provided an adequate supply of land which has been agreed with the industry through the JHLAS process. In terms of Residual need it should be noted that the assessment of residential need takes into account the period 2011-2026. This takes into account the need of that period which would include the backlog from pre 2011 the proposed figures would result in double counting. It should also be noted that the residual method of calculation for the housing land supply will only be required to take into account those units not completed from 2011 onwards e.g. any provision under the required 690 units pa. It is also useful to note that sites subject to the signing of a section 106 will not be considered within the calculation of the 5 year land supply as noted in TAN1. It is useful to note that such sites have been deemed appropriate for development by the Council having been permitted planning permission subject to a legal agreement, therefore they have been identified within the plan as sites which are compliant with the plans strategy and are considered to be deliverable within the plan period.

As illustrated above the perception that the Plan is overly reliant on sites inherited from the UDP period is not well founded. In addition a number of the sites outlined by the developer as being undeliverable are in fact progressing e.g. Alcan. Not all the sites noted are counted as part of the housing supply due to the lack of evidence of deliverability e.g. Newport Athletic Club. The Council has been realistic in its approach to the housing supply set out in the Plan which is based on the annual JHLAS process to ensure that the sites can be delivered to ensure the strategy is met.

The rate of windfall sites is also questioned and as noted in Planning Policy Wales there is a need to consider the supply from such sites. The LDP based its figures on a review of the past trend of windfall supply which has been drastically cut to reflect the need for the Plan to remain flexible whilst concentrating growth on allocated housing sites and tight settlement boundaries. The plan will be monitored as to the percentage of houses developed on allocated housing sites to ensure that the housing policies of the plan are being effectively implemented.

Range and Choice
The supply of housing is considered to provide for a clear range and choice of housing which is a clear concern for many representors. The housing sites within the Plan are located across the City, with a clear focus on regeneration in the east as per the established strategy. The Plan provides a supply of affordable units for a mixture of needs as well as providing a mix of family homes and inner city living to cater for the broad housing market. The opportunity to provide homes in more rural locations has been investigated and there was no clear evidence to justify expansion to existing settlements. The Plan therefore has provided the opportunity for exception sites where such justification can be produced.

Flexibility
As the representation notes there is no set flexibility figure required for housing supply within development plans. However, during the examination of the Brecon Beacons National Park LDP WG noted a notional figure of 10% but that needed to reflect local circumstances. Other authorities within South East Wales have a range of 12-20% flexibility. It is good practice to allow for unknowns and the need for flexibility within a development plan is inherent from National Planning Policy. In Newport’s case the majority of the housing supply has planning permission or is being progressed. Those remaining 9 sites without planning permission are in line with the overall strategy or regeneration needs of the plan. Together they provide a 12% oversupply which is considered appropriate to enable to plan to cope with uncertainties that may arise over the plan period.

Strategy compliance and delivery.
It is considered that the plan provides a more than adequate supply of housing, both market and affordable, which is both deliverable and viable. Many of the sites have progressed since the Revised Deposit Plan was written and there is a steady supply of housing being achieved across Newport. The Plan identifies its housing and employment land supply for the plan period based on an assessment of need. The clear strategy for the Plan is for growth and it will be through the successful implementation of the policies of the Plan that this will be achieved. There is a clear link between housing supply and economic growth which is why the supply will be monitored annually.

This site at The Griffin was assessed as a Candidate Site (candidate site ref 1666.C1) and the following conclusion was reached. This site is put forward in conjunction with the land immediately to the north, to form a larger allocation option (see also 1666.C2). The site was considered at the Unitary Development Plan Inquiry for inclusion in the plan as a residential allocation. In relation to the northern part of the land (1666.C2) the Inspector commented “the site is clearly part of the countryside on the outskirts of Pentrepoeth and for it to be developed as proposed it would be necessary to demonstrate a need for housing that outweighed the broad thrust of policies seeking to ensure the conservation and enhancement of the countryside” (para 3.80). With specific reference to this candidate site (ref 1666.C1 LDP) the Inspector notes that it is “predominantly open fields on the edge of the settlement and other than referring to a possible Bassaleg by pass – a scheme to which, in the absence of any assessment of need or feasibility, I attach little weight” (para 3.84).
The forecast housing need has been assessed in the context of population and employment projections and current market realities. The plan allocates sufficient land to meet this requirement. Additional housing allocations in a rural location cannot therefore be justified. Furthermore, the release of the representation site for housing would be contrary to the Council's strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council's strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

The plan seeks to promote the reuse of brownfield sites in preference to extensive use of greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities.

The site is also identified as an area of high value in the LANDMAP assessment that formed the basis of the designated Special Landscape Areas – West of Rhiwderin, which the site forms part of.

Notwithstanding the representation submitted in support of this alternative site, the Council maintains the position adopted at the Candidate Site stage and considers that the LDP is sound and relies on the evidence which supports it. In this respect, the Council does not support this Alternative Site.
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Document: Revised LDP, p.65

Policy: H01

Map: Proposals East: Proposals Plan - East

Summary: Proposed new site in Langstone to overcome short term need for housing

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CE1, CE2, CE4, C1, C2, C3
On behalf of my Clients, Messrs Duthie, Lewis and Neal, the owners of the land shown in the attached plan, I wish to point out that the Revised LDP is unsound and needs to be changed.

The first of the Assembly Government objectives for housing is:
"to provide more housing of the right type and offer more choice"
Furthermore, the Assembly Government will seek to ensure that:
"the overall result of new housing development in villages, towns or edge of settlement is a mix of affordable and market housing that retains, and, where possible enhances important landscape and wildlife features in the development."

As openly indicated in the Revised Deposit Plan, the supply of housing land is focussed on brownfield sites and includes many of the sites that were included in the previous UDP. Indeed, several of the sites have had permissions for many years and seem no nearer to development now. These appears to be a complacent attitude that more sites need to be allocated, even thought he end date for the Plan is 2026. Such a strategy is flawed because it provides insufficient choice, range and variety of sites with flexibility to deal with changing circumstances.

Also, National Government emphasises the need to make up the shortfall in affordable housing provision. The dependence on brownfield sites, where development costs are higher, is in danger of not producing the required affordable housing provision because of the threat to the viability of development.

While the Assembly Government encourages housing development on mainly brownfield sites within urban areas, it does not require housing allocations to be almost exclusively on such sites, accepting that some greenfield development is necessary to provide a balance of development opportunities reflecting choice, range and variety. The Revised Deposit Plan provides for housing sites to be concentrated within the urban boundaries of the City with few opportunities beyond the City Boundaries. In particular there are no new allocations within Langstone, even though the village has shown the capacity to absorb new development and has been provided with new employment opportunities during the past decade.

Paragraph or section number(s) Section 5.
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*Item Question  Council Responses*
Justification of Requirement
Following representations at the Deposit LDP stage the housing requirement figure has been justified and increased from the proposed Welsh Government Population projections. There is scope for an authority to deviate from the WG population projections but this deviation is required to be well evidenced. The NLP assessment sets out this evidence base and illustrates that Newport, as one of the few areas in Wales with an anticipated population increase noted in the Census, is set to grow and reflects the Council’s policy aspiration for growth. It should be recognised that the majority of the sites (46 of 55) have planning permission or permission subject to a Section 106 agreement. This established supply with clear market intent illustrates not only that a growth strategy is appropriate but achievable.

As noted above, the Plan identifies its housing requirement for the plan period based on an assessment of need and this is also true of its employment land requirements. The clear strategy for the Plan is for growth and it will be through the successful implementation of the policies of the Plan that this will be achieved. There is a clear link between housing supply and economic growth which is why the supply will be monitored annually.

Reliance on previous Development Plan sites
The Local Development Plan does have a number of housing sites which were identified within the Unitary Development Plan. In total there are 15 of the 55 housing sites which continue into the new plan. The majority of these sites have progressed significantly from the UDP, as noted below:

1. Land adj. McReadys. As of 1st April 2013 the developer is on site preparing the site for development.
2. Eastern Expansion Area. Planning permission has been granted with a signed Section 106 agreement. Gallagher Estates have confirmed through the JHLAS process that they will be delivering units on site in 2015.
3. Monmouthshire Bank Sidings. Redrow are on site and progressing.
4. Traston Lane. The site has planning permission and the agent has confirmed that they anticipate development on the site in 2015.
5. Pirelli. This site has been sold to the Seren Group (RSL) who launched the development in September 2013.
6. Ty Du Works. An application is being considered by the Council for a new scheme on the site.
7. Farmwood Close. This is an historic site with a LDC for the implementation of 10 units which have not been completed. The land is currently being marketed.
8. City Vision. The developer is on site and progressing.
9. Trinity View. The developer is on site and progressing.
10. Herbert Road. This site is adjacent to the Glebeland site noted above. The site is compliant with the overall strategy of the LDP being a brownfield urban site in need of regeneration. There is no application on the site but the area land owner notes their intention to sell the site for development.
11. Whitehead Works. This site is part of a Welsh Government regeneration scheme, which anticipates delivery to begin in 2016.

The information above clearly shows that although there are a number of sites which have continued from one development plan to the other they have in the main progressed significantly or that they will be delivered within the plan period. It is also important to note that it was made clear through the UDP process that the growth proposed in the east of the city (i.e. Glen Llyn and Llanwern Village) was not anticipated to be delivered wholly within the UDP plan period.

Affordable Housing
It is recognised that the required level of affordable housing for Newport cannot be met by the Plan alone. The level of supply which can be achieved through the implementation of the affordable housing policy in addition to those units already secured through the planning process has been clearly set out. It is not the sole responsibility of the planning system to meet the affordable housing requirement however the Plan does set a policy framework in order to achieve the highest level of affordable housing provision possible. Such provision has taken into account the viability of the policy threshold for affordable housing yet remains flexible to ensure that viability can be considered so that the housing market is not stifled by a non-negotiable approach to affordable housing provision.

Over reliance on previously developed sites
Planning Policy Wales sets out the overarching requirement for development to be placed on brownfield sites in preference to greenfield sites. The plan allocates 82% housing units on brownfield sites with the remaining 18% of units on greenfield sites (these calculations excludes the completions, windfall and small sites supply figures). The LDP is therefore compliant with Planning Policy Wales in terms that it has followed the search sequence criteria starting with the re-use of previously developed land and buildings within settlements which are located in areas accessible to jobs and services, where there is existing infrastructure and the scope to build sustainable communities.

Sites beyond the settlement boundary
As part of the development of the LDP sites were suggested for inclusion across Newport. Those applications have been assessed individually and the result of this assessment can be viewed in the Alternative Sites Assessment Report 2013. In addition to this work a review of boundaries, including Langstone, was undertaken the full details of which can be viewed in the Settlement boundary methodology background paper 2013.

Housing Land Supply
Based on a housing supply of 11,622 units over the LDP plan period the Council anticipate the following delivery rate:

- Completions to date (Oct 2012) = 5%
- Remaining completions between 2011 - 2015 = 25%
- Completions between 2016 – 2020 = 38%
- Completions between 2021 – 2026 = 19%
- Remaining 13% left to small site and windfall completions.

The plan sets out the anticipated rate of delivery in Chapter 13 which illustrates that the total number of units is set to be delivered across the plan period. This in turn is established yearly through the Joint Housing Land Availability Study and monitored annually within the AMR. The effects of the economic recessions are still being felt within the housing market so it is therefore of no surprise that the plan anticipates a lower growth in the first period of the plan compared to the final ten years.

It is considered by the Council that the Plan provides enough land that is both deliverable and viable which ensures a 5 year supply is met and, that although the annual build rate is higher than currently achieved, even when taking into account the residual method of calculation there is an adequate supply of land which has been agreed with the industry through the JHLAS process. Many of the sites have progressed since the Revised Deposit Plan was written and deliver rates will need to be taken from the most up to date JHLAS study process.

The annual monitoring process will consider the implementation of the policies within the Plan, including the delivery of housing allocations, including the overprovision of housing. The Plan sets out a supply based on a robust evidence base which reflects the key strategy for Newport of regeneration on brownfield sites. This prioritisation of the sustainable use of land will be undermined with the increased allocation of greenfield sites.

The site, land at Magor Road, is located adjacent the urban boundary and partially within C2 Flood Zone. Residential development in such locations should be resisted in accordance with TAN 15.

The plan seeks to promote the reuse of Brownfield sites in preference to extensive use of Greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities.

The forecast housing need has been assessed in the context of population and employment projections and current market realities. The Plan allocates more than sufficient land to meet this requirement. Additional housing allocations in a rural location cannot therefore be justified. Furthermore, the release of the representation site for housing would be contrary to the Council’s strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

It is recommended that this site is not included in the Local Development Plan for development.
Paragraph 6.27 continues to make reference to safeguarding the M4 relief road route which could run through the Docks. This route however no longer features in the Welsh Government's (WG) published major infrastructure plans for the next 10 years and it is also noted that the potential route has not been included on the LDP Proposals Map (although it is on the LDP Constraints Plan). The LDP notes that the relief road is only one option (of four) for overcoming the issues on the M4 and recognises that the Docks is an important for B1, B2 and B8 (as well as for energy and infrastructure uses). Furthermore, the LDP recognises that the potential line of the relief road that was shown in the UDP and is now shown on the LDP Constraints Plan is through the central part of the Docks whereas the most recent WG consultation on the options (M4 CEM March 2012) shows a potential route through the northern part of the Docks. The M4 CEM document (page 30) states that the options shown within it are outside current commitments in the prioritised National Transport Plan and that the cost of the new road at £830m would be £280m more than the next cheapest option. As such it is considered that there is too much uncertainty in both whether the new road will be taken forward and what the potential route will be if it is. If the route of the road should be deleted from the LDP Constraints Plan.

Speaking at Public Examination

To allow detailed discussion of the relevant issues and to ensure the inspector can be made fully aware of the circumstances in order to avoid misunderstandings.

The route of the M4 relief road will be safeguarded in the LDP as the Welsh Government Direction is still in place.
### Representation Details

**Document:** Revised LDP, p.83  
**Policy:** EM03  
**Summary:** Add energy and infrastructure uses to policy EM3.

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<td>10 10</td>
<td>Soundness Test C1, CE1, CE2.</td>
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<td>11</td>
<td>We note that land under AB Ports ownership at Newport Docks is allocated for employment (B1, B2 and B8) uses under Policy EM3. Support is given to the Docks allocation for employment and the fact that the Council recognises the economic importance of the Docks in the LDP and seeks to support AMP to improve and expand its facilities in order that it can further contribute to the economic well being of the City. It should be noted that in addition to the role the Docks play in bulk handling and warehousing and storage facilities, ABP are also actively looking to develop energy and infrastructure projects within its landholdings in support of the objectives and targets outlined in the Climate Change Strategy for Wales. For the avoidance of doubt, therefore, we consider that the following text should be added to the end of Policy EM3 ‘...and for energy and infrastructure uses.’</td>
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<td>Soundness of LDP No</td>
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### Council Responses

Policy EM3 notes that the Council will support development of B1, B2 or B8 Use Class where it can be demonstrated that the development is complementary and does not hinder the operation use of the port or other local or national policies controlling the demand or need for operation port land. It is considered that these words provide sufficient guidance and support for possible dock related development.
### Representation Details

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**Document:** Revised LDP, p.60

**Policy:** CE10

**Summary:** Earlier objections to the Deposit Plan have been addressed.

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<td>I confirm that the concerns/comments I made at the Deposit LDP (April 2012) stage have been dealt with in the Revised Deposit LDP (June 2013). The above relates to 2035.D3/CE18 - Developed Coastal Zone Boundary on Proposals Map only.</td>
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<td>13 Council Response</td>
<td>Comments noted.</td>
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Support is given to Policy T1(v) and the Council's recognition of the need to protect and encourage rail access to industrial development at Newport Docks.

Support noted.
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<th>Document: Revised LDP, p.36</th>
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**Policy: SP22**

Summary: Other dock related freight should be reflected in the wording of the policy.

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**Soundness Test**

Land under AB Ports ownership at Newport Docks is a long established operation and a very significant economic and commercial asset to the City providing a wide variety of port related facilities and jobs.

It is noted that Policy SP22 (criterion ii) and Policy M4 (paragraphs 10.13 and 10.14) which relate to minerals both outline that wharves and existing rail infrastructure at Newport Docks should be protected to ensure the continued sustainable transportation of aggregate.

Whilst support is given to these policies, it should be noted that in addition to the role the Docks play in the transportation of aggregates, it also transports a large variety of other products and materials. It is therefore suggested that the following wording is added to the end of Policy SP22 (criterion ii) "... and other dock related freight in accordance with the requirements of Policy T1..." and the same text is added at the end of the first sentence of paragraph 10.13 and at the end of paragraph 10.14.

**Speaking at Public Examination**

To allow detailed discussion of the relevant issues and to ensure the Inspector can be made fully aware of the circumstances in order to avoid misunderstandings.

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**Council Response**

It is appreciated that the port play a wider role in the transportation of goods for Newport, however the policy concerns minerals and as such the wider role of the port is left to the transportation section of the Plan.
**Document: Revised LDP, p.33**

**Policy: SP18**

**Summary:** Reference should be made to support to energy and infrastructure uses in the Docks.

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We note that land under AB Ports ownership at Newport Docks is allocated for employment (B1, B2 and B8) uses. Support is provided to Policy SP18 'Employment Sites' and in particular supporting paragraph 2.66 which states that "Newport Docks provide a particular opportunity to provide for port related employment. One aspect of this is in energy generation, where it has locational advantages, including accessibility for fuel and distance from residential or other uses upon which there might be impact. The existing Uskmouth Power Station is of course just across the river".

Newport Docks are a long established operation and is a very significant economic and commercial asset to the City providing a wide variety of port related facilities and jobs. Support is therefore given to this statement and that the Council recognises the economic importance of the Docks in the LDP and will support ABP to improve and in addition to the role the Docks play in bulk handling and warehousing and storage facilities, ABP are also actively looking to develop energy and infrastructure projects within its landholdings in support of the objectives and targets outlined on the Climate Change Strategy for Wales.

It is therefore suggested that the following wording is added to paragraph 2.66: "...support is therefore given to the associated development of energy and infrastructure projects that are compatible with Dock operations and associated land uses".

To allow detailed discussion of the relevant issues and to ensure the Inspector can be made fully aware of the circumstances in order to avoid misunderstandings.

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Policy EM3 notes that the Council will support development of B1,B2 or B8 Use Class where it can be demonstrated that the development is complementary and does not hinder the operational use of the port or other local or national policies controlling the demand or need for operation port land. These use classes would include energy and infrastructure projects. It is considered that these words provide sufficient guidance and support for possible dock related development.
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<td>AB Ports supports the allocation of employment land under Policy SP17 that exceeds the minimum requirement. In particular this is because Newport should fully recognise that it benefits in a industrial, commercial and business sense by having the Port, which is a major infrastructure advantage. As such AB Ports feel that it is important that there are sufficient industrial and employment opportunities identified not only in the Port but in the surrounding area and the hinterland. The Port provides a unique and valuable service to existing employment and industry development in the City and surrounding area.</td>
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<td>Speaking at Public Examination To allow detailed discussion of the relevant issues and to ensure the Inspector can be made fully aware of the circumstances in order to avoid misunderstandings.</td>
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**Document:** Revised LDP, p.32  
**Policy:** SP17  
**Summary:** Support level of employment land allocated and reference to the Docks.  

**Representation Details**  
**Agent:** RPS Group PLC  
**Accession No:** 2035.L7//SP17  
**Date Lodged:** 26/07/2013  
**Source:** E  
**Type:** S  
**Mode:** I  
**Status:** M  
**Status Modified:**
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**by:** (No grouping)

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**Document:** Revised LDP, p.6  
**Policy:** Intro & Overview  
**Summary:** No comments to make on the Revised Deposit LDP.

**Item Question**  Representation Text

11 11 Representation

Thank you for consulting The Coal Authority on the above.

Having reviewed your document, I can confirm that we have no specific comments to make on this document at this stage.

We look forward to continuing to receive your emerging planning policy related documents; preferably in an electronic format. For your information, we can receive documents via our generic email address planningconsultation@coal.gov.uk, on a CD/DVD, or a simple hyperlink which is emailed to our generic email address and links to the document on your website.

**Item Question**  Council Responses

13 13 Council Response  

Noted.

### 2044.L1//H16.01

**Ward, Mr and Mrs P**  

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**Document:** Revised LDP, p.76  
**Policy:** H16.01  
**Summary:** Support proposed Gypsy site at Hartridge Farm Road.

**Item Question**  Representation Text

11 11 Representation

I agree with the LDP Revised Deposit Plan June 2013 and feel particularly strongly that the proposed Gypsy site at Hartridge is the correct decision. The site is very large, which would enable all the Gypsy families to stay together and offers the privacy they require whilst still being very near to all amenities. As this proposed site is not on a flood plain or flood area, this alleviates the problems that some previously proposed sites would have.

**Item Question**  Council Responses

13 13 Council Response  

Comments noted.
### Representation Details

**by:** (No grouping)

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**Document:** Revised LDP, p.102  
**Policy:** R12

**Summary:** 28 East Retail Park should be denoted on the proposals plan as a District Centre/established retail site.

**Item Question**  
**Representation Text**

1. A new paragraph or new text  
2. Yes

6. Amend the boundaries of an existing site

10. C2, CE2, CE3, CE4

11. REPRESENTATIONS ON BEHALF OF AXA REAL ESTATE  
**NEWPORT LOCAL DEVELOPMENT PLAN 2011-2026 CONSULTATION**  
**REVISED DEPOSIT REPRESENTATION FROM ADDITIONAL SHEET**  
**PART 4:**

Please state your representation, including how you would like to see the Plan changed with your reasons:

We consider that 28 East Retail Park, owned and managed by Axa Real Estate, should be allocated as a District Centre or a defined retail site, on the basis that it is an established retail park, which has contributed to the local economy, and is suitably located to serve the local need and the Eastern expansion area.

Notwithstanding this, the draft Local Plan does not allocate 28 East Retail Park, and therefore, Policy R12 will be the relevant policy for alterations to, redevelopment of, the existing retail park. In these terms, we comment on the policy as follows. We consider that the way in which this policy is worded is ambiguous and would unreasonably require the criteria of the policy to be satisfied for any proposals, regardless of their scale and nature, or whether they require planning permission.

Whilst the supporting paragraph 8.42 recognises retailers’ desire to improve the appearance and functioning of their premises, it is considered that the draft policy is not sufficiently flexible to meet the changing needs of retailers. Improvement and modernisation of existing retail outlets through refurbishment or internal and external alterations are essential to retail park operators, in order to ensure that the premises are modernised and capable of meeting retailer requirements. For established retail sites such as 28 East Retail Park, planning policy should not place unnecessary barriers to appropriate modernisation and innovation to take place, in order to ensure that they continue to contribute to the local economy. In these terms, we consider that the policy as currently drafted is unsound, and should be amended to ensure that the relevant tests would only apply to proposals which require planning permission, and are appropriate to the scale and nature of the proposals. We therefore suggest that the policy is amended as follows:

“Outside the City Centre and District Centres, and where planning permission is required, retail proposals, which would either increase the floorspace or vary of the range of goods, will only be permitted provided that…” Similarly, the second sentence of the supporting paragraph 8.42 should be amended as follows: “This Policy will also apply to internal alterations, where they require planning permission.”

In terms of the criteria of the policy, we consider that criterion iv is ambiguous and cannot effectively be applied to out of centre retail sites, which are not defined on the Proposals Map. In these terms, in order for this criterion to be sound, existing out of centre retail sites such as 28 East Retail Park, should be identified on the Proposals Map as an existing retail site. Alternatively, this criterion should be omitted.

12. Speaking at Public Examination

We wish to speak at the examination if the comments in this representation are not incorporated in the local plan before it is submitted to the inspectorate. This is to ensure that our justifications to the suggested changes to the relevant policy can be explained clearly to the inspector.
### Representation Details

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### Item Question  Council Responses

The preparation of the Local Development Plan (LDP) is an appropriate time to review boundaries defined in the Plan. Accordingly a review of all district centres allocated in the Adopted Unitary Development Plan has been undertaken for the preparation of the LDP. The Plan contains a sufficient number of District Centres, and there is no identifiable need to add 28 East Retail Park to the list, especially as parts of it have remained vacant since its construction in 2001. The proposed allocation will not be included in the Plan.
As per the previous LDP consultation, the following representation is made in relation to the site at Parc Seymour. The site was originally submitted as a candidate site ref: CS2049.C1. The site comprises agricultural land (0.98 ha) which lies immediately adjacent to the southern edge of the built-up edge area of Parc Seymour village. The Revised Deposit Plan does not allocate the site for a particular use or include it within the settlement limits.

It is recognised that the Revised Deposit Plan's main strategy seeks to promote brownfield sites in preference of greenfield sites as they perform better in sustainability terms for a variety of reasons. This includes the protection of the countryside; reduce the need to travel in particular by car; and to make best of the existing infrastructure. A brownfield only strategy is not however supported. To comply with national policy the Council should seek to allocate some greenfield sites in order to provide a range and choice of housing in appropriate locations where people wish to live across the administrative area of Newport. The Councils strategy should therefore, also support the sustainable expansion of some villages. Sites should simply not be dismissed as inappropriate simply because they are greenfield. Such sites should be considered on their merits to achieve the principle of housing choice as advanced in the policy guidance set out by the Welsh Government in Chapter 9: Housing of Planning Policy Wales (PPW, Edition 4 February 2011). It is considered that the land south of Meadowlands Close at Parc Seymour is an appropriate and suitable greenfield site to be a sustainable expansion of the village. Considerable concentration of housing has been allocated at the Eastern Expansion Area. However, we would submit that smaller scale peripheral extensions on appropriate sites in villages should also be supported. Such sites can contribute to life and economy of the village without undue detrimental impact and ensure that the range of facilities, services to support the community remain viable. The Candidate Site at Parc Seymour is ideal for a housing allocation. The site will be natural extension to Parc Seymour as it is located immediately adjacent to the existing settlement boundary. The site has good access where the main access can be achieved via Meadowlands Close. Development at this site will provide a choice of housing in a rural location. Notwithstanding the above, in terms of its impact on the rural location, the western half of the candidate site is well screened with existing vegetation (see attach plan ref: JCD2039:01 Site Location) and the site sits lower than the A48 and existing properties within the immediate vicinity, therefore it will not have a visual intrusion on the existing countryside.

Planning & Development –
In terms of accessibility the site is located near the A48 which has good connections to the City Centre and other areas to the M4. As far as public transport is concerned bus stops are located in Greenmeadow Drive and another on the A48. Overall, it is considered that Candidate Site CS2049.C1 should be allocated under Policy H1 of the LOP. The Development Boundary as defined on Inset Plan 14 should also be amended to include the site within the defined settlement limits of Parc Seymour. As such the Deposit LOP should be altered on the basis of this representation.
Planning Policy Wales sets out the overarching requirement for development to be placed on brownfield sites in preference to greenfield sites. The plan allocates 82% housing units on brownfield sites with the remaining 18% of units on greenfield sites (these calculations excludes the completions, windfall and small sites supply figures). The LDP is therefore compliant with Planning Policy Wales in terms that it has followed the search sequence criteria starting with the re-use of previously developed land and buildings within settlements which are located in areas accessible to jobs and services, where there is existing infrastructure and the scope to build sustainable communities.

The supply of housing is considered to provide for a clear range and choice of housing. The housing sites within the Plan are located across the City, with a clear focus on regeneration in the east as per the established strategy. The Plan provides a supply of affordable units for a mixture of needs as well as providing a mix of family homes and inner city living to cater for the broad housing market. The opportunity to provide homes in more rural locations has been investigated and there was no clear evidence to justify expansion to existing settlements. The Plan therefore has provided the opportunity for exception sites where such justification can be produced.

Over the plan period 57% of residential allocation will be located in the east as defined in the strategy paper, 27% will be located in the central area, and 16% in the west. The largest proportion of residential development is proposed in the eastern area, with Glan Llyn and Llanwern Village accounting for a large proportion of this. The Unitary Development Plan sought to concentrate development on brownfield land in the eastern area of the city. The continued concentration of the majority of residential development in this area is a legacy of the aspiration of the Unitary Development Plan and a reflection of the brownfield led strategy of the Local Development Plan.

The amount of development in the central area is a reflection of the ongoing regeneration of the central area of Newport. Newport Unlimited Urban Regeneration Company prepared a Central Area Master Plan (originally produced in 2003/04 and refreshed in 2010/11) which sets out the proposals for the regeneration of the central Newport area. The concentration of residential development is a legacy of this plan, and a reflection of the brownfield led strategy of the Local Development Plan.

The smaller percentage of residential development in the western area is a reflection of the character of the area which includes fewer brownfield sites. However there are a number of sites proposed in the area the biggest of which is the former Alcan aluminium factory site.

There is a spread of sites throughout Newport which provide a range of choice of house types and locations. In proposing that new homes should be predominantly developed in the core urban area with a good level of service provision, the Council’s approach follows guidance in PPW. In the case of large brownfield sites, such as Glan Llyn, the amount of housing proposed will serve to drive demand for local services, shops and facilities.

The proposed site is located outside the settlement boundary of Parc Seymour.

The plan seeks to promote the reuse of Brownfield sites in preference to extensive use of Greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities.

The forecast housing need has been assessed in the context of population and employment projections and current market realities. The plan allocates more than sufficient land to meet this requirement. Additional housing allocations in a rural location cannot therefore be justified. Furthermore, the release of the site for housing would be contrary to the Council’s strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

It is recommended that this site is not included in the Local Development Plan for development.
As per the previous LDP consultation, we make the following comments.

It is recognised that the Deposit Plan's main strategy seeks to promote brownfield sites in preference to greenfield sites as the Council's strategy considers them to perform better in sustainability terms for a variety of reasons. A brownfield only strategy is not however supported. To comply with national policy the Council should seek to allocate some greenfield sites in order to provide a range and choice of housing in appropriate locations where people wish to live across the administrative area of Newport. It is our view that brownfield sites are generally less capable of providing the range and choice of housing that a successful and growing economy associated with a major city will demand. Whilst brownfield sites can be developed at varying densities the likelihood of them being situated in an attractive location for families and the middle or upper end of the market is critical if housing provision is to match economic ambition. Brownfield sites are also expensive to develop and with greater commercial risk. Furthermore, the move towards more sustainable and zero carbon buildings and all new dwellings having to meet Code for Sustainable Homes Level 3 and obtain credits under Issue Ev Ene 1 - Dwelling Emission Rate from 1st September 2009 for 5 or more dwellings (1st September 2010 for 1 or more dwellings) as outlined in Technical advice Note 22: Sustainable Buildings, will increase development costs on brownfield sites further and make schemes even more difficult to implement. Accordingly, brownfield sites ability to make significant financial contribution to wider strategic aims/infrastructure requirements and may also harm the delivery of affordable housing. For these reasons we consider the Deposit LDP to be contrary to Test of Soundness CE2.

We also believe there is insufficient flexibility in pursuing a brownfield strategy. The Deposit LDP is therefore considered to be contrary to CE4 test of soundness. In particular it is noted that the Council relies upon the strategic brownfield housing allocation at Planning & Development – Llanwern. This site represents nearly half the housing land supply and as such, if any unforeseen difficulties are experienced with this site, there is the potential for nearly half the housing land supply to be compromised, which will have implications to the delivery of the housing requirement figure. In light of this, we believe there needs to be increased flexibility.

It is therefore proposed that some greenfield sites need to be released to ensure viability of developments and the supply of range and choice of house types. As such, we believe additional land to be released in order to ensure a flexible land supply that can accommodate the housing requirement figure and deliver a range and choice of housing, including affordable housing. As such Policies SP1 (Sustainability), SP10 (Housing Requirement) and H1 (Housing Sites) should be amended to reflect the above. In support of the release of greenfield sites we propose that Candidate Site CS2049.C1 at Parc Seymour be allocated. Please see our other representation made as part of this consultation specifically addressing this site.
The Plan seeks to promote the reuse of brownfield sites in preference to extensive use of Greenfield sites, as this generally performs better in sustainability terms. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8. It should be noted, however, that there are greenfield sites allocated in the Plan, and it is not a brownfield only strategy.

The LDP sets out a strategy for growth which allocates an adequate supply of land for residential and employment uses. The supply of this land is not concentrated in one area but across the City. It is recognised that growth in the east is significant but the west has not been overlooked with large brownfield sites allocated at Novelis, Whitehead Works and Monmouthshire Bank Sidings.

The Delivery and Implementation Background Paper – June 2013 expands on information set out in Chapter 13 of the Revised Deposit LDP. This sets out the proposed phasing, constraints and infrastructure requirements for each allocation. The Delivery of each site is considered here, setting out the justification for its continuation in the Plan based on evidence from developers and landowners. Some of the large brownfield allocations have started construction e.g. Glan Llyn with 4,000 homes and employment uses.

The Plan is therefore considered to allocate a sufficient amount of housing land on a range of sites across the City. Additional housing releases on greenfield sites, in unsustainable locations are not considered necessary. Comments relating specifically to the suggested Parc Seymour site are dealt with under representation 2049.L1.
### Representation Details

**Document:** Revised LDP, p.24  
**Policy:** SP10  
**Summary:** Change Parc Seymour village boundary to include site.

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It is therefore proposed that some greenfield sites need to be released to ensure viability of developments and the supply of range and choice of house types. As such, we believe additional land to be released in order to ensure a flexible land supply and can accommodate the housing requirement figure and deliver a range and choice of housing, including affordable housing. As such Policies SP1 (Sustainability), SP10 (Housing Requirement) and H1 (Housing Sites) should be amended to reflect the above. In support of the release of greenfield sites we propose that Candidate Site CS2049.C1 at Parc Seymour be allocated. Please see our other representation made as part of this consultation specifically addressing this site.

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12/02/2014

Page 438 of 1581
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The planning system does recognise that sites have unique factors which will result in varied levels of costs. In addition to the abnormal costs associated with each site there are additional factors such as Building Regulations and Code for Sustainable Homes that increase the requirement to builders and therefore affect costs. Such factors are not in the control of the Local Planning Authority and are required by the conditions of the Welsh Government, who take into account the additional costs such new conditions require. Such costs are knowns and as such it is the planning systems role to ensure developments provide adequate levels of education, open space and affordable housing etc. Such costs should be taken into account at the land acquisition stage as much as possible. It is accepted that some sites will have additional costs that are not picked up through the BCIS method which may have an affect on lower value areas but which should not skew a reasonable approach based on a methodology which the house building industry recognise. The planning system has remained flexible in its approach allowing viability assessments to allow for such abnormal costs to be factored in so that the housing market can continue but it should not do so to the detriment of creating sustainable communities.

The regeneration site at the former Llanwern Steelworks is a key strategic site for the Newport LDP. The site is progressing and the anticipated rates of delivery have been agreed through the Joint Housing Land Availability Study which includes the house building industry, water and sewerage suppliers. The site has an overarching planning permission with detail agreed for phase 1 which is being implemented. The reserved matters for phase 2 is being considered by the Council. There will an additional developer on the site as of 2014 with the implementation of phase 2. The anticipated rate is set and the Plan recognises that it is good practice to allow for unknowns and the need for flexibility within a development plan is inherent from National Planning Policy. In Newport’s case the majority of the housing supply has planning permission or is being progressed. Those remaining 9 sites without planning permission are in line with the overall strategy or regeneration needs of the plan. Together they provide a 12% oversupply which is considered appropriate to enable to plan to cope with uncertainties that may arise over the plan period.

The proposed site is located outside the settlement boundary of Parc Seymour.

The plan seeks to promote the reuse of Brownfield sites in preference to extensive use of Greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities.

The forecast housing need has been assessed in the context of population and employment projections and current market realities. The plan allocates more than sufficient land to meet this requirement. Additional housing allocations in a rural location cannot therefore be justified. Furthermore, the release of the site for housing would be contrary to the Council’s strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

It is recommended that this site is not included in the Local Development Plan for development.
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It is considered that the plan provides a more than adequate supply of housing, both market and affordable, which is both deliverable and viable. Many of the sites have progressed since the Revised Deposit Plan was written and there is a steady supply of housing being achieved across Newport. The Plan identifies its housing and employment land supply for the plan period based on an assessment of need. The clear strategy for the Plan is for growth and it will be through the successful implementation of the policies of the Plan that this will be achieved. There is a clear link between housing supply and economic growth which is why the supply will be monitored annually.

The planning system does recognise that sites have unique factors which will result in varied levels of costs. In addition to the abnormal costs associated with each site there are additional factors such as Building Regulations and Code for Sustainable Homes that increase the requirement to builders and therefore affect costs. Such factors are not in the control of the Local Planning Authority and are required by the conditions of the Welsh Government, who take into account the additional costs such new conditions require. Such costs are knowns and as such it is the planning system’s role to ensure developments provide adequate levels of education, open space and affordable housing etc. Such costs should be taken into account at the land acquisition stage as much as possible. It is accepted that some sites will have additional costs that are not picked up through the BCIS method which may have an affect on lower value areas but which should not skew a reasonable approach based on a methodology which the house building industry recognise. The planning system has remained flexible in its approach allowing viability assessments to allow for such abnormal costs to be factored in so that the housing market can continue but it should not do so to the detriment of creating sustainable communities.

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Furthermore, the move towards more sustainable and zero carbon buildings and all new dwellings having to meet Code for Sustainable Homes Level 3 and obtain credits under Issue Ene 1 - Dwelling Emission Rate from 1st September 2009 for 5 or more dwellings (1st September 2010 for 1 or more dwellings) as outlined in Technical advice Note 22: Sustainable Buildings, will increase development costs on brownfield sites further and make schemes even more difficult to implement. Accordingly, brownfield sites ability to make significant financial contribution to wider strategic aims/infrastructure via S.106 Agreements is limited. Such a strategy therefore threatens to deny the Council the opportunity of relying upon the private sector developments to fund public sector infrastructure requirements and may also harm the delivery of affordable housing. For these reasons we consider the Deposit LDP to be contrary to Test of Soundness CE2.

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Planning Policy Wales sets out the overarching requirement for development to be placed on brownfield sites in preference to greenfield sites. The plan allocates 82% housing units on brownfield sites with the remaining 18% of units on greenfield sites (these calculations excludes the completions, windfall and small sites supply figures). The LDP is therefore compliant with Planning Policy Wales in terms that it has followed the search sequence criteria starting with the re-use of previously developed land and buildings within settlements which are located in areas accessible to jobs and services, where there is existing infrastructure and the scope to build sustainable communities.

Range and Choice
The supply of housing is considered to provide for a clear range and choice of housing which is a clear concern for many representors. The housing sites within the Plan are located across the City, with a clear focus on regeneration in the east as per the established strategy. The Plan provides a supply of affordable units for a mixture of needs as well as providing a mix of family homes and inner city living to cater for the broad housing market. The opportunity to provide homes in more rural locations has been investigated and there was no clear evidence to justify expansion to existing settlements. The Plan therefore has provided the opportunity for exception sites where such justification can be produced.

Viability
The planning system does recognise that sites have unique factors which will result in varied levels of costs. In addition to the abnormal costs associated with each site there are additional factors such as Building Regulations and Code for Sustainable Homes that increase the requirement to builders and therefore affect costs. Such factors are not in the control of the Local Planning Authority and are required by the conditions of the Welsh Government, who take into account the additional costs such new conditions require. Such costs are knowns and as such it is the planning systems role to ensure developments provide adequate levels of education, open space and affordable housing etc. Such costs should be taken into account at the land acquisition stage as much as possible. It is accepted that some sites will have additional costs that are not picked up through the BCIS method which may have an affect on lower value areas but which should not skew a reasonable approach based on a methodology which the house building industry recognise. The planning system has remained flexible in its approach allowing viability assessments to allow for such abnormal costs to be factored in so that the housing market can continue but it should not do so to the detriment of creating sustainable communities.

Delivery in the east
The development rate anticipated over the plan period for the large housing development at Glan Llyn, is based on an annual review through the Joint Housing Land Availability Study (JHLAS) as required by National Planning Policy. The rates are considered appropriate and have been jointly agreed with the JHLAS study group which includes the development industry.

The Plan sets out the anticipated rate of delivery in Chapter 13 which illustrates that the total number of units is set to be delivered across the plan period. This in turn is established yearly through the Joint Housing Land Availability Study and monitored annually within the AMR. The effects of the economic recessions are still being felt within the housing market so it is therefore of no surprise that the plan anticipates a lower growth in the first period of the plan compared to the final ten years.
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Document: Revised LDP, p.52
Policy: CE04
Map: Proposals East: Proposals Plan - East
Summary: Amend the environmental space allocated at Llanvaches Church.

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### Item Question

11  Representation

I spoke to Susan about the Amenity Areas in Llanvaches village when she and Daniel did a presentation here.

The Community Council is content with the Amenity Areas shown on Inset 13 of the LDP except that a small area that we originally submitted has not been carried forward to the plan. My understanding is that it was not omitted by deliberate debate and conclusion, and we should like to resubmit this area described as –

The parcel of land near to the church containing the Church Hall and its grounds plus a piece of open land adjacent to, and to the south off, the Church Hall wall bounded to the west by properties and to the south by a stone wall being the boundary of Willow Lodge. The parcel is illustrated on the attached map.

The open land has been an open access area for many years and has been maintained on a regular basis by residents of the houses in Church Lane. We can find no record of ownership. The Church Hall and its grounds were donated to the parish by Lord Tredegar and it is almost certain that this adjacent piece of land belonged to the Tredegar Estate.

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### Item Question

13  Council Response

Notwithstanding the Council’s response to the Candidate Site Stage, having reviewed the information it is considered that the extent of the Environmental Space allocated in the Revised Deposit Plan is appropriate. The land omitted is not considered to form part of the amenity area associated with the church grounds, with Church Lane and Rectory Road forming a natural boundary to the site. No changes are therefore proposed to the Revised Deposit Plan.
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Newport City Council Revised Local Development Plan: Deposit (June 2013)

Alternative Site Submission / Objection to the Plan

Land at Gelli Bach, Castleton

Please find enclosed, on behalf of and under instruction from Mr Mark Williams, representations to the Deposit LDP.

This submission:
• puts forward an Alternative Site Representations; and
• objects to selected policy provisions of the plan.

For each Alternative Site Representation, the following information is (as required) enclosed:
• completed, signed and dated Deposit Plan Response Forms;
• a Landscape Assessment;
• Sustainability Appraisal;
• Red line plan.

Furthermore, and as an Annex to this letter, a detailed case (providing a critique of the current provisions of the plan and suggested changes to its content) is included, in support of, and to make the case for the inclusion of the Alternative Sites; and suggested changes to the provisions of the Plan’s policies.

The Annex addresses the following issues, and is structured accordingly:

• Summary of the overall position adopted – as an executive summary of the case being made;
• Consideration of housing supply by the Plan, at the overall / plan-wide area;
• An Assessment of the Suitability of the Settlement for Development;
• An Assessment of the Suitability of Site for Development;
• A Summary of the Suitability of Sites for Development;
• Requested / recommended changes to the Plan.

Given the detailed nature of these representations our client would be happy to discuss any aspect of the submission made and credentials of the site when your Authority (and the appointed Inspector in turn) comes to evaluate matters. Appearance at the Public Examination in due course is also considered necessary and beneficial.

We respectfully urge, for the reasons given herein and in the associated submitted information / supporting material, to allocate the sites put forward.

We look forward to hearing from you in due course. In the meantime we hope and trust that all is in order with this submission. Please do not hesitate to contact us in the event that further information is required or considered beneficial.

Enc’s:
• Completed Deposit LDP Response Form
  o Representation Regarding Policy SP7 Green Wedges
  o Representation Regarding Policy SP8 Special Landscape Area
  o Representation Regarding Policy SP10 Residential Requirement
  o Representation Regarding Policy H1 Housing Supply
• Site Location Plan
### Sustainability Appraisal

**Assessment of Green Wedge / Special Landscape Designation**

The purpose of the green wedge and special landscape area is to prevent urban coalescence—however the ‘open’ nature of the green wedge would not be significantly altered by the development of this site. Although the site is located within the green wedge designation, in light of its positioning adjacent to the existing settlement and defensible boundaries, the land does not contribute substantially to the open nature of the green wedge.

In addition, the site is not afforded any further policy protection for nature conservation interests etc, over and above the green wedge and special landscape designations. As such, in light of the above, it is considered that the potential harm caused to the green wedge by the development of the site would potentially be minimal, and would potentially be outweighed by other considerations.

In summary an appropriate design of the proposed development scheme as well as sensitive landscaping would seek to minimise any potential negative impact on the countryside. In particular, existing mature planting / hedgerows which surround the site, could be maintained and / or supplemented to ensure a sensitive scheme, which maintains the village’s setting within the rural landscape. Likewise a sensitive form and design of the scheme, along with appropriate landscaping would seek to ensure that any important views into and out of the village and surrounding areas were protected and / or sensitively managed.

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**Speaking at Public Examination**

To relay the findings of the detailed work undertaken and to put forward the issues contained within these representations.

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**Council Response**

No change. In relation to the appropriateness of the site for inclusion in the Green Wedge allocation it is considered that the allocation is in accordance with the purpose of Green Wedge as set out in Planning Policy Wales. The area of land does serve to prevent the coalescence of two settlements (Newport and Cardiff), and assists in safeguarding the countryside from encroachment.

It is also considered that the allocation of this area is in accordance with Planning Policy Wales in that normal planning and development management policies cannot provide the necessary protection (a countryside designation would not have the same level of control over certain types of development for example extensions to houses). It is considered that only land that is strictly necessary to fulfil the purposes of the policy has been provided in the designation based on the purpose of Green Wedge as identified in PPW. In particular in this instance the openness of the land is considered important.

Piecemeal removal of parts of the Green Wedge within the boundary of Newport would serve to undermine the intention of the various Green Wedge designations in the area.
### Representation Details

*by: (No grouping)*

*Filtered to show: (all of) Stage=L; Status=M*

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**Document:** Revised LDP, p.22  
**Policy:** SP08  
**Summary:** Amend SLA to exclude site.

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| Representation   | Newport City Council Revised Local Development Plan: Deposit (June 2013) Alternative Site Submission / Objection to the Plan  
Land at Gelli Bach, Castleton  
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This submission:  
• puts forward an Alternative Site Representations; and  
• objects to selected policy provisions of the plan.  
For each Alternative Site Representation, the following information is (as required) enclosed:  
• completed, signed and dated Deposit Plan Response Forms;  
• a Landscape Assessment;  
• Sustainability Appraisal;  
• Red line plan.  
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• Summary of the overall position adopted – as an executive summary of the case being made;  
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No change. The designation of Special Landscape Areas was assessed using the Landmap information system, as referenced in PPW, which is the data set used in the overall assessment undertaken using the Special Landscape Area Designation Criteria included within Countryside Council for Wales’ guidance. The Local Authority did refine the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. This work looked at the proposed SLAs identified by the assessment of the Landmap data and did not seek to amend this nationally consistent data set. The area at Gelli Bach (whole site) is allocated as part of the SLA3 Wentlooge Levels and this is based on the overall value of the landscape taking into account its qualities and features which have been deemed worthy of designation. The designation is not designed to preclude development but to ensure that it is designed to respect the valued characteristics of the recognised landscape.
**Representations Details**

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Document: Revised LDP, p.24
Policy: SP10
Summary: Include site for residential development at Gelli Bach, Castleton.

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Newport City Council Revised Local Development Plan: Deposit (June 2013)

Alternative Site Submission / Objection to the Plan

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Kind regards

Enc’s:
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- Representation Regarding Policy SP8 Special Landscape Area
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### Representation Details

**by:** (No grouping)

**Filtered to show:** (all of) Stage=L; Status=M

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12/12 Speaking at Public Examination

Yes

To relay the findings of the detailed work undertaken and to put forward the issues contained within these representations.

**Item Question**

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**Item Question** Council Responses

12/02/2014
Justification of Requirement
Following representations at the Deposit LDP stage the housing requirement figure has been justified and increased from the proposed Welsh Government Population projections. There is scope for an authority to deviate from the WG population projections but this deviation is required to be well evidenced. The NLP assessment sets out this evidence base and illustrates that Newport, as one of the few areas in Wales with an anticipated population increase noted in the Census, is set to grow and reflects the Council’s policy aspiration for growth. It should be recognised that the majority of the sites (46 of 55) have planning permission or permission subject to a Section 106 agreement. This established supply with clear market intent illustrates not only that a growth strategy is appropriate but achievable.

As noted above, the Plan identifies its housing requirement for the plan period based on an assessment of need and this is also true of its employment land requirements. The clear strategy for the Plan is for growth and it will be through the successful implementation of the policies of the Plan that this will be achieved. There is a clear link between housing supply and economic growth which is why the supply will be monitored annually.

Reliance on previous Development Plan sites
The Local Development Plan does have a number of housing sites which were identified within the Unitary Development Plan. In total there are 15 of the 55 housing sites which continue into the new plan. The majority of these sites have progressed significantly from the UDP, as noted below:

1. Land adj. McReadys. As of 1st April 2013 the developer is on site preparing the site for development.
2. Eastern Expansion Area. Planning permission has been granted with a signed Section 106 agreement. Gallagher Estates have confirmed through the JHLAS process that they will be delivering units on site in 2015.
3. Glebelands. This site has an extant planning permission associated with the school site adjacent to the residential area. The land has recently been sold to a developer.
4. Monmouthshire Bank Sidings. Redrow are on site and progressing.
5. Traston Lane. The site has planning permission and the agent has confirmed that they anticipate development on the site in 2015.
6. Pirelli. This site has been sold to the Seren Group (RSL) who launched the development in September 2013.
7. Ty Du Works. An application is being considered by the Council for a new scheme on the site.
8. Farmwood Close. This is an historic site with a LDC for the implementation of 10 units which have not been completed. The land is currently being marketed.
9. City Vision. The developer is on site and progressing.
10. Trinity View. The developer is on site and progressing.
11. Glan Llyn. The developer is on site and progressing. A third developer (St Modwen) are anticipating to begin work on Phase 2 in 2015.
12. Mill Street. The site is owned by NCC who will market the site.
13. Herbert Road. This site is adjacent to the Glebeland site noted above. The site is compliant with the overall strategy of the LDP being a brownfield urban site in need of regeneration. There is no application on the site but the land owner notes their intention to sell the site for development.
14. Whitehead Works. This site is part of a Welsh Government regeneration scheme, which anticipates delivery to begin in 2016.
15. Bideford Road. This site is compliant with the overall strategy of the LDP being a brownfield urban site with potential for regeneration. There is no application on the site but the area is the remaining part of a housing estate development.

The information above clearly shows that although there are a number of sites which have continued from one development plan to the other they have in the main progressed significantly or that they will be delivered within the plan period. It is also important to note that it was made clear through the UDP process that the growth proposed in the east of the city (i.e. Glan Llyn and Llanwern Village) was not anticipated to be wholly delivered within the UDP plan period.

Deliverability and Supply
The Plan identifies its housing and employment land supply for the plan period which is based on an assessment of need. The clear strategy for the Plan is for growth and it will be through the successful implementation of the policies of the Plan that this will be achieved. There is a clear link between housing supply and economic growth which is why the supply will be monitored annually.

The Plan does however provide enough land to ensure that a 5 year supply is met and, that although the annual build rate is higher than currently achieved, even when taking into account the residual method of calculation the Council has provided an adequate supply of land which has been agreed with the industry through the JHLAS process.
Planning Policy Wales sets out the overarching requirement for development to be placed on brownfield sites in preference to greenfield sites. The plan allocates 82% housing units on brownfield sites with the remaining 18% of units on greenfield sites (these calculations excludes the completions, windfall and small sites supply figures). The LDP is therefore compliant with Planning Policy Wales in terms that it has followed the search sequence criteria starting with the re-use of previously developed land and buildings within settlements which are located in areas accessible to jobs and services, where there is existing infrastructure and the scope to build sustainable communities.

The representation raises a concern that one of the reasons for a drop in housing delivery over the past few years is due to the lack of greenfield sites. This is not an accurate picture of the reality of housing supply in Newport. Brownfield sites are being delivered in the same economic environment as those greenfield sites with planning permission which do not have the same level of abnormal costs to consider.

As illustrated above the perception that the Plan is overly reliant on sites inherited from the UDP period is not well founded. In addition a number of the sites outlined by the developer as being undeliverable are in fact progressing e.g. Alcan. Not all the sites noted are counted as part of the housing supply due to the lack of evidence of deliverability e.g. Newport Athletic Club. The Council has been realistic in its approach to the housing supply set out in the Plan which is based on the annual JHLAS process to ensure that the sites can be delivered to ensure the strategy is met.

The rate of windfall sites is also questioned and as noted in Planning Policy Wales there is a need to consider the supply from such sites. The LDP based its figures on a review of the past trend of windfall supply which has been drastically cut to reflect the need for the Plan to remain flexible whilst concentrating growth on allocated housing sites and tight settlement boundaries. The plan will be monitored as to the percentage of houses developed on allocated housing sites to ensure that the housing policies of the plan are being effectively implemented.

Range and Choice
The supply of housing is considered to provide for a clear range and choice of housing which is a clear concern for many representors. The housing sites within the Plan are located across the City, with a clear focus on regeneration in the east as per the established strategy. The Plan provides a supply of affordable units for a mixture of needs as well as providing a mix of family homes and inner city living to cater for the broad housing market. The opportunity to provide homes in more rural locations has been investigated and there was no clear evidence to justify expansion to existing settlements. The Plan therefore has provided the opportunity for exception sites where such justification can be produced.

Flexibility
As the representation notes there is no set flexibility figure required for housing supply within development plans. However, during the examination of the Brecon Beacons National Park LDP WG noted a notional figure of 10% but that needed to reflect local circumstances. Other authorities within South East Wales have a range of 12-20% flexibility. It is good practice to allow for unknowns and the need for flexibility within a development plan is inherent from National Planning Policy. In Newport’s case the majority of the housing supply has planning permission or is being progressed. Those remaining 9 sites without planning permission are in line with the overall strategy or regeneration needs of the plan. Together they provide a 12% oversupply which is considered appropriate to enable to plan to cope with uncertainties that may arise over the plan period.

Strategy compliance and delivery.
It is considered that the plan provides a more than adequate supply of housing, both market and affordable, which is both deliverable and viable. Many of the sites have progressed since the Revised Deposit Plan was written and there is a steady supply of housing being achieved across Newport. The Plan identifies its housing and employment land supply for the plan period based on an assessment of need. The clear strategy for the Plan is for growth and it will be through the successful implementation of the policies of the Plan that this will be achieved. There is a clear link between housing supply and economic growth which is why the supply will be monitored annually.

The work undertaken by NLP did consider the influence from Cardiff but the final recommended scenario did not take into account the potential cross-boundary issues with Cardiff that were highlighted by Edge Analytics as it does not take account of the recalibration that resulted in a substantial adjustment to the population projections for Newport. The reason for this is that it has not been possible to verify the analysis that informed the figures presented by Edge Analytics. This again points towards an upward pressure in the local housing requirements for Newport compared to the 2008 Welsh Government projections.

This proposed site is in Green Wedge outside the settlement boundary of Castleton and in the proposed Wentlooge Special Landscape Area.

The prime purpose of Green Wedge is to prevent coalescence between urban areas. The designation in not made necessarily on the basis of the physical quality of the landscape, but rather to maintain their openness. This allocation should be retained in order to ensure the openness of the area. The boundary of Castleton was reviewed in the Settlement Boundary Methodology Background Paper and it is stated that it is proposed to continue to draw the village boundaries tightly around Castleton as the village is not considered to be a sustainable location for new development proposals.
Furthermore there is sufficient supply of housing land so that there is not a requirement to allocate a Greenfield site in an unsustainable location. It is recommended that site remain within the Green Wedge allocation.
Document: Revised LDP, p. 65
Policy: H01

Summary: Inclusion of site for residential development at Gelli Bach, Castleton.

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• Representation Regarding Policy SP10 Residential Requirement
• Representation Regarding Policy H1 Housing Supply
1.0 INTRODUCTION

1.1 This Landscape Assessment assesses the allocation potential and subsequent development of land off Marshfield Road for residential use. The document will assess whether the allocation of the site for residential development can be achieved without impacting upon the landscape character and visual amenity of its surrounding landscape.

1.2 A site survey and subsequent desktop research was carried out in July 2013 and the findings are contained within this assessment.

2.0 SITE AND LANDSCAPE PLANNING CONTEXT

Site Context

2.1 The site at Castleton is located off Marshfield Road and is served by an access road which provides access to the properties to the north western corner of the site.

2.2 Castleton benefits from local amenities and services within walking distance of the site, including churches, primary school, two public houses, petrol filling station with shop, a local shop and post office, community centre, garden centre and formal play facilities including changing rooms. Located adjacent to the site on Marshfield Road are bus stops providing NW-bound and South-bound services. The site is also located 640 metres south of the Castleton (South-Westbound and North-Eastbound) bus services which provide regular and also direct services to Cardiff and Newport.

2.3 The site, which is approximately 1.1 hectares in size, is made up of one parcel of low grade agricultural land which is currently unused and an existing residential property and associated curtilage.

2.4 The site boundaries are formed by an unnamed access road which immediately adjoins residential boundaries to the west. The southern boundary is formed by a recreation field and the western boundary by agricultural land. The northern boundary is formed by an unnamed access road which immediately adjoins a large factory.

2.5 The eastern and southern boundaries are formed by mature trees and vegetation which effectively screen the site from the surrounding area.

Landscape Planning Context

2.6 The site is not subject to any landscape or ecological designations and does not contain any Public Rights of Way.

2.7 The site does not contain any trees which are subject to Tree Preservation Orders (TPO’s).

3.0 LANDSCAPE CHARACTER AND VISUAL ASSESSMENT

3.1 The site is located within a semi-rural context. Due to the undulating topography of the surrounding landscape around the site and the tall mature trees, which define the parcel of land and run along the eastern boundary, the views of the site are screened from public vantage points / footpaths and roads. The site survey confirms this with no medium / long view points of the site from the surrounding areas, as illustrated below:

3.2 Viewpoints from the A48 which effectively ‘looks down’ onto Castleton are very sporadic and again provide only minimal view points of the site, as illustrated by the photos below:
3.3 Furthermore, due to the sites relationship with existing housing, which forms the western site boundary, its development for residential purposes would be neither prominent nor isolated and could complement the existing semi-rural character of Castleton.

3.4 The site is well screened from the majority of public vantage points / footpaths. The following photos are taken from Bakery Lane and illustrates that the site is well screened from the southern boundary:

3.5 Accordingly, any residential development will have a minimal impact on the landscape character and visual amenity impacts upon the surrounding landscape.

4.0 LANDSCAPE / DEVELOPMENT STRATEGY

4.1 Whilst the natural character of its surrounding landscape provides substantial screening from medium / long views.

4.2 These development principles for the site are illustrated on the attached development / landscape strategy, attached in Appendix A.

4.3 It demonstrates that any development in the northern field ensures the houses are extremely well screened due to existing hedgerows and mature trees. This will ensure that there is no visual harm on the adjacent landscape / countryside.

5.0 SUMMARY AND CONCLUSIONS

5.1 It is considered that the land at Gelli Bach is suitable for residential developments as:

- The undulating topography of the surrounding landscape and the tall mature trees which surround the site ensure that the site is well screened from the vast majority of public vantage points / footpaths.

- The site is bound by residential boundaries to the northern and western boundaries which will ensure that its development for residential purposes would neither be prominent nor isolated and could complement the existing semi-rural character of Castleton.
Comments made concerning policies SP7, SP8 and SP10 are dealt with under separate representations.

Justification of Requirement

Following representations at the Deposit LDP stage the housing requirement figure has been justified and increased from the proposed Welsh Government Population projections. There is scope for an authority to deviate from the WG population projections but this deviation is required to be well evidenced. The NLP assessment sets out this evidence base and illustrates that Newport, as one of the few areas in Wales with an anticipated population increase noted in the Census, is set to grow and reflects the Council’s policy aspiration for growth. It should be recognised that the majority of the sites (46 of 55) have planning permission or permission subject to a Section 106 agreement. This established supply with clear market intent illustrates not only that a growth strategy is appropriate but achievable.

As noted above, the Plan identifies its housing requirement for the plan period based on an assessment of need and this is also true of its employment land requirements. The clear strategy for the Plan is for growth and it will be through the successful implementation of the policies of the Plan that this will be achieved. There is a clear link between housing supply and economic growth which is why the supply will be monitored annually.

Reliance on previous Development Plan sites

The Local Development Plan does have a number of housing sites which were identified within the Unitary Development Plan. In total there are 15 of the 55 housing sites which continue into the new plan. The majority of these sites have progressed significantly from the UDP, as noted below:

1. Land adj. McReadys. As of 1st April 2013 the developer is on site preparing the site for development.
2. Eastern Expansion Area. Planning permission has been granted with a signed Section 106 agreement. Gallagher Estates have confirmed through the JHLAS process that they will be delivering units on site in 2015.
3. Glebelands. This site has an extant planning permission associated with the school site adj to the residential area. The land has recently been sold to a developer.
4. Monmouthshire Bank Sidings. Redrow are on site and progressing.
5. Traston Lane. The site has planning permission and the agent has confirmed that they anticipate development on the site in 2015.
6. Pirelli. This site has been sold to the Seren Group (RSL) who launched the development in September 2013.
7. Ty Du Works. An application is being considered by the Council for a new scheme on the site.
8. Farmwood Close. This is an historic site with a LDC for the implementation of 10 units which have not been completed. The land is currently being marketed.
9. City Vision. The developer is on site and progressing.
10. Trinity View. The developer is on site and progressing.
11. Glan Lyn. The developer is on site and progressing. A third developer (St Modwen) are anticipating to begin work on Phase 2 in 2015.
12. Mill Street. The site is owned by NCC who will market the site.
13. Herbert Herbert Road. This site is adjacent to the Glebeland site noted above. The site is compliant with the overall strategy of the LDP being a brownfield urban site in need of regeneration. There is no application on the site but the area land owner notes their intention to sell the site for development.
14. Whitehead Works. This site is part of a Welsh Government regeneration scheme, which anticipates delivery to begin in 2016.
15. Bideford Road. This site is compliant with the overall strategy of the LDP being a brownfield urban site with potential for regeneration. There is no application on the site but the area is the remaining part of a housing estate development.

The information above clearly shows that although there are a number of sites which have continued from one development plan to the other they have in the main progressed significantly or that they will be delivered within the plan period. It is also important to note that it was made clear through the UDP process that the growth proposed in the east of the city (i.e. Glan Llyn and Llanwern Village) was not anticipated to be delivered wholly within the UDP plan period.

Deliverability and Supply

The Plan identifies its housing and employment land supply for the plan period which is based on an assessment of need. The clear strategy for the Plan is for growth and it will be through the successful implementation of the policies of the Plan that this will be achieved. There is a clear link between housing supply and economic growth which is why the supply will be monitored annually.
The Plan does however provide enough land to ensure that a 5 year supply is met and, that although the annual build rate is higher than currently achieved, even when taking into account the residual method of calculation the Council has provided an adequate supply of land which has been agreed with the industry through the JHLAS process.

Planning Policy Wales sets out the overarching requirement for development to be placed on brownfield sites in preference to greenfield sites. The plan allocates 82% housing units on brownfield sites with the remaining 18% of units on greenfield sites (these calculations excludes the completions, windfall and small sites supply figures). The LDP is therefore compliant with Planning Policy Wales in terms that it has followed the search sequence criteria starting with the re-use of previously developed land and buildings within settlements which are located in areas accessible to jobs and services, where there is existing infrastructure and the scope to build sustainable communities.

The representation raises a concern that one of the reasons for a drop in housing delivery over the past few years is due to the lack of greenfield sites. This is not an accurate picture of the reality of housing supply in Newport. Brownfield sites are being delivered in the same economic environment as those greenfield sites with planning permission which do not have the same level of abnormal costs to consider.

As illustrated above the perception that the Plan is overly reliant on sites inherited from the UDP period is not well founded. In addition a number of the sites outlined by the developer as being undeliverable are in fact progressing e.g. Alcan. Not all the sites noted are counted as part of the housing supply due to the lack of evidence of deliverability e.g. Newport Athletic Club. The Council has been realistic in its approach to the housing supply set out in the Plan which is based on the annual JHLAS process to ensure that the sites can be delivered to ensure the strategy is met.

The rate of windfall sites is also questioned and as noted in Planning Policy Wales there is a need to consider the supply from such sites. The LDP based its figures on a review of the past trend of windfall supply which has been drastically cut to reflect the need for the Plan to remain flexible whilst concentrating growth on allocated housing sites and tight settlement boundaries. The plan will be monitored as to the percentage of houses developed on allocated housing sites to ensure that the housing policies of the plan are being effectively implemented.

Range and Choice
The supply of housing is considered to provide for a clear range and choice of housing which is a clear concern for many representors. The housing sites within the Plan are located across the City, with a clear focus on regeneration in the east as per the established strategy. The Plan provides a supply of affordable units for a mixture of needs as well as providing a mix of family homes and inner city living to cater for the broad housing market. The opportunity to provide homes in more rural locations has been investigated and there was no clear evidence to justify expansion to existing settlements. The Plan therefore has provided the opportunity for exception sites where such justification can be produced.

Flexibility
As the representation notes there is no set flexibility figure required for housing supply within development plans. However, during the examination of the Brecon Beacons National Park LDP WG noted a notional figure of 10% but that needed to reflect local circumstances. Other authorities within South East Wales have a range of 12-20% flexibility. It is good practice to allow for unknowns and the need for flexibility within a development plan is inherent from National Planning Policy. In Newport’s case the majority of the housing supply has planning permission or is being progressed. Those remaining 9 sites without planning permission are in line with the overall strategy or regeneration needs of the plan. Together they provide a 12% oversupply which is considered appropriate to enable to plan to cope with uncertainties that may arise over the plan period.

Strategy compliance and delivery.
It is considered that the plan provides a more than adequate supply of housing, both market and affordable, which is both deliverable and viable. Many of the sites have progressed since the Revised Deposit Plan was written and there is a steady supply of housing being achieved across Newport. The Plan identifies its housing and employment land supply for the plan period based on an assessment of need. The clear strategy for the Plan is for growth and it will be through the successful implementation of the policies of the Plan that this will be achieved. There is a clear link between housing supply and economic growth which is why the supply will be monitored annually.

The work undertaken by NLP did consider the influence from Cardiff but the final recommended scenario did not take into account the potential cross-boundary issues with Cardiff that were highlighted by Edge Analytics as it does not take account of the recalibration that resulted in a substantial adjustment to the population projections for Newport. The reason for this is that it has not been possible to verify the analysis that informed the figures presented by Edge Analytics. This again points towards an upward pressure in the local housing requirements for Newport compared to the 2008 Welsh Government projections.

This site at Gelli Bach is in Green Wedge outside the settlement boundary of Castleton and in the proposed Wentlooge Special Landscape Area.

The prime purpose of Green Wedge is to prevent coalescence between urban areas. The designation in not made necessarily on the basis of the physical quality of the landscape, but rather to...
maintain their openness. This allocation should be retained in order to ensure the openness of the area. The boundary of Castleton was reviewed in the Settlement Boundary Methodology Background Paper and it is stated that it is proposed to continue to draw the village boundaries tightly around Castleton as the village is not considered to be a sustainable location for new development proposals. Furthermore there is sufficient supply of housing land so that there is not a requirement to allocate a Greenfield site in an unsustainable location. It is recommended that site remain within the Green Wedge allocation.

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Soundness Test

The plan fails C1, C2, C4, CE1 and CE2
An objection is made in relation to the site boundary for the NRPDC, as indicated within the Proposals Map/Proposal Map Inset 25. The NRPDC, as drawn within the RDLDP, currently excludes the land under FLC1’s control, which was previously included within the District Centre designation, as set out within the UDP and the East Newport Development Framework Supplementary Planning Guidance (May 2007). The UDP also included a retail commitment designation on the vacant site, adjacent Seven Stiles Avenue (between the Matalan and Lookers Citroën sites). This has also been removed from the RDLDP Proposals Map without justification as the permission remains extant.

The inclusion of the FLC1 land within the NRPDC was fully considered by the UDP Inspector within the report on objections, at paragraph 6.60 to 6.65, and under the recommendations R6.9 and R6.10 (extracts enclosed). The Inspector noted that although Newport Retail Park was not within the EEA itself, it does adjoin it with potential for direct access from into the former Llanwern steelworks site – now the subject of significant residential development. Furthermore, additional links were planned in order to improve access to the greenfield land to the north of the railway line, also designated for residential development. Newport Retail Park was considered to be worthy of designation as a District Centre given its existing, thriving shopping centre and its capability to serve the EEA from the outset. The area covered by the designation has been reduced without justification in the RDLDP.

The UDP Inspector also considered the additional caveats that the Council was seeking to place on its designation as a Retail Park by proposing to restrict new floorspace to that which would serve solely the EEA. Furthermore, new developments would need to be specifically justified on the basis of a district shopping centre function so as not to result in any adverse impact on the city centre. The Inspector found these additional caveats to be unnecessary and contrary to guidance contained within Planning Policy Wales (PPW), the substance of which has not changed in the latest revision (PPW, Edition 5, November 2012). Similar caveats are proposed to be reintroduced into the RDLDP without justification. The proposed caveats remain contrary to PPW and are objected to in further detail below.

The EEA remains a firm commitment with a proposed allocation within the RDLDP (under Policy SP11: Eastern Expansion Area) and outline planning permission for up to 4,000 dwellings, with construction having commenced. Together with this significant level of housing provision, the Council are seeking to allocate new residential land in the form of the Woodland Site, Ringland (Policy H1: Housing Sites (H55)). This would add a further 300 dwellings to this area, in addition to the EEA (Policy H1: Housing Sites (H3)) commitment of 1,100 dwellings and the Glan Llyn (Policy SP11: Eastern Expansion Area) proposals for 4,000 units. Over 4,100 new dwellings are anticipated within this area within the plan period (using the figures quoted in the RDLDP chapter 5). Large scale employment land commitments and designation are identified within the RDLDP under Policy EM1, which will also create significant demand for a sustainable District Centre in addition to the housing planned.

The suggested amendment to an existing site allocation does not require a supporting Sustainability Appraisal (SA). This conclusion has been reached based on several factors which indicate there is highly unlikely to be any significant environmental effect arising from its allocation. Importantly, the site benefits from an extant planning permission for redevelopment to provide two additional retail units and car parking. This extant planning permission is consistent with the site’s current allocation as part of the Newport Retail Park within the UDP. The site forms, in part, previously developed land and is located within a neighbourhood area subject to ongoing regeneration proposals. On this point, the site is sustainably located abutting the EEA which is an identified (and emerging) area for the sustainable urban growth of Newport. Furthermore, the site has no known statutory or non-statutory environmental designations or constraints. As such, it is concluded that the relatively minor amendment sought to the boundary of an existing site allocation does not need to be accompanied by a SA.

In short, the change sought is to amend the NRPDC boundary to include FLC1’s land interests at Matalan, Lookers Citroën and the land adjacent Seven Stiles Avenue, as per the attached plan (and consistent amendments to Policy R7). This amendment does not need to be the subject of a further SA.

Objection to Policy R6 – Retail Proposals in District Centres

Policy R6 covers District Centres, listing all District Centres except the NRPDC. It sets out the criteria based policy for proposals within and adjacent to district shopping centres. The exclusion of Newport Retail Park from the application of the retail tests (ie. sequential and need tests) (as found in the latter part of Policy R6) contradicts the direction of the UDP Inspector when previously considering the caveats to the Newport Retail Park policies, as discussed above.

Paragraph 10.2.1 of PPW states that Local Planning Authorities should “...set out a framework for the future of town, district, local and village centres in their area which promotes a successful retailing sector supporting existing communities and centres.” PPW continues to state that development plans should also establish the existing hierarchy of centres, identify those which fulfil specialist functions and be clear about their future roles. In this case, the role of NRPDC and its future function has already been assessed as part of the UDP – to be required to serve the future needs of the EEA.

As highlighted above, the EEA is an existing commitment, is extant, and draft allocations within the RDLDP seek to extend this further through additional housing allocations. The future role of Newport Retail Park is, therefore, to both meet the needs of the existing community and the significant expansion of its catchment population within the plan period. As such, a reduction in the area and a restriction on any further retail development within NRPDC, as proposed by the RDLDP, is unjustified. As a consequence, NRPDC should be included within the list of District Centres referred to in Policy R6.

In short, the change requested is to include Newport Retail Park District Centre within the list of District Centres referred to in Policy R6.
The Newport Retail Park is a key element of the sustainable growth planned for the city through the Eastern Expansion Area and committed development at Glan Llyn. The reduction in the district centre boundary and the proposal to place more restrictions on the district centre than applied to other district centres is contrary to the previous endorsement by the UDP Inspector and to PPW, and as such it requires full examination and representations to be made before the Inspector at the relevant hearing sessions.

Item Question | Council Responses
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2 2 | Soundness of LDP

Tick-box reply

- Soundness of LDP: No
### Boundary

The preparation of the Local Development Plan (LDP) is an appropriate time to review boundaries defined in the Plan. Accordingly, a review of all district centres allocated in the Adopted Unitary Development Plan has been undertaken for the purpose of coherently defining the retail centre on a clear and adopted Plan, confirming its position in the retail hierarchy for the application of the sequential test and implementation of retail planning policy, and reflecting its role as a district centre to serve the eastern catchment area.

The exclusion of the part of the park next to the EEA is also considered appropriate. The layout and function of the area between the defined centre in the LDP and the intervening boundary with the Eastern Expansion Area is different to the proposed defined centre area. It is separated from it by the estate access road and retail units such as Marks and Spencers back onto the area with opportunities for full integration limited. The area functions predominantly as a car sales and leisure area dominated by car sales areas, the large vacant Megabowl unit and a large cinema with smaller scale A3 users scattered around the southern end. Matalan occupies a remote position in the northern portion. Whilst it is acknowledged that the area is an established commercial and leisure area with a number of extant permissions, notably for retail uses, there are no existing direct connections between this area and the Eastern Expansion Area and uncertainty in terms of whether these can ever be achieved in the longer term. The existing pedestrian route via the Queensway roadway pathway offers the existing and most realistic pedestrian link from the EEA in the long term. There is a desire to secure the infrastructure to improve access from this route into the district centre and within the district centre itself, and to facilitate a pedestrian link within this area to meet the intervening boundary. The most obvious place to locate this is at the northern end of the Megabowl unit. This was secured as part of an extant but currently unimplemented permission to convert the unit to a supermarket. However, the ability to secure a continuation of this link on the EEA side of the boundary is also uncertain. Therefore, at this time a pedestrian link between the district centre and the residential development within the EEA, over and above the existing roadside pathway, is an aspiration for the Council but cannot currently be guaranteed.

The Council is of the view that the inclusion of this area within the district centre boundary is not appropriate. It is for the LPA to consider and review its district centre boundaries to ensure that they reflect the centre’s future role in terms of current retail planning policy and the retail hierarchy. The Council has included what it feels currently reflects a reasonable and appropriate district centre boundary having regard to the centre’s size, layout, location, range of uses, catchment, and current and likely function over the Plan period. This has regard to the Newport Retail Capacity Study undertaken on the Council’s behalf by Colliers International, the city centre first approach in retail planning policy and the form and function of Newport’s City Centre. A cumbersome and unduly large district centre against the backdrop of current retail planning policy poses a threat to the vitality and viability of the city centre in our view and is unlike any other district centre in Newport in this respect. The sheer scale and ground area of the district centre as it currently stands (i.e. including the area in between) gives opportunities for new retail development pressure and curtails development over recent years shows that Newport Retail Park, by exceeding its role as a District Centre, has had a very damaging effect on the City Centre.

#### Issue – Inspector’s Report

It is acknowledged that a similar set of arguments were discussed at the UDP Inquiry and the Inspector recommended the Plan should not include any caveats for Newport Retail Park District Centre. However, the preparation of the LDP provides an opportunity to review policies and assess whether they are achieving their objectives. For this reason the policy approach taken towards NRPD has been reviewed alongside the evidence and policy recommendations set out in the Collier’s Retail Study and Capacity Assessment (July 2010). A new policy approach in the Local Development Plan is therefore considered acceptable and justified. The concerns raised by the Council in the UDP inquiry have been realised, and Newport Retail Park has significantly adversely affected the vitality and visibility of the City Centre. In order to maintain the primacy of the City Centre, steps must be taken to limit the expansion of Newport Retail Park so that it functions as a District Centre.

#### Separate Policy Approach

A separate policy approach to NR is considered justified and in accordance with PPW (5th ed, Nov 2012) which notes that development plans should establish existing hierarchy of centres and be clear about their future roles (10.2.1). Within this context Policy R7 has been prepared as the Council considers Newport Retail Park District Centre to be different to its other district centres and to have greater potential to have an impact on the City Centre. This is supported by the findings of the Colliers Retail Study and Assessment (July 2010). The Study notes that 55% of Newport’s occupied retail floorspace in district centres is at Newport Retail Park District Centre. The Centre’s potential to compete with the City Centre is also acknowledged at paragraph 8.25. Notwithstanding, the district centre allocation, the Collier’s Study recommends a number of policy restrictions that should be considered for Newport Retail Park District Centre (para 8.30 – 8.39). Policy R7 seeks to incorporate these recommendations in a way that allows retail development that is appropriate in scale to a district centre and does not impact on the vitality and viability of the City Centre.

#### Policy Title

For consistency and clarification purposes a revision to the Policy title is considered acceptable. The title will now read “Retail Proposals in Newport Retail Park District Centre”.

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12/02/2014 Page 467 of 1581
Opening part of the Policy

Past experience of retail applications submitted in relation to Newport Retail Park District Centre, is that applicants submit evidence defining it as a town centre for the purposes of the application of the sequential test. Defining NRP as a District Centre within the policy clearly establishes its position in the retail hierarchy and sets out the approach the Council will take in assessing proposals that come forward.

The justification for allocating Newport Retail Park as a District Centre was to serve the Eastern Expansion Area, without this purpose it would have remained an out-of-centre retail park. Policy R7 reflects this in the opening part of the policy to clearly set out its primary function. Its wider role of serving the surrounding settlements will be reflected in paragraph 8.22.

Policy R7 prejudices applications for the Plan period

The Colliers Retail Study and Capacity Assessment (July 2010) and follow up letter dated February 2013 have formed the evidence and background work to the preparation of Policy R7. The Colliers Retail Study covers the plan period up to 2026 and has made policy recommendations for an appropriate LDP response for this period.

Criterion (i)
Extant consents remain unaffected by the proposed policy. However, should they lapse new applications would be subject to the Local Development Plan policies once adopted. Criterion (i) is derived from the Colliers Retail Study recommendations that notes “further expansion of convenience retailing would change the function and character of the centre, expanding it beyond what is appropriate in a district centre and thereby changing its position in the hierarchy (para 8.37). This point is expanded upon in the Collier’s Supplement (February 2013) which seeks to ensure convenience retailing proposals that come forward are of an appropriate scale to a district centre. The threshold of 929sq m retail sales floorspace is considered appropriate as the Collier’s Supplement states, based upon the current actual retail sales floorspace of operators, it would permit smaller stores serving a local function, such as convenience stores, discounters and small supermarkets, but would prevent the addition of new superstores which are likely to draw trade from a wider area.

Criterion (ii)
The January 2013 date is a point in time to provide a basis to measure any increase/decrease in net retail floorspace in the district centre. The thought process to this criterion is set out in Collier’s Supplement (February 2013) which notes the approach would be to make larger scale redevelopment in the centre or its extension, subject to the same tests as out of centre development – justified on the basis of the unusual justification for the district centre’s designation. This approach would also enable the sequential approach to be applied in a controlled manner.

The net increase figure is an absolute figure based on the net floorspace as measured at January 2013. It is felt this criterion, allows any potential expansion to be monitored and implemented at a scale appropriate to the district centre’s position in the retail hierarchy. As noted above the justification behind allocating Newport Retail Park as a District Centre was to serve the Eastern Expansion area, this principal function has not changed, although paragraph 8.22 has been updated to reflect its wider role.

Criterion (iii)
Colliers Retail Study (July 2010) at paragraph 8.35 notes there is potential for Newport Retail Park District Centre to change the nature of the goods it sells and thereby to compete directly with the City Centre for the sale of non-bulky comparison goods. Criterion iii is therefore considered to be justified in the interest of protecting the vitality and viability of the City Centre.

Criterion (iv)
It is noted that Policy R8 also covers non retail uses in District Centres, however criterion iv) of Policy R7 seeks to ensure the proposed use is of a scale appropriate for a district centre and Newport Retail Park’s primary purpose of serving the Eastern Expansion Area.

Criterion (v)
The suggested wording is not considered to change the purpose of the criterion, therefore no change is proposed to the Plan.

Definition of Retail Floorspace

A definition of retail sales floorspace has been added to the Plan to aid measuring it when considering applications and set out clearly the Council’s interpretation of retail sales floorspace. It has been included within the policy text to aid the reader. However, it is accepted that it is a definition rather than policy. The definition will be retained, but added to the supporting text.

Paragraph 8.21 – The evidence base to Policy R7 is set out in the Collier’s Retail Study, which is referenced throughout the supporting text. The following sentence will be added to paragraph 8.21 to reflect the positive contribution Newport Retail Park District Centre has made in providing jobs, services and retail provision for the Eastern Expansion Area:

“Newport Retail Park District Centre has successfully developed into a centre which provides shops, jobs and helps retain retail expenditure within Newport. However ……………..”
Paragraph 8.24 – 8.28
As no changes are proposed to criteria (i) and (ii) of Policy R7, paragraphs 8.24 – 8.28 remain relevant.

Paragraph 8.30
Paragraph remains relevant as it supplements criterion iv).
Item Question | Representation Text
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10 | Soundness Test
   | The plan fails C1, C2, C4, CE1 and CE2

11 | Representation
   | Objection to Policy R7 – Newport Retail Park District Centre
   | The policy recognises the defined boundary (as seen in Proposals Map Inset 25), and that development outside of this area will be deemed ‘out-of-centre’. In accordance with our comments to the Proposals Map/Proposals Map Inset 25 above, the boundary of the NRPDC therefore needs to be amended to include the aforementioned land.
   | Policy R7 establishes numerous restrictive criteria to which proposals within and around the NRPDC will be subjected to. This is considered contrary to PPW and damaging to the future health, attractiveness, vitality and viability of NRPDC. Paragraph 10.2.8 of PPW states that policies should support the management of town centres to allow enhancement and promotion as an important factor in achieving vitality and viability of the centres. Preventing new floorspace within NRPDC would not only be contrary to the overall aims of PPW and Technical Advice Note (TAN) 4: Retailing and Town Centres (November 2006), to support and concentrate new retail development within existing identified centres, it would also be damaging to the future investment and enhancement of the centre, to its long term detriment.
   | The inclusion of Policy R7 within the RDLDP will, again, be contrary to PPW and the aims to support the vitality and viability of District Centres. The aims of Policy R7 to improve accessibility to adjoining residential development for pedestrians and cyclists could only be met through additional retail development and the forging of improved links and attractive pedestrian routes to the EEA. This would be best accommodated through new retail development within FLCL’s land, identified adjacent to Seven Stiles Avenue and through allowing additional floorspace within the currently vacant site (i.e. the site identified as a retail commitment within the Newport UDP).
   | Development within the NRPDC boundary (as proposed to be extended by these representations) should not be subject to any additional restriction compared to any other District Centres within the RDLDP. To do so would prevent investment and improvement of the District Centre and its integration with the EEA and new residential areas to the north. As a consequence, Policy R7 should be deleted in its entirety along with the supporting text. On this basis, any control required to the NRPDC will be possible by including it within Policy R6, as proposed in the submissions above, and therefore subject to the four development management criteria within Policy R6.
   | In short, the change sought is the deletion of the unnecessarily restrictive Policy R7 and supporting text at paragraphs 8.21 to 8.32. The inclusion of NRPDC within Policy R6 would provide sufficient control through the development management process.

12 | Speaking at Public Examination
   | Yes
   | The Newport Retail Park is a key element of the sustainable growth planned for the city through the Eastern Expansion Area and committed development at Glan Llyn. The reduction in the district centre boundary and the proposal to place more restrictions on the district centre than applied to other district centres is contrary to the previous endorsement by the UDP Inspector and to PPW, and as such it requires full examination and representations to be made before the Inspector at the relevant hearing sessions.

Item Question | Tick-box reply
--- | ---
2 2 | Soundness of LDP
   | No

Item Question | Council Responses
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Boundary

The preparation of the Local Development Plan (LDP) is an appropriate time to review boundaries defined in the Plan. Accordingly a review of all district centres allocated in the Adopted Unitary Development Plan has been undertaken for the preparation of the LDP. The definition of a boundary for Newport Retail Park District Centre within the LDP is of particular importance as the UDP does not define a boundary, with the East Newport Development Framework Supplementary Planning Guidance and appeals decisions forming the basis of a boundary. The defined boundary in the Revised Deposit LDP seeks to reasonably provide Newport Retail Park District Centre with a defensible boundary for Development Management purposes and give certainty to future investors, developers and officers in terms of defining the retail centre on a clear and adopted Plan, confirming its position in the retail hierarchy for the application of the sequential test and implementation of retail planning policy, and reflecting its role as a district centre to serve the eastern catchment area.

The exclusion of the part of the park next to the EEA is also considered appropriate. The layout and function of the area between the defined centre in the LDP and the intervening boundary with the Eastern Expansion Area is different to the proposed defined centre area. It is separated from it by the estate access road and retail units such as Marks and Spencers back onto the area with the opportunities for full integration limited. The area functions predominantly as a car sales and leisure area dominated by 3 car sales areas, the large vacant Megabowl unit and a large cinema with available retail uses, notably for retail uses, there are no existing direct connections between this area and the Eastern Expansion Area and uncertainty in terms of whether these can ever be achieved in the longer term. The existing pedestrian route via the Queensway roadside pathway offers the existing and most realistic pedestrian link from the EEA in the long term. There is a desire to secure the infrastructure to improve access from this route into the district centre and within the district centre itself, and to facilitate a pedestrian link within this area to meet the intervening boundary. The most obvious place to locate this is at the northern end of the Megabowl unit. This was secured as part of an extant but currently unimplemented permission to convert the unit to a supermarket. However, the ability to secure a continuation of this link on the EEA side of the boundary is also uncertain. Therefore, at this time a pedestrian link between the district centre and the residential development within the EEA, over and above the existing roadside pathway, is an aspiration for the Council but cannot currently be guaranteed.

Issue – Inspector's Report

It is acknowledged that a similar set of arguments were discussed at the UDP Inquiry and the Inspector recommended the Plan should not include any caveats for Newport Retail Park District Centre. However, the preparation of the LDP provides an opportunity to review policies and assess whether they are achieving their objectives. For this reason the policy approach taken towards NRPDC has been reviewed alongside the evidence and policy recommendations set out in the Collier’s Retail Study and Capacity Assessment (July 2010). A new policy approach in the Local Development Plan is therefore considered acceptable and justified.

Separate Policy Approach

A separate policy approach to NRP is considered justified and in accordance with PPW (5th ed, Nov 2012) which notes that development plans should establish existing hierarchy of centres and be clear about their future roles (10.2.1). Within this context Policy R7 has been prepared as the Council considers Newport Retail Park District Centre to be different to its other district centres and to have greater potential to have an impact on the City Centre. This is supported by the findings of the Colliers Retail Study and Assessment (July 2010). The Study notes that 55% of Newport’s occupied retail floorspace in district centres is at Newport Retail Park District Centre. The Centre’s potential to compete with the City Centre is also acknowledged at paragraph 8.25. Notwithstanding, the district centre allocation, the Collier’s Study recommends a number of policy restrictions that should be considered for Newport Retail Park District Centre (para 8.30 – 8.39). Policy R7 seeks to incorporate these recommendations in a way that allows retail development that is appropriate in scale to a district centre and does not impact on the vitality and viability of the City Centre.

Policy Title

For consistency and clarification purposes a revision to the Policy title is considered acceptable. The title will now read “Retail Proposals in Newport Retail Park District Centre”.

Opening part of the Policy

Past experience of retail applications submitted in relation to Newport Retail Park District Centre, is that applicants submit evidence defining it as a town centre for the purposes of the application of the
sequential test. Defining NRP as a District Centre within the policy clearly establishes its position in the retail hierarchy and sets out the approach the Council will take in assessing proposals that come forward.

The justification for allocating Newport Retail Park as a District Centre was to serve the Eastern Expansion Area, without this purpose it would have remained an out-of-centre retail park. Policy R7 reflects this in the opening part of the policy to clearly set out its primary function. Its wider role of serving the surrounding settlements will be reflected in paragraph 8.22.

Policy R7 prejudges applications for the Plan period

The Colliers Retail Study and Capacity Assessment (July 2010) and follow up letter dated February 2013 have formed the evidence and background work to the preparation of Policy R7. The Colliers Retail Study covers the plan period up to 2026 and has made policy recommendations for an appropriate LDP response for this period.

Criterion (i) Extant consents remain unaffected by the proposed policy. However, should they lapse new applications would be subject to the Local Development Plan policies once adopted. Criterion (i) is derived from the Colliers Retail Study recommendations that notes “further expansion of convenience retailing would change the function and character of the centre, expanding it beyond what is appropriate in a district centre and thereby changing its position in the hierarchy (para 8.37). This point is expanded upon in the Collier’s Supplement (February 2013) which seeks to ensure convenience retailing proposals that come forward are of an appropriate scale to a district centre. The threshold of 928sq m retail sales floorspace is considered appropriate as the Collier’s Supplement states, based upon the current actual retail sales floorspace of operators, it would permit smaller stores serving a local function, such as convenience stores, discounters and small supermarkets, but would prevent the addition of new superstores which are likely to draw trade from a wider area.

Criterion (ii) The January 2013 date is a point in time to provide a basis to measure any increase/decrease in net retail floorspace in the district centre. The thought process to this criterion is set out in Collier’s Supplement (February 2013) which notes the approach would be to make larger scale redevelopment in the centre or its extension, subject to the same tests as out of centre development – justified on the basis of the unusual justification for the district centre’s designation……this approach would also enable the sequential approach to be applied in a controlled manner.’

The net increase figure is an absolute figure based on the net floorspace as measured at January 2013. It is felt this criterion allows any potential expansion to be monitored and implemented at a scale appropriate to the district centre’s position in the retail hierarchy. As noted above the justification behind allocating Newport Retail Park as a District Centre was to serve the Eastern Expansion area, this principal function has not changed, although paragraph 8.22 has been updated to reflect its wider role.

Criterion (iii) Colliers Retail Study (July 2010) at paragraph 8.35 notes there is potential for Newport Retail Park District Centre to change the nature of the goods it sells and thereby to compete directly with the City Centre for the sale of non-bulky comparison goods. Criterion iii is therefore considered to be justified in the interest of protecting the vitality and viability of the City Centre.

Criterion (iv) It is noted that Policy R8 also covers non retail uses in District Centres, however criterion iv) of Policy R7 seeks to ensure the proposed use is of a scale appropriate for a district centre and Newport Retail Park’s primary purpose of serving the Eastern Expansion Area.

Criterion (v) The suggested wording is not considered to change the purpose of the criterion, therefore no change is proposed to the Plan.

Definition of Retail Floorspace

A definition of retail sales floorspace has been added to the Plan to aid measuring it when considering applications and set out clearly the Council’s interpretation of retail sales floorspace. It has been included within the policy text to aid the reader. However, it is accepted that it is a definition rather than policy. The definition will be retained, but added to the supporting text.

Paragraph 8.21 – The evidence base to Policy R7 is set out in the Collier’s Retail Study, which is referenced throughout the supporting text. The following sentence will be added to paragraph 8.21 to reflect the positive contribution Newport Retail Park District Centre has made in providing jobs, services and retail provision for the Eastern Expansion Area:

“Newport Retail Park District Centre has successfully developed into a centre which provides shops, jobs and helps retain retail expenditure within Newport. However …………..”

Paragraph 8.24 – 8.28

As no changes are proposed to criteria (i) and (ii) of Policy R7, paragraphs 8.24 – 8.28 remain relevant.
Paragraph 8.30
Paragraph remains relevant as it supplements criterion iv).
Representation Details
by: (No grouping)
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Document: Revised LDP, p.96
Policy: R07
Summary: Objection to Proposal Map and Inset 25

Item Question | Representation Text
-------------|--------------------------------------------------
5  5 | Add a new site
5  5 | Matalan and Dutton Forshaw, Newport Retail Park - candidate ref 2063.c1
10 10 | Soundness Test
10 10 | The plan fails C1, C2, C4, CE1 and CE2
11 11 | Representation
11 11 | Objection to Policy R7 – Newport Retail Park District Centre

The policy recognises the defined boundary (as seen in Proposals Map Inset 25), and that development outside of this area will be deemed ‘out-of-centre’. In accordance with our comments to the Proposals Map/Proposals Map Inset 25 above, the boundary of the NRPDC therefore needs to be amended to include the aforementioned land.

Policy R7 establishes numerous restrictive criteria to which proposals within and around the NRPDC will be subjected to. This is considered contrary to PPW and damaging to the future health, attractiveness, vitality and viability of NRPDC. Paragraph 10.2.8 of PPW states that policies should support the management of town centres to allow enhancement and promotion as an important factor in achieving vitality and viability of the centres. Preventing new floorspace within NRPDC would not only be contrary to the overall aims of PPW and Technical Advice Note (TAN) 4: Retailing and Town Centres (November 2006), to support and concentrate new retail development within existing identified centres, it would also be damaging to the future investment and enhancement of the centre, to its long term detriment.

The inclusion of Policy R7 within the RDLDP will, again, be contrary to PPW and the aims to support the vitality and viability of District Centres. The aims of Policy R7 to improve accessibility to adjoining residential development for pedestrians and cyclists could only be met through additional retail development and the forging of improved links and attractive pedestrian routes to the EEA. This would be best accommodated through new retail development within FLCL’s land, identified adjacent to Seven Stiles Avenue and through allowing additional floorspace within the currently vacant site (i.e. the site identified as a retail commitment within the Newport UDP).

Development within the NRPDC boundary (as proposed to be extended by these representations) should not be subject to any additional restriction compared to any other District Centres within the RDLDP. To do so would prevent investment and improvement of the District Centre and its integration with the EEA and new residential areas to the north. As a consequence, Policy R7 should be deleted in its entirety along with the supporting text. On this basis, any control required to the NRPDC will be possible by including it within Policy R6, as proposed in the submissions above, and therefore subject to the four development management criteria within Policy R6.

In short, the change sought is the deletion of the unnecessarily restrictive Policy R7 and supporting text at paragraphs 8.21 to 8.32. The inclusion of NRPDC within Policy R6 would provide sufficient control through the development management process.

12 12 | Speaking at Public Examination
12 12 | The Newport Retail Park is a key element of the sustainable growth planned for the city through the Eastern Expansion Area and committed development at Glen Llyn. The reduction in the district centre boundary and the proposal to place more restrictions on the district centre than applied to other district centres is contrary to the previous endorsement by the UDP Inspector and to PPW, and as such it requires full examination and representations to be made before the Inspector at the relevant hearing sessions.

Item Question | Tick-box reply
---------------|-----------------
2  2 | Soundness of LDP

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### Representation Details

**Document:** Revised LDP, p.22  
**Policy:** SP07  
**Summary:** Objection to SP7 - addition of new site at Poultry Plant, Castleton

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Chicken Processing Plant, Castleton

Please find enclosed, on behalf of and under instruction from AB Asset Management, representations to the Deposit LDP.

This submission:
- puts forward an Alternative Site Representations; and
- objects to selected policy provisions of the plan.

For each Alternative Site Representation, the following information is (as required) enclosed:
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- Red line plan.

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- Design and Access Statement
- Indicative Site Layout
- Transport Statement
- Bat Survey

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The Annex addresses the following issues, and is structured accordingly:
- Summary of the overall position adopted – as an executive summary of the case being made;
- Consideration of housing supply by the Plan, at the overall / plan-wide area;
- An Assessment of the Suitability of the Settlement for Development;
- An Assessment of the Suitability of Site for Development;
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- Requested / recommended changes to the Plan.

Given the detailed nature of these representations our client would be happy to discuss any aspect of the submission made and credentials of the site when your Authority (and the appointed Inspector in turn) comes to evaluate matters. Appearance at the Public Examination in due course is also considered necessary and beneficial.

We respectfully urge, for the reasons given herein and in the associated submitted information / supporting material, to allocate the sites put forward.

We look forward to hearing from you in due course. In the meantime we hope and trust that all is in order with this submission. Please do not hesitate to contact us in the event that further information is required or considered beneficial.

Enc’s:
Representation Details

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by: (No grouping)

Rep'n/Para/Policy   Representor   Agent   Accession No   Date Lodged   Late?   Source   Type   Mode   Status   Status Modified

- Completed Deposit LDP Response Form
- Representation Regarding Policy SP7 Green Wedges
- Representation Regarding Policy SP8 Special Landscape Area
- Representation Regarding Policy SP10 Residential Requirement
- Representation Regarding Policy H1 Housing Supply

- Site Location Plan
- Outline Planning Application submission
- Sustainability Appraisal
- Planning Note dealing with Amenity Issues

12  12 Speaking at Public Examination
To relay the findings of the detailed work undertaken and to put forward the issues contained within these representation

Item Question  Council Responses

2  2 Soundness of LDP

13  13 Council Response
The assessment of the site has concluded that the site is not suitable for allocation within the Plan. It is therefore not necessary for the site to be included within the housing chapter of the Plan. The site at the Former Poultry Plant, Castleton is outside of the settlement boundary and located in an area allocated as Green Wedge, Special Landscape Area and Countryside in the LDP. The Plan seeks to promote the reuse of Brownfield sites in preference to extensive use of Greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities. Part of the site is considered brownfield, where the poultry plant buildings stand. However, it is considered appropriate that the Green Wedge, Special Landscape Area and Countryside designations remain as the partial removal of isolated sites would undermine the purpose of those designations, namely the preservation of the open nature and character of the area.
## Representation Details

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**Rep'n/Para/Policy** | **Representer** | **Agent** | **Accession No** | **Date Lodged** | **Late?** | **Source** | **Type** | **Mode** | **Status** | **Status Modified**  
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**2070.L2/SP08** | AB Asset Management Ltd | Geraint John Planning | | 02/08/2013 | | E O I M |  
Additional material submitted | SA/SEA submitted

**Document:** Revised LDP, p.22  
**Policy:** SP08  
**Summary:** Objection to SP08 - plus addition of new Poultry Plant Site, Castleton

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Representation Details

Newport City Council Revised Local Development Plan: Deposit (June 2013)
Alternative Site Submission / Objection to the Plan

Chicken Processing Plant, Castleton

Please find enclosed, on behalf of and under instruction from AB Asset Management, representations to the Deposit LDP.

This submission:
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Yours faithfully
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#### Council Response

No change. The designation of Special Landscape Areas was assessed using the Landmap information system, as referenced in PPW, which is the data set used in the overall assessment undertaken using the Special Landscape Area Designation Criteria included within Natural Resources Wales’ guidance. The Local Authority did refine the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. This work looked at the proposed SLAs identified by the assessment of the Landmap data and did not seek to amend this nationally consistent data set. The area is allocated as part of the SLA3 Wentlooge Levels and this is based on the overall value of the landscape taking into account its qualities and features which have been deemed worthy of designation. Whilst it is recognised that part of the site has been developed it is not considered appropriate to remove part of the SLA. Piecemeal removal of parts of the designation would serve to undermine the designation, and would not be in accordance with the recommendations of the LANDMAP methodology.
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Document: Revised LDP, p.24

Policy: SP10

Summary: Objection to SP10 - plus addition of new Poultry Plant Site, Castleton

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Rep'n/Para/Policy     Representor                                                                      Agent              ...                               Accession No    Date Lodged    Late?   Source   Type    Mode     Status     Status Modified

11 11 Representation

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#### Speaking at Public Examination

To relay the findings of the detailed work undertaken and to put forward the issues contained within these representations.

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#### Item Question

- Soundness of LDP
  - Yes

#### Item Question

- Source
  - No
Justification of Requirement
Following representations at the Deposit LDP stage the housing requirement figure has been justified and increased from the proposed Welsh Government Population projections. There is scope for an authority to deviate from the WG population projections but this deviation is required to be well evidenced. The NLP assessment sets out this evidence base and illustrates that Newport, as one of the few areas in Wales with an anticipated population increase noted in the Census, is set to grow and reflects the Council’s policy aspiration for growth. It should be recognised that the majority of the sites (46 of 55) have planning permission or permission subject to a Section 106 agreement. This established supply with clear market intent illustrates not only that a growth strategy is appropriate but achievable.

As noted above, the Plan identifies its housing requirement for the plan period based on an assessment of need and this is also true of its employment land requirements. The clear strategy for the Plan is for growth and it will be through the successful implementation of the policies of the Plan that this will be achieved. There is a clear link between housing supply and economic growth which is why the supply will be monitored annually.

Reliance on previous Development Plan sites
The Local Development Plan does have a number of housing sites which were identified within the Unitary Development Plan. In total there are 15 of the 55 housing sites which continue into the new plan. The majority of these sites have progressed significantly from the UDP, as noted below:

1. Land adj. McReadys. As of 1st April 2013 the developer is on site preparing the site for development.
2. Eastern Expansion Area. Planning permission has been granted with a signed Section 106 agreement. Gallaghers Estates have confirmed through the JHLAS process that they will be delivering units on site in 2015.
3. Glebelands. This site has an extant planning permission associated with the school site adjacent to the residential area. The land has recently been sold to a developer.
4. Monmouthshire Bank Sidings. Redrow are on site and progressing.
5. Traston Lane. The site has planning permission and the agent has confirmed that they anticipate development on the site in 2015.
6. Pirelli. This site has been sold to the Seren Group (RSL) who launched the development in September 2013.
7. Ty Du Works. An application is being considered by the Council for a new scheme on the site.
8. Farmwood Close. This is an historic site with a LDC for the implementation of 10 units which have not been completed. The land is currently being marketed.
9. City Vision. The developer is on site and progressing.
10. Trinity View. The developer is on site and progressing.
11. Glan Llyn. The developer is on site and progressing. A third developer (St Modwen) are anticipating to being work on Phase 2 in 2015.
12. Mill Street. The site is owned by NCC who will market the site.
13. Herbert Herbert Road. This site is adjacent to the Glebeland site noted above. The site is compliant with the overall strategy of the LDP being a brownfield urban site in need of regeneration. There is no application on the site but the area land owner notes their intention to sell the site for development.
14. Whitehead Works. This site is part of a Welsh Government regeneration scheme, which anticipates delivery to begin in 2016.
15. Bideford Road. This site is compliant with the overall strategy of the LDP being a brownfield urban site with potential for regeneration. There is no application on the site but the area is the remaining part of a housing estate development.

The information above clearly shows that although there are a number of sites which have continued from one development plan to the other they have in the main progressed significantly or that they will be delivered within the plan period. It is also important to note that it was made clear through the UDP process that the growth proposed in the east of the city (i.e. Glan Llyn and Llanwern Village) was not anticipated to be delivered within the UDP plan period.

Deliverability and Supply
The Plan identifies its housing and employment land supply for the plan period which is based on an assessment of need. The clear strategy for the Plan is for growth and it will be through the successful implementation of the policies of the Plan that this will be achieved. There is a clear link between housing supply and economic growth which is why the supply will be monitored annually.

The Plan does however provide enough land to ensure that a 5 year supply is met and, that although the annual build rate is higher than currently achieved, even when taking into account the residual method of calculation the Council has provided an adequate supply of land which has been agreed with the industry through the JHLAS process.
Planning Policy Wales sets out the overarching requirement for development to be placed on brownfield sites in preference to greenfield sites. The plan allocates 82% housing units on brownfield sites terms that it has followed the search sequence criteria starting with the re-use of previously developed land and buildings within settlements which are located in areas accessible to jobs and services, where there is existing infrastructure and the scope to build sustainable communities.

The representation raises a concern that one of the reasons for a drop in housing delivery over the past few years is due to the lack of greenfield sites. This is not an accurate picture of the reality of housing supply in Newport. Brownfield sites are being delivered in the same economic environment as those greenfield sites with planning permission which do not have the same level of abnormal costs to consider.

As illustrated above the perception that the Plan is overly reliant on sites inherited from the UDP period is not well founded. In addition a number of the sites outlined by the developer as being undeliverable are in fact progressing e.g. Alcan. Not all the sites noted are counted as part of the housing supply due to the lack of evidence of deliverability e.g. Newport Athletic Club. The Council has been realistic in its approach to the housing supply set out in the Plan which is based on the annual JHLAS process to ensure that the sites can be delivered to ensure the strategy is met.

The rate of windfall sites is also questioned and as noted in Planning Policy Wales there is a need to consider the supply from such sites. The LDP based its figures on a review of the past trend of monitored as to the percentage of houses developed on allocated housing sites to ensure that the housing policies of the plan are being effectively implemented.

Range and Choice
The supply of housing is considered to provide for a clear range and choice of housing which is a clear concern for many representors. The housing sites within the Plan are located across the City, with a clear focus on regeneration in the east as per the established strategy. The Plan provides a supply of affordable units for a mixture of needs as well as providing a mix of family homes and inner city living to cater for the broad housing market. The opportunity to provide homes in more rural locations has been investigated and there was no clear evidence to justify expansion to existing settlements. The Plan therefore has provided the opportunity for exception sites where such justification can be produced.

Flexibility
As the representation notes there is no set flexibility figure required for housing supply within development plans. However, during the examination of the Brecon Beacons National Park LDP WG noted a notional figure of 10% but that needed to reflect local circumstances. Other authorities within South East Wales have a range of 12-20% flexibility. It is good practice to allow for unknowns and the need for flexibility within a development plan is inherent from National Planning Policy. In Newport’s case the majority of the housing supply has planning permission or is being progressed. Those remaining 9 sites without planning permission are in line with the overall strategy or regeneration needs of the plan. Together they provide a 12% oversupply which is considered appropriate to enable to plan to cope with uncertainties that may arise over the plan period.

Strategy compliance and delivery.
It is considered that the plan provides a more than adequate supply of housing, both market and affordable, which is both deliverable and viable. Many of the sites have progressed since the Revised Deposit Plan was written and there is a steady supply of housing being achieved across Newport. The Plan identifies its housing and employment land supply for the plan period based on an assessment of need. The clear strategy for the Plan is for growth and it will be through the successful implementation of the policies of the Plan that this will be achieved. There is a clear link between housing supply and economic growth which is why the supply will be monitored annually.

The work undertaken by NLP did consider the influence from Cardiff but the final recommended scenario did not take into account the potential cross-boundary issues with Cardiff that were highlighted by Edge Analytics as it does not take account of the recalibration that resulted in a substantial adjustment to the population projections for Newport. The reason for this is that it has not been possible to verify the analysis that informed the figures presented by Edge Analytics. This again points towards an upward pressure in the local housing requirements for Newport compared to the 2008 Welsh Government projections.

The proposed site is located adjacent to the settlement boundary within Countryside designation.

The plan seeks to promote the reuse of Brownfield sites in preference to extensive use of Greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities.

The forecast housing need has been assessed in the context of population and employment projections and current market realities. The plan allocates sufficient land to meet this requirement.
Additional housing allocations in a rural location cannot therefore be justified. Furthermore, the release of the representation site for housing would be contrary to the Council’s strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

The site does not reflect the underlying brownfield strategy for the plan and it is therefore recommended that this site is not included in the Local Development Plan for residential purposes.
### Representation Details

Filtering information: (all) Stage=L; Status=M

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Document: Revised LDP, p.65

Policy: H01

Summary: Objection to H1 - plus addition of new Poultry Plant Site, Castleton

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Additional material submitted
SA/SEA submitted
Alternative Site Submission / Objection to the Plan

Chicken Processing Plant, Castleton

Please find enclosed, on behalf of and under instruction from AB Asset Management, representations to the Deposit LDP.

This submission:
• puts forward an Alternative Site Representations; and
• objects to selected policy provisions of the plan.

For each Alternative Site Representation, the following information is (as required) enclosed:
• completed, signed and dated Deposit Plan Response Forms;
• Sustainability Appraisal;
• Red line plan.

Furthermore an outline planning application was recently submitted (and is yet to be determined) for the residential redevelopment of the site. A copy of the following supporting documents is also included as part of this submission:
• Planning Supporting Statement (and associated appendices)
• Design and Access Statement
• Indicative Site Layout
• Transport Statement
• Bat Survey

Furthermore, and as an Annex to this letter, a detailed case (providing a critique of the current provisions of the plan and suggested changes to its content) is included, in support of, and to make the case for the inclusion of the Alternative Sites; and suggested changes to the provisions of the Plan’s policies.

The Annex addresses the following issues, and is structured accordingly:
• Summary of the overall position adopted – as an executive summary of the case being made;
• Consideration of housing supply by the Plan, at the overall / plan-wide area;
• An Assessment of the Suitability of the Settlement for Development;
• An Assessment of the Suitability of Site for Development;
• A Summary of the Suitability of Sites for Development;
• Requested / recommended changes to the Plan.

Given the detailed nature of these representations our client would be happy to discuss any aspect of the submission made and credentials of the site when your Authority (and the appointed Inspector in turn) comes to evaluate matters. Appearance at the Public Examination in due course is also considered necessary and beneficial.

We respectfully urge, for the reasons given herein and in the associated submitted information / supporting material, to allocate the sites put forward.

We look forward to hearing from you in due course. In the meantime we hope and trust that all is in order with this submission. Please do not hesitate to contact us in the event that further information is required or considered beneficial.

Enc’s:

12/02/2014
Preface

This Annex sets out the detailed case in support of these representations.

It provides both a critique of the current provisions of the plan, and suggested changes to its content.

The representations are structured as follows:

- Summary of the overall position adopted – as an executive summary of the case being made;
- Consideration of housing supply by the Plan, at the overall / plan-wide area;
- An Assessment of the Suitability of the Settlement for Development;
- An Assessment of the Suitability of Site for Development;
- A Summary of the Suitability of Site for Development;
- Requested / recommended changes to the Plan.

Summary of Overall Position

An overview / summary of the position taken and evidence put forward by these representations is provided below:

- It is considered that the Plan’s overall supply for housing underprovides as opposed to overprovides – particularly as it is considered that the LDP’s proposed strategic brownfield strategy which concentrates development on large sites will unduly restrict the deliverability of housing, and raises significant doubts that the LPA will be able to deliver sufficient housing within each Phase of the Plan.
- The plan overestimating the speed in which development can be brought forward on a number of brownfield sites, and does not allow for a range and choice of sites to come forward as and when they are required. Accordingly, it is our view that the proposed primarily brownfield strategy concentrating on large sites should be amended to include a number of appropriate greenfield sites that are able to come forward in a timely manner in response to market demands.
- An additional ‘contingency’ of housing land supply should therefore be made to make allowances for a buoyant housing market and provide greater flexibility over the Plan period – which further makes the case for the need for additional housing allocations particularly on greenfield sites which are likely to be deliverable within the early periods of the plan.
- Residential development is in principle appropriate within Castleton, as the settlement has been assessed as being well provided for in terms of services and facilities.
- The proposed site is considered to be a suitable site for residential development, particularly in view of the following factors:
  - There are no economic constraints which will affect the development of the site within the plan period.
The landowner is in agreement with the proposed land use of the site.

The site is located within close proximity of frequent public transport services.

The site is accessible to local destinations on foot.

Castleton and Marshfield provide a range of services, amenity facilities, shops and services.

The development of additional residential units will further sustain the existing services within Castleton and Marshfield.

The site’s location provides an opportunity for residential development which would be neither prominent nor isolated.

Existing mature planting / hedgerows, could be maintained and / or supplemented.

The site is at no risk of flooding.

The proposed development is considered to be infill / rounding off development. In any event, the proposed development would replace existing built form on this brownfield site, and would therefore not result in any further intrusion into the countryside or the green wedge. The use of the site for residential purposes will enhance the residential amenity of the surrounding area.

The proposed development will generate less traffic than the existing lawful use of the site and would therefore result in a reduction in traffic volume using the access road.

In regards to the supply of housing land across the Authority, it is noted that the Revised Deposit Plan has increased the dwelling requirements from that provided within the Deposit Plan (April 2012). The dwelling requirement has therefore increased from 8,750 dwellings to 10,350 dwelling proposed within the Policy SP10 of the Revised Deposit Plan. This is welcomed as it is considered that the proposed figures were significantly lower than required, and would not meet the housing requirements of the area.

As outlined within the Assessment of Housing Requirements report (February 2013), prepared by Nathaniel Lichfield & Partners, it is noted that the proposed dwelling requirement has been based on an economic led scenario. This pro-growth requirement is supported as it will ensure that Newport is not significantly constrained by low housing supply and provides a more realistic picture.

However, it is noted that the proposed housing figures do not take account of potential cross-boundary issues. These issues were highlighted by Edge Analytics in their report which informed the Cardiff LDP, and estimate that Newport would have population growth of 18,500 people during the Plan period. As outlined in the NLP report:

"If the assumptions that have been made by Edge Analytics are correct, this means that Newport will continue to play a role in meeting Cardiff’s economic function and that this will create an upward pressure in the housing market over and above that associated with aspirations for growth within Newport itself – i.e. as housing is required to accommodate those people that move from Cardiff to Newport take advantage of cheaper house prices (as anticipated by Edge Analytics) and to achieve alignment with employment growth. (Paragraph 3.21)."

The Edge Analytics Report therefore provides for a sub-regional distribution of population growth, and the resulting Scenario D: Cardiff Adjustment provided in NLP’s report would provide for an overall dwelling requirement of 11,600 over the Plan period.

Having regard to the above, it is considered that the dwelling requirements proposed within the Revised Deposit Plan do not give enough consideration to the impact from Cardiff, and the likely population increase which will result. In order to account for this, it is therefore considered that the LDP’s dwelling requirement should be increased to 11,600 to ensure that Newport is able to accommodate the population increase and benefit from the associated economic growth.

Policy SP10 of the Deposit LDP indicates that over the plan period (2011-2026) sufficient land will be made available to provide for 10,350 dwellings. It is stated that the land to meet this requirement will be primarily previously developed / brownfield land. It is noted in paragraph 2.33 that the supply of housing land in the plan includes many sites that were identified in the previously adopted UDP – and because of their size, many of them have substantial parts which are not yet started.
Within Section 5 – Housing, it is noted that in terms of existing commitments, including sites subject to S106 agreements and site under construction, there appears to be a potential over provision in the number of plots to meet the identified dwelling requirement over the plan period.

Notwithstanding this, it is considered that there is a fundamental issue in terms of the deliverability of the housing strategy as a result of the focus on brownfield sites. Brownfield sites, as previously developed sites are likely to have greater site constraints with the potential need for site remediation works etc. Accordingly, brownfield sites can often have higher development costs and take longer to develop. Given the present economic climate there is a need for readily developable and economically viable sites to be identified.

Conversely, greenfield sites or smaller previously developed sites, which by their nature are likely to be less constrained, and therefore quicker to be brought forward for development within the early stages of the plan period, would balance out the likely delays in bringing forward development on the brownfield sites.

Despite the overprovision in plots which appears to exist it is considered that a primarily brownfield strategy will not allow the level of annual completions to be met in order to meet the housing need that has been defined.

Deliverability Issues with Primarily Brownfield Only Strategy

Table 5 within the Housing Background paper (June 2012) provides a detailed analysis of the relative number of completions between brownfield and greenfield sites in the last 5 years.

This demonstrates that generally housing completions have been falling on an annual basis. Whilst this is in part due to economic issues, it is considered that is a result of a lack of greenfield completions contributing to the overall figure as they have been falling on an annual basis – and in 2010/11 there was not 1 completion on a greenfield site.

It is noted that the UDP provided for the phasing of the allocated housing sites over three successive five year periods – 1996 to 2001, 2001 to 2006 and 2006 to 2011 (the UDP was also based on a strategy of primarily brownfield only sites). The table below provides an overview of the completions during each period against the target UDP requirement:

It is considered that the above table demonstrates that, although completions have actually increased over each of the 5 year periods, that due to the small number of greenfield site having been built out (as evidenced in Housing Background Paper) as a result of the strategic brownfield strategy this has resulted in the shortfall of housing completions which currently exists. This drop in completions over the last remaining years of the UDP is further evidence by the fact that in 2009 – 2012 on average there have been less than 400 completions per annum.

It is considered that all of the allocated housing sites are highly unlikely to come forward exactly as the phasing plan provides for, and that some sites timetabled for release early in the LDP period will be delayed.

In order to further demonstrate the over reliance upon brownfield sites, the following table provides an overview of the key strategic brownfield sites which were ‘allocated’ within the UDP and are now proposed to be included within the LDP – and the estimated units which will be delivered within the respective plan period.

In addition to this it is estimated that 495 units will come forward on the Lysaghts Village (Orb Works) over the LDP plan period.

The above table demonstrates that there are a significant number of units on current allocated brownfield sites which have not come forward over the UDP period (with the majority of these not having seen any development at all). The proposed ‘rolling forward’ of these allocations is not fundamentally contested, however should the majority of these key sites (allocated to meet the housing requirement) not come forward early within the LDP plan period the housing requirement will not be met.

In addition, as a number of the sites have seen little or no development over the UDP plan period, it is questioned whether these sites are all deliverable, and whether it is likely that all of these sites will now be able to come forward for development over the LDP Plan period. Indeed, it is noted that the vast majority of proposed LDP allocations are current allocations / commitments. As the Plan is focussed on such sites it is therefore critical that the deliverability of such sites is evidenced.

This issue is further evidence in the Joint Housing Land Availability Study (2010). This confirms that of a number of the brownfield site listed above a significant proportion of the units fall within category 3 (sites where development is unlikely within the next 5 years due to major physical constraints).
Of the sites that have been listed it is also questionable whether the number of units specified to be delivered by 2015 will come forward.

Accordingly, it is considered likely that the Authority will be “behind” in providing the required housing numbers before the end of the first phase of the LDP.

This is further confirmed by the 2012 JHLAS, which states that 8083 units are within category 3(i) and a further 613 are within category 3(ii). A total of 8696 units are therefore constrained, and therefore will not come forward for development within the next 5 years – which relates to 74% of the total proposed homes (of 11761 units). This therefore confirms that the majority of these sites are subject to major constraints, which will likely significantly delay the development of sites over the LDP period.

In view of this, it is considered that the LDP’s proposed strategic brownfield strategy will unduly restrict the deliverability of housing, and raises significant doubts that the LPA will be able to deliver sufficient housing within each Phase of the Plan. In particular, should only one or two housing sites be delayed in coming forward within the first 5 year periods of the Plan then the Authority will already fall behind in providing sufficient housing to provide for assessed needs.

This is considered to be particularly likely due to the Council’s reliance on / priority given to brownfield sites. Large strategic brownfield sites, in their nature, are likely to have more remediation and infrastructure needs resulting in higher development costs and greater potential for development delays. It is therefore considered likely that a number of the brownfield sites proposed for development, will not come forward during this time and/or will provide for lower numbers of units than is currently provided for. Accordingly it is considered that there is requirement to allocate a number of greenfield sites as part of the LDP in order to allow a more equitable and suitable approach in meeting the housing requirement over the plan period.

Infill Issue

It is noted that in the region of 15% of the Newport’s total dwelling supply over the plan period is comprised of potential development from windfall sites (513 units from small windfall sites less than 10 dwellings and 1013 units from large windfall sites more than 10 dwellings), which relates to approx 75 dwellings per annum. It is not considered sound that such a high percentage of the total housing supply relies on windfall sites coming forward for development, particularly in view of recent development rates on windfall sites

In 2009/10 the total number of dwellings that came forward through small sites was 33 units, in 2010/11 40 units came forward, 2011/12 35 units and only 14 in 2012 - as confirmed within the Housing Background Paper. Whilst it is noted that average levels (in the context of the LDP) of windfall development have historically been seen in Newport, it is not considered that this is a trend that is able to continue into the future. In particular, the key/most obvious windfall sites have already come forward and have been developed out over previous years, which has resulted in a smaller ‘pool’ of potential windfall sites being available. Therefore, as the levels of potential windfall sites significantly reduce, the rate of development on such sites is likely to slow dramatically, as developers find it harder to find suitable sites.

Furthermore in relation to small sites, the total number of completions in the last five years as a % of the overall number of completions has average 9%. On this basis alone the windfall allowance for small sites over the plan period would need to be in the region of 750 units – more than 200 higher than accounted for within the LDP.

Accordingly, based on these more recent trends, it is not considered that the housing provision on small windfall sites will be developed at anywhere near the level indicated in the LDP.

It is therefore considered that the LDP overestimates the levels of dwellings expected to come forward on windfall sites within the LDP, which is likely to result in an underprovision in the total dwelling supply. This over reliance on windfall sites will therefore restrict the ability of the LDP to provide for the housing needs of the local population. Accordingly this further establishes the need for the allocation of additional sites for residential development.

Summary

To summarise, it is our view that the Plan’s overall supply for housing underprovides as opposed to overprovides – an approach which is inconsistent with the drive to re-stimulate the housing market as a result – due to legitimate concerns about the ability of a number of allocated brownfield sites (which are likely to have greater site constraints) to deliver the required / allocated numbers of units (particularly in the early phases of the Plan period), which further makes the case for the need for additional housing allocations - particularly on greenfield sites which are likely to be deliverable within the earlier periods of the LDP.
The site is located within the current adopted UDP directly adjacent to the settlement limits of Castleton. Accordingly it occupies a position which is within close proximity to the existing settlement. Castleton, and Marshfield, within the Deposit LDP are identified as one of the 15 villages within the Authority.

Castleton has the following services and facilities:

- Police Station
- Church
- Petrol Filling Station and Shop
- Public House
- Hotel

In addition, Marshfield provides the following services and facilities:

- 2 Public Houses
- Local Shop
- Post Office
- Recreation Ground
- 3 Areas of Informal Open Space
- Community Centre

Accordingly, it is considered that collectively both settlements are well provided for in terms of services and facilities – at least in so far as providing and meeting ‘day to day’ needs and services relied upon by residents. The settlements are considered ‘self sufficient’ and ‘sustainable’ in this respect. It is therefore clear that additional residential development would, in principle, be appropriate within the settlement of Castleton.

It is considered that, in addition to being suitable for residential growth, additional housing development would assist in ensuring the continued viability of the existing shops and services within both the settlements, whilst also ensuring that a range of housing is available to provide for the housing needs of the local population.

Assessment of the Suitability of Site for Development

In assessing the suitability of the site for development a number of key issues need to be considered in detail.

The proposed site is located adjacent to the settlement of Castleton. The site currently comprises light industrial buildings which were built in the 1980’s. The previous use of the site was as a Halal chicken processing factory.

The northern and eastern boundaries are formed by mature trees and hedgerows. Immediately adjacent to these boundaries is agricultural land. The southern boundary is formed by agricultural land with the western boundary formed by the un-named access road which directly links with Marshfield Road to the west.

It is considered that the site is relatively well-placed (in comparison to many site’s within the locality in terms of its credentials for allocation with LDP for residential development), as detailed below:

- The site is located within close proximity to the existing settlements of Castleton and Marshfield (i.e. designated settlements within the UDP and Deposit LDP).
- Located adjacent to the site on Marshfield Road are bus stops providing NW-bound and S-bound services. The site is also located 640 metres south of the Castleton (SW-bound and NE-bound) bus services which provide regular and also direct services to Cardiff and Newport.
- The site is closely related to the existing settlement of Castleton. In light of the site’s location on the boundary of the settlement limit, and its enclosure by existing development / highways / mature landscaping on all boundaries, the development of the site would form a logical parcel of development adjacent to Castleton (and could be considered and presented as appropriate ‘rounding-off’ the existing settlement).
The uses undertaken at the sites are considered to be a bad neighbour development. The processes and uses undertaken at the site produced noise, fumes, heavy traffic generation, associated smells/discharges that are unsuitable for such a site in close proximity to residential developments. These are all issues that have been previously raised as part of the consideration of planning applications to intensify the use of the existing factory by both local residents and the local community council. The use of the site for residential development is considered to be more appropriate in the context of the surrounding area, in amenity terms, than the former use of the site. The amenity issues associated with the site are further outlined and evidenced in the planning note which is attached.

In light of the site’s sustainable location (and its brownfield, previously developed nature), residential development at this location would be inherently acceptable. The use of the site for residential development is considered to be more appropriate in the context of the surrounding area, in amenity terms, than the former use of the site. The amenity issues associated with the site are further outlined and evidenced in the planning note which is attached.

Considering the current permitted use of the site and the processes which were undertaken, there could quite plausibly be an intensification in the use of the site – and an intensification which would not necessarily require planning permission. This could be as a result of a change of ownership and operating procedures at the site or just an increase in the existing functions over and above the existing permitted use. Consequently due to the close proximity of the existing conflicting residential and industrial land uses the amenity of the existing residents could be further harmed.

The redevelopment of the site for residential purposes will therefore enhance the amenity of the surrounding area and will have a positive impact on surrounding land uses.

A Transport Statement has been prepared by Acstro Highways and Transportation for the planning application and provides an assessment of the highways and access position of the proposed application. The report accompanies this submission and therefore should be read in conjunction with this statement.

The report confirms that currently the site is a chicken processing plant and accommodates some 22,100m of industrial buildings. The assessment estimates that those buildings have the potential to generate around 82 daily vehicle movements with around 11 to 13 of those occurring within the peak hours. Of the 82 daily vehicle movements it is estimates that 11 would be HGV’s.

In terms of the proposed residential use, it is estimated that this will generate around 4 peak hour traffic movement and a total of 35 daily vehicle movements.

Accordingly, in terms of the traffic impact of the proposed development, the report confirms that the scheme will result in a reduction in the traffic generating potential of the site of between 4 and 8 peak hour traffic movements. This represents a reduction of between 50% and 70% in traffic compared with the existing use.

Daily traffic generation is estimated to reduce from 82 movements to 35 movements. Moreover the change in use of the land from its current industrial use to residential will entirely remove the potential of the site to generate regular daily HGV movements.

The assessment therefore confirms that the proposed development will result in a reduction in traffic volume using the access road and turning to and from Marshfield Road. The change of use of the site would remove the site’s current potential to generate regular HGV movements. The proposed development will therefore be positive in terms of reducing the volume and size of vehicle movements.

Furthermore, the site, which is located in Castleton, is within walking distance of a number of facilities available within the village and within the adjacent village of Marshfield. Those amenities are also accessible by bicycle and parts of Newport and Cardiff are within acceptable cycling distance to the application site. There are bus stops located at the development’s access and others on the A48 in Castleton. These provide access to a number of regular and frequent services that link the site to the centres of Newport and Cardiff. Accordingly, residents of the site would therefore not be reliant on the car to access services.

The report confirms that the private road that provides access to the site is 5.5m wide for the initial 50m length (measured from Marshfield Road). This allows two-way traffic to pass and ensures that opposing traffic at the junction with Marshfield Road does not block the access.

The access road then narrows to a width of 3.5 to 4m over the next 50m length. This is only sufficient for single file traffic. However the access road is straight and there is good visibility along it, allowing drivers approaching the single-file section to stop and wait for it to clear if there is an opposing vehicle already travelling along it.

The single file section of road provides adequate width for a car and pedestrians to pass one another safely.
There is at least 2.4 x 43m visibility available from the junction of the access road and Marshfield Road. This is appropriate for roads within 30mph speed limit areas.

The development will utilise the same access arrangement as the current land use. There are no changes proposed to the private access road that links the site to Marshfield Road. In view of the reduction of trips associated with the proposed use, the continued use of this access is considered to be both acceptable and appropriate.

Accordingly, in view of the above, the report concludes that there are no highway or transport related issues that should obstruct the allocation of the site for residential development. The proposed scheme is therefore considered to be acceptable in terms of highways and transport.

Assessment of Green Wedge / Special Landscape Designation

The purpose of the green wedge (primarily) and special landscape area is to prevent urban coalescence – however the ‘open’ nature of the green wedge would not be significantly altered by not including the garden / curtilage within the designation. Although part of the garden is located within the green wedge designation, in light of its positioning adjacent to the existing settlement and defensible boundaries, the land does not contribute substantially to the open nature of the green wedge.

The site currently comprises of brownfield / previously developed land, accommodating physically dominant built form i.e. in the form of the large / visually dominant factory. It is considered that the redevelopment of the site will enhance the visual appearance of the site to the benefit of the surrounding area.

The proposals seek to provide a sensitive and appropriate design which responds to and reflects its immediate surroundings and the existing built context. The detailed design of the proposed development, will be defined and agreed at the reserved matters stage, but will seek to ensure that a high quality scheme, which reflects, respects and improves the character and appearance of the area is provided.

The amount of development indicated on the illustrative layout is considered to be acceptable, appropriate and has been set in consideration of the size of the site, the viability of the scheme and density of the existing site context. The plan demonstrates that the properties work well in the context of the site, providing adequate amenity and privacy space, integrating and responding to the site context, whilst also utilising the site to its full potential.

The redevelopment of the site will benefit the surrounding area. The physical and landscape quality of the land and its proximity to the surrounding settlement is clearly indicated in the aerial photo of the site and its surrounds. As can be seen, the visual scar on the landscape brought about by the site and the activity associated with it is pronounced. It is clearly, unique in its appearance. The sensitive redevelopment of the site for housing presents the opportunity to assimilate this site into the surrounding landscape and would be in accordance with the recent comments made by the LPA and CCW to the Gypsy and Travellers site consultation.

Summary of the Suitability of Site for Development

As outlined above the proposed site represents a site which is considered to be suitable for residential development.

It is considered that the proposed redevelopment of the site for residential use is policy compliant, appropriate and acceptable. In view of the site’s non-conforming use as a poultry processing plant, and the site’s position as a brownfield site with physically dominant built form, it is considered that there are a number of material considerations which strongly support the development of the site for residential use:

• The proposed development of the site represents the beneficial re-use of a brownfield site in accordance with national local planning policy – and has the ability to sustain the communities of Castleton and Marshfield.

• The proposed development is considered to be infill / rounding off development. In any event, the proposed development would replace existing built form on this brownfield site, and would therefore not result in any further intrusion into the countryside or the green wedge.

• It is considered that the proposed development can be designed sensitively so as to ensure that the proposal utilises, and supplements existing screening surrounding the site – the proposal will therefore be well related to the surrounding area and improve the character of the green wedge and special landscape area.
• The proposal relates to a brownfield site, which currently consists of physically dominant built form. The proposed development would seek to provide an appropriate design response to this site which would provide a more sensitive design and scale of built form.

• It is considered that the application site is located within a sustainable location, situated within walking / cycling distance of local services and facilities, and well-served by public transport.

• The nature of the plants operation has inevitably resulted in noise and disturbance, raising amenity issues for the locality – it is considered that residential use is more suitably located on the application site in the context of this principally residential location.

• The use of the site for residential purposes will enhance the residential amenity of the surrounding area.

• The proposed development will generate less traffic than the existing lawful use of the site and would therefore result in a reduction in traffic volume using the access road.

• The proposed development is accessible by foot, bicycle and by public transport users. It is located in close proximity to a number of facilities and amenities provided in Castleton and Marshfield. Residents of the site would therefore not be reliant on the car to access services.

• There are no highway or transportation reasons that would preclude the proposed development of the site. The existing vehicular access to the site would adequately and safely serve the proposed development. The proposed development is therefore considered to be acceptable in highways terms.

Requested / Recommended Changes to the Plan

In light of, and as a consequence of these representations, the particular parts / policies of the Plan subject to these representations, and which are considered to need amendment are:

• Policy SP7 Green Wedges – Removal of the site from the green wedge designation.
• Policy SP8 Special Landscape Area – Removal of the site from the special landscape area.
• Policy SP10 Residential Requirement – Increase in the overall housing numbers (to reflect deliverability issues with brownfield sites) and allocation of appropriate greenfield sites to ensure that the needs of the Authority are provided for, and also to provide a higher ‘contingency’ for flexibility over the Plan period.
• Policy H1 Housing Supply – Increase in the overall housing numbers, including an increase in the contingency provision, and allocation of the proposed alternative site for residential development.

In addition, the Proposals Map of the LDP needs to be amended to include:

• The Alternative Site as a housing allocation (and within settlement limits)
• Removal of the site from the green wedge designation
• Removal of site from special landscape designation

It is respectfully urged that the Plan is amended accordingly to ensure its ‘soundness’.
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Comments made concerning policies SP7, SP8 and SP10 are dealt with under separate representations.

Justification of Requirement
Following representations at the Deposit LDP stage the housing requirement figure has been justified and increased from the proposed Welsh Government Population projections. There is scope for an authority to deviate from the WG population projections but this deviation is required to be well evidenced. The NLP assessment sets out this evidence base and illustrates that Newport, as one of the few areas in Wales with an anticipated population increase noted in the Census, is set to grow and reflects the Council’s policy aspiration for growth. It should be recognised that the majority of the sites (46 of 55) have planning permission or permission subject to a Section 106 agreement. This established supply with clear market intent illustrates not only that a growth strategy is appropriate but achievable.

As noted above, the Plan identifies its housing requirement for the plan period based on an assessment of need and this is also true of its employment land requirements. The clear strategy for the Plan is for growth and it will be through the successful implementation of the policies of the Plan that this will be achieved. There is a clear link between housing supply and economic growth which is why the supply will be monitored annually.

Reliance on previous Development Plan sites
The Local Development Plan does have a number of housing sites which were identified within the Unitary Development Plan. In total there are 15 of the 55 housing sites which continue into the new plan. The majority of these sites have progressed significantly from the UDP, as noted below:

1. Land adj. McReadys. As of 1st April 2013 the developer is on site preparing the site for development.
2. Eastern Expansion Area. Planning permission has been granted with a signed Section 106 agreement. Gallagher Estates have confirmed through the JHLAS process that they will be delivering units on site in 2015.
3. Glebelands. This site has an extant planning permission associated with the school site adjacent to the residential area. The land has recently been sold to a developer.
4. Monmouthshire Bank Sidings. Redrow are on site and progressing.
5. Traston Lane. The site has planning permission and the agent has confirmed that they anticipate development on the site in 2015.
6. Pirelli. This site has been sold to the Seren Group (RSL) who launched the development in September 2013.
7. Ty Du Works. An application is being considered by the Council for a new scheme on the site.
8. Farmwood Close. This is an historic site with a LDC for the implementation of 10 units which have not been completed. The land is currently being marketed.
9. City Vision. The developer is on site and progressing.
10. Trinity View. The developer is on site and progressing.
11. Glan Llyn. The developer is on site and progressing. A third developer (St Modwen) are anticipating to begin work on Phase 2 in 2015.
12. Mill Street. The site is owned by NCC who will market the site.
13. Herbert Road. This site is adjacent to the Glebeland site noted above. The site is compliant with the overall strategy of the LDP being a brownfield urban site in need of regeneration. There is no application on the site but the area land owner notes their intention to sell the site for development.
14. Whitehead Works. This site is part of a Welsh Government regeneration scheme, which anticipates delivery to begin in 2016.
15. Bideford Road. This site is compliant with the overall strategy of the LDP being a brownfield urban site with potential for regeneration. There is no application on the site but the area is the remaining part of a housing estate development.

The information above clearly shows that although there are a number of sites which have continued from one development plan to the other they have in the main progressed significantly or that they will be delivered within the plan period. It is also important to note that it was made clear through the UDP process that the growth proposed in the east of the city (i.e. Glan Llyn and Llanwern Village) was not anticipated to be delivered wholly within the UDP plan period.

Deliverability and Supply
The Plan identifies its housing and employment land supply for the plan period which is based on an assessment of need. The clear strategy for the Plan is for growth and it will be through the successful implementation of the policies of the Plan that this will be achieved. There is a clear link between housing supply and economic growth which is why the supply will be monitored annually.

The Plan does however provide enough land to ensure that a 5 year supply is met and, that although the annual build rate is higher than currently achieved, even when taking into account the residual
method of calculation the Council has provided an adequate supply of land which has been agreed with the industry through the JHLAS process.

Planning Policy Wales sets out the overarching requirement for development to be placed on brownfield sites in preference to greenfield sites. The plan allocates 82% housing units on brownfield sites with the remaining 18% of units on greenfield sites (these calculations excludes the completions, windfall and small sites supply figures). The LDP is therefore compliant with Planning Policy Wales in terms that it has followed the search sequence criteria starting with the re-use of previously developed land and buildings within settlements which are located in areas accessible to jobs and services, where there is existing infrastructure and the scope to build sustainable communities.

The representation raises a concern that one of the reasons for a drop in housing delivery over the past few years is due to the lack of greenfield sites. This is not an accurate picture of the reality of housing supply in Newport. Brownfield sites are being delivered in the same economic environment as those greenfield sites with planning permission which do not have the same level of abnormal costs to consider.

As illustrated above the perception that the Plan is overly reliant on sites inherited from the UDP period is not well founded. In addition a number of the sites outlined by the developer as being undeliverable are in fact progressing e.g. Alcan. Not all the sites noted are counted as part of the housing supply due to the lack of evidence of deliverability e.g. Newport Athletic Club. The Council has been realistic in its approach to the housing supply set out in the Plan which is based on the annual JHLAS process to ensure that the sites can be delivered to ensure the strategy is met.

The rate of windfall sites is also questioned and as noted in Planning Policy Wales there is a need to consider the supply from such sites. The LDP based its figures on a review of the past trend of windfall supply which has been drastically cut to reflect the need for the Plan to remain flexible whilst concentrating growth on allocated housing sites and tight settlement boundaries. The plan will be monitored as to the percentage of houses developed on allocated housing sites to ensure that the housing policies of the plan are being effectively implemented.

Range and Choice
The supply of housing is considered to provide for a clear range and choice of housing which is a clear concern for many representors. The housing sites within the Plan are located across the City, with a clear focus on regeneration in the east as per the established strategy. The Plan provides a supply of affordable units for a mixture of needs as well as providing a mix of family homes and inner city living to cater for the broad housing market. The opportunity to provide homes in more rural locations has been investigated and there was no clear evidence to justify expansion to existing settlements. The Plan therefore has provided the opportunity for exception sites where such justification can be produced.

Flexibility
As the representation notes there is no set flexibility figure required for housing supply within development plans. However, during the examination of the Brecon Beacons National Park LDP WG noted a notional figure of 10% but that needed to reflect local circumstances. Other authorities within South East Wales have a range of 12-20% flexibility. It is good practice to allow for unknowns and the need for flexibility within a development plan is inherent from National Planning Policy. In Newport’s case the majority of the housing supply has planning permission or is being progressed. Those remaining 9 sites without planning permission are in line with the overall strategy or regeneration needs of the plan. Together they provide a 12% oversupply which is considered appropriate to enable to plan to cope with uncertainties that may arise over the plan period.

Strategy compliance and delivery.
It is considered that the plan provides a more than adequate supply of housing, both market and affordable, which is both deliverable and viable. Many of the sites have progressed since the Revised Deposit Plan was written and there is a steady supply of housing being achieved across Newport. The Plan identifies its housing and employment land supply for the plan period based on an assessment of need. The clear strategy for the Plan is for growth and it will be through the successful implementation of the policies of the Plan that this will be achieved. There is a clear link between housing supply and economic growth which is why the supply will be monitored annually.

The work undertaken by NLP did consider the influence from Cardiff but the final recommended scenario did not take into account the potential cross-boundary issues with Cardiff that were highlighted by Edge Analytics as it does not take account of the recalibration that resulted in a substantial adjustment to the population projections for Newport. The reason for this is that it has not been possible to verify the analysis that informed the figures presented by Edge Analytics. This again points towards an upward pressure in the local housing requirements for Newport compared to the 2008 Welsh Government projections.

The site at the Poultry Plant is located adjacent to the settlement boundary within Countryside designation.

The plan seeks to promote the reuse of Brownfield sites in preference to extensive use of Greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities.
The forecast housing need has been assessed in the context of population and employment projections and current market realities. The plan allocates sufficient land to meet this requirement. Additional housing allocations in a rural location cannot therefore be justified. Furthermore, the release of the representation site for housing would be contrary to the Council's strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council's strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

The site does not reflect the underlying brownfield strategy for the plan and it is therefore recommended that this site is not included in the Local Development Plan for residential purposes.

The assessment of the site has concluded that the site is not suitable for allocation within the Plan. It is therefore not necessary for the site to be included within the housing chapter of the Plan. The site at the Former Poultry Plant, Castleton is outside of the settlement boundary and located in an area allocated as Green Wedge, Special Landscape Area and Countryside in the LDP. The Plan seeks to promote the reuse of Brownfield sites in preference to extensive use of Greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities. Part of the site is considered brownfield, where the poultry plant buildings stand. However it is considered appropriate that the Green Wedge, Special Landscape Area and Countryside designations remain as bit part removal of isolated sites would undermine the purpose of those designations, namely the preservation of the open nature and character of the area.
### Representation Details

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*Document: Revised LDP, p.65
Policy: H01
Summary: Allocate land at Glochwen, Rhiwderin for residential use.*

Additional material submitted - Please click here

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Glochwen, Rhiwderin.
1.0 Introduction

1.1 Newbridge Estates Ltd objects to the omission of the land Glochwen, Rhiwderin as a residential allocation from within Policy H1. The land concerned is shown on the attached plan.

1.2 Omission of this land from the housing allocations results in the Deposit Local Development Plan being unsound in terms of the following tests:
- BC2 in that the housing allocations are not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales;
- CE2 in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base in terms of future housing needs; and
- CE4 in that omitting the site from the housing allocations does not provide a reasonable level of flexibility to allow the Deposit Plan to deal with a higher housing requirement to meet local needs.

2.0 Site Description

2.1 The 8.8ha site is situated immediately adjoining the settlement boundary for Newport at Rhiwderin which is located approximately 5km to the west of Newport City Centre. The site lies to the northwest of Bassaleg, between the A467 and River Ebbw to the north east and the A468 to the south.

2.2 The site comprises a number of fields which are currently used for grazing. To the south the site adjoins the existing residential development at Harlech Drive, whilst to the west it adjoins the recently developed Taylor Wimpey housing site (Gerddi Rhiwderin) and the new allotments. To the north the site adjoins further fields which contain a Schedule Ancient Monument (SAM) comprising of an earthwork mound marking the location of an Iron Age Fort and to the east the River Ebbw, beyond which lies the former Alcan site.

2.3 Rhiwderin has a community centre, a newsagent, post office, place of worship and a public house all within 500m to the west of the site, along with a children's equipped area of play and allotments at Chapel Terrace. There are also regular bus services close to the site providing links to Newport Bus Station as well as other inter urban bus services to surrounding towns including Caerphilly, Ystrad Mynach, Bargoed and Cardiff.

3.0 Compliance with Deposit LDP

3.1 The acceptability of the site for inclusion within the housing allocations set out in Policy H1 and its compliance with the policy of the Deposit LDP are identified in separate submissions as briefly outlined below:

Housing Requirement

3.2 As detailed within the separate submissions made in relation to Policy H1 - Housing Sites there is clear need to provide further residential allocations. It is noted that due to concerns over deliverability of some of the proposed allocated sites as well as the requirement to meet local needs as set out within the Local Housing Market Assessment the housing land supply is inadequate to meet the identified 10,350 dwellings.

3.3 Therefore, it is evident that appropriate new housing allocation sites will be required to provide land which is immediately available and within a sustainable location. In the case the site at Glochwen would actively assist in providing a deliverable housing site to address the identified shortfall.

Settlement Boundary

3.4 As detailed within separate representations made on Policy SP5 - Countryside, it is wholly appropriate for the modest extension to the settlement boundary at Rhiwderin. This extension will assist to accommodate additional housing development in order to provide a greater degree of flexibility within the plan to accommodate growth overall.

Special Landscape Area

3.5 Within separate representations made in relation to Policy SP8 - Special Landscape Areas it is recommended that the site be removed from the West of Rhiwderin Special Landscape Area and that the boundaries be revised given the sites characteristics and suitability for development.

4.0 Development Framework Document

4.1 In considering the above policies and in order to assist with establishing the most appropriate sites for further residential development a supporting Development Framework Document has been prepared for the site at Glochwen, Rhiwderin.

4.2 The Development Framework Document incorporates the results of a broad ranging assessment of environmental and other matters. It outlines the proposed development concept which responds to the assessments carried out and provides a masterplan to illustrate that the development of the site provides a logical choice for approximately 137 dwellings. It is therefore evident that the
The development of the site will seek to meet the housing need through the Development plan period within the sustainable settlement location.

### 5.0 Required Change

#### 5.1 That the land at Glochwen, Rhiwderin is allocated for housing development within Policy H1 as a new site for 137 dwellings in order to meet the needs of the local community.

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**Item Question**

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The response to comments made on Policy H1 Housing Provision can be viewed against representation 2072.L4
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Document: Revised LDP, p.21
Policy: SP05

Summary: Amend the countryside designation to remove land at Glochwen, Rhiwderin.

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**Item Question**  **Representation Text**
1.0 Introduction

1.1 Newbridge Estates Ltd objects to the inclusion of land at Glochwen within the Countryside and the omission from within the settlement boundary of Rogerstone. The land concerned is shown on the attached plan.

1.2 Omission of this land from the settlement boundary results in the Deposit Local Development Plan being unsound un terms of the following tests:
- C2 in that the settlement boundary is not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales;
- CE2 in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base in terms of future housing needs; and
- CE4 in that the restrictive settlement boundary does not provide a reasonable level of flexibility to allow the plan to deal with future circumstances.

2.0 Amplification Housing Requirement

2.1 As detailed within the separate submission made in relation to Policy H1 - Housing Sites there is clear need to provide further residential allocations. It is noted that due to concerns over deliverability of some of the proposed allocated sites as well as the requirement to meet local needs as set out within the Local Housing Market Assessment the housing land supply is inadequate to meet the identified 10,350 dwellings.

2.2 Therefore, it is evident that appropriate new housing allocation site will be required to provide land which is immediately available and within a sustainable location. In this case the revision to the settlement boundary at Rogerstone to incorporate the site at Glochwen would actively assist in providing a deliverable housing site to address the identified shortfall.

Planning Policy Wales

2.3 In the context of the requirement for additional housing sites it is evident that there is a need to allow greater flexibility with the settlement boundary and seek to allocate further housing sites at appropriate locations.

2.4 As part of a sound plan, local Planning Authorities, in identifying sites to be allocated for housing should have regard to the principles of the search sequence as outlined within Paragraph 9.2.8 of Planning Policy Wales (2012 5th Ed). The paragraph outlines that Authorities should start with the reuse of previously developed land and buildings within settlements, then settlement extensions and then new development around settlements with good public transport links.

2.5 Given that a number of the existing allocated sites are on previously developed land and are constrained the Authority should seek to allocate sites within logical settlement extensions as per the next stage within the search sequence.

2.6 In doing so regard should be had to paragraph 9.2.9 of PPW which provides relevant criteria which Local Planning Authorities should consider in deciding which sites to allocate for housing.

2.7 The characteristics and locations of the site at Glochwen accords with the relevant criteria in order to provide a sustainable settlement extension:
- The site immediately adjoins the settlement boundary of Rhiwderin and is subject to urban influences;
- The extension of the settlement to provide residential development would wholly compatible with the neighbouring established land uses;
- Development of the site is not constrained by physical or environmental issues;
- The site is accessible to jobs, shops and services by modes other than the car, and
- The site is located where the capacity of existing and potential infrastructure, including public transport, water and sewerage, other utilities and social infrastructure, are available.

2.8 The principles and criteria as set out in Planning Policy Wales have been taken into consideration with the preparation of a Development Framework Document.

3.0 Development Framework Document

3.1 In order to assist with establishing the most appropriate settlement extension sites a Development Framework Document to support the site at Glochwen as a housing allocation site and the consequent inclusion within the settlement boundary of Rhiwderin has been prepared.

3.2 The Development Framework Document incorporates the results of a broad ranging assessment of environmental and other matters. It outlines the proposed development concept which responds to the assessments carried out and provides a masterplan to illustrate that the development of the site can contribute to meeting the housing need through the Development Plan period within the
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**4.0 Required Change**

4.1 That the site at Glochwen be removed from the Countryside and the settlement boundary for Rhiwderin be amended to include land to the as shown on the attached plan.

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### Item Question Council Responses

**13 13 Council Response**

No change. The site is a Greenfield site, which is positioned outside of the urban settlement (with the exception of a small area on the western edge of the site). The site is part of the SLA 2 - West of Rhiwderin, having scored a high value in the LANDMAP assessment.

The forecast housing need has been assessed in the context of population and employment projections and current market realities. The plan allocates more than sufficient land to meet this requirement. Additional housing allocations in rural locations cannot therefore be justified. Furthermore, the release of the site for housing would be contrary to the Council’s strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

In addition, the plan seeks to promote the reuse of Brownfield sites in preference to extensive use of Greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside is considered that the sites allocated allow flexibility and a range and choice of types of housing, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities.

A background paper 'Delivery and Implementation' has been produced to expand on the information supplied in Chapter 13 of the Deposit LDP. This sets out the proposed phasing, constraints and infrastructure requirements for each allocation. The Deliver of each site is considered here, setting out the justification for its continuation in the plan based on evidence from developers and landowners. Some of the large brownfield sites allocated within the previous Unitary Development Plan have started construction e.g. Glan Llyn with 4000 homes and employment uses on the site. The impact on development by the economic recession is to be considered and the plan takes a long term view across the entire plan period.

The LDP sets out a strategy for growth which allocates an adequate supply of land for residential and employment uses. The supply of this land is not concentrated in one area but across the City. It is recognised that growth in the east is significant but the west has not been overlooked with large brownfield sites allocated at Novelis, former Whitehead Works and Monmouthshire Bank Sidings. The review of village boundaries has clearly considered the need for expansion in these areas and following their assessment boundaries have been tightened and allocations resisted due to the unsuitability of sites proposed in these unsustainable locations.

It is therefore recommended that the site is not included in the Local Development Plan as it is not needed in housing requirement terms and would be contrary to the LDP Strategy and should remain allocated as countryside.
## Representation Details

**Document:** Revised LDP, p.22  
**Policy:** SP08  
**Summary:** Amend the SLA boundary on land at Gloch Wen, Rhiwderin.

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Glochwen, Rhiwderin.
1.0 Introduction

1.1 Mrs H E Murray objects to the inclusion of land at The Griffin within the Tredegar Park Special Landscape Area designation. The land concerned is shown on the attached plan.

1.2 Inclusion of this land within the Tredegar Park Special Landscape Area results in the Deposit Local Development Plan being unsound in terms of the following tests:

- CE1 the proposed Special Landscape Areas do not provide a coherent approach to designation;
- CE2 in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base; and
- CE4 in that the Special Landscape Area does not provide a reasonable level of flexibility to allow the plan to deal with future circumstances.

2.0 Amplification LANDMAP Designation

2.1 Firstly the use of the LANDMAP information system in determining potential SLAs within Newport is driven by Planning Policy Wales (2012 5th Ed) in which paragraph 5.3.13 states that LANDMAP

“…can help to inform supplementary planning guidance on landscape assessment (covering for example, local distinctiveness, special landscape areas and design)”.

2.2 However, in reviewing the SLA Background Paper it is evident that the LANDMAP data appears to have been the main justification for the recommended location, extent and boundaries of the proposed SLAs. Whilst Planning Policy Wales states that the data should 'help to inform' supplementary planning guidance, in the case of the proposed Newport SLAs the Authority have relied upon the data rather than be informed by it.

2.3 In considering the above it is questioned as to whether all landscapes within the proposed designated areas are worthy of equal protection. One of the strategic criteria and tests for SLA designation stated in LANDMAP Information Guidance Note 1 is 'coherence'. This is taken to mean that the boundaries of proposed SLAs should contain within them landscapes of distinctive unit exhibiting characteristics worthy of protection by virtue of their special qualities, distinctive features or rarity. It is therefore unclear as to how the test for coherence, as required in the guidance, can be satisfied across the relatively large land areas covered by the SLAs.

2.4 Concern is also raised in relation to the definition of boundaries. The TACP Report - Designation of Special Landscape Areas (2009), which is appended to the Background Paper, highlighted the need for the subsequent confirmation of the detailed boundaries by the Authority.

2.5 In this regard paragraph 5.2 of the SLA Background Paper states that “The proposed SLA boundaries for the LDP are justified as being located either: along Newport Authority's administrative boundary, the proposed settlement boundary from the LDP or along structures, such as motorways, railways, rivers or canals, the edges of large woodlands or hedgerows. This ensures a consistent and clearly defined boundary line which will ensure future use of the allocation is unambiguous”.

2.6 However, whilst some further work has been undertaken it is evident that in order to provide a consistent approach the Authority have defaulted to the use of the settlement boundaries. While in some instances edge of settlement may be justified as the boundary in special landscape terms, in the majority of cases, it appears to be used without regard to landscape quality and adjoining influences.

2.7 We consider that far more scrutiny of SLA boundaries is needed to exclude those landscapes that lack special qualities, distinctive features or rarity, and to re-draw the boundaries as so to include only those landscapes worthy of protection by virtue of their special status.

3.0 Special Landscape Area Boundary

3.1 Of significant concern is that the SLA designation relates to land to the west of Rhiwderin and the land at Glochwen lies to the east. Clearly there is a difference in the character and locations which would support the removal of the site from the West of Rhiwderin SLA.

3.2 This is further supported by a landscape and visual assessment of the area, undertaken by Soltys Brewster, which links to the above comments on the LANDMAP assessment and subsequent concerns over the definition of the boundaries proposed by the Authority.

3.3 The landscape assessment of the wider surrounding area by Soltys Brewster, based on a previous landscape and visual work undertaken for the application and appeal at Glochwen, Rhiwderin,
comprising of fieldwork and desk-based study previously identified five general landscape character areas contained within and surrounding the site. Of the five character areas identified it was concluded that the site, adjoining the settlement boundary of Rhiwderin, falls mainly within the Valley Sides which is characterised by and comprises of both urban and rural landscapes and contains the transitional urban rural fringe zones. Therefore, the site at Glochwen and surrounding area within the Valley Side classification are subject to urban and human influences and whilst they may have some local intrinsic interest through their mature networks of hedgerows, hedgerows trees and woodland copse it is considered that these landscapes are generally of Medium quality, and do not warrant a Special Landscape Designation.

3.4 In considering the above it is therefore unclear whether all landscapes within the proposed designated area are worthy of equal protection and that a more detailed assessment of the boundaries should be undertaken rather than default to the settlement boundary.

Required Change:
4.1 That the site at Glochwen be removed from the West of Rhiwderin Special Landscape Area.

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<td>13</td>
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Due to the significant issues raised in the attached representations.

No change. The designation of Special Landscape Areas was assessed using the Landmap information system, as referenced in PPW, which is the data set used in the overall assessment undertaken using the Special Landscape Area Designation Criteria included within Natural Resources Wales’ guidance. The Local Authority did refine the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. This work looked at the proposed SLAs identified by the assessment of the Landmap data and did not seek to amend this nationally consistent data set. The area at Gloch Wen is allocated as part of the SLA2 West of Rhiwderin and this is based on the overall value of the landscape taking into account its qualities and features which have been deemed worthy of designation.
Newport City Council Local Development Plan

Representation Details

by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M

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Document: Revised LDP, p.65
Policy: H01
Summary: Inadequate housing land supply therefore allocated land at Glochwen, Rhiwderin for housing.

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Glochwen, Rhiwderin.
1.0 Introduction

1.1 On behalf of Newbridge Estates Ltd, we object to the approach taken by the Deposit LDP towards housing supply.

1.2 In the first instance, we welcome the Council's acceptance that the housing requirement must be considerably higher than envisaged in the previous Deposit version of the LDP. Indeed this represents a step change in the position at Newport and is important to the future economic and social well being of the City. This inevitably places a far greater emphasis on the delivery of sites for housing otherwise there will be far reaching implications for the City and its residents.

1.3 We are seriously concerned that whilst the requirement has significantly increased, the housing land supply has remained largely the same as within the earlier version of the LDP. Indeed, the strategy remains reliant upon dwellings being provided at sites that are subject to a range of constraints and have historically failed to deliver. PPW (9.2.3) is clear that "sites must be free, or readily freed, from planning, physical and ownership constraints, and economically feasible for development, so as to create and support sustainable communities where people want to live. There must be sufficient sites suitable for the full range of housing types."

1.4 We do not consider that the supply proposed complies with these fundamental requirements. Indeed, the failure of constrained sites to deliver would have significant consequences on the Local Area. Given that it is the Welsh Minister's main priority to deliver housing, it is our view that greater emphasis must be placed on ensuring a deliverable and implementable supply of land for housing rather than continued reliance upon sites that have remained undeveloped over successive plan periods.

1.5 Based on our consideration of the Plan in relation to National Policy requirements, it is our view that the proposed Focussed Changes made in relation to the above are contrary to the following tests of soundness:

-CE2 in that the housing strategy is not sufficiently robust or flexible to ensure compliance with national policy as set out in Planning Policy Wales. There is no flexibility to deal with the failure of sites to be brought forward for development;
-CE3 in that the proposed housing provision strategy and employment requirement does not flow logically from the proposed strategy of the plan and are not related to each other;
-CE4 in that restricting the level of housing available during the plan period does not provide a reasonable level of flexibility to allow the Plan to deal with higher population, employment growth and household growth and to meet local needs.

2.0 Land Supply Analysis

It is our view that there are numerous and significant weaknesses within the housing land supply that go to the heart of the Plan and render it unsound, in summary these are:

Housing Land Supply

In the first instance we draw attention to the under provision of housing during the UDP period (c. 360 dwellings) and secondly to the shortfall to date (April 2011 to April 2012 - 24 months) in the LDP period. Just 12 years into the LDP period based on these matters there is already a cumulative under provision of over 1,100 dwellings. Absent a significant source of readily available land for development it is likely that this level of under provision will increase as the same sites are relied upon for the LDP.

2.3 Given that the housing requirement has significantly increased and there are no material changes to the land supply position. If the 2012 JHLAS were re-run in the basis of the LDP requirement, then the land supply would decrease to less than five years.

Sites subject to constraints

We note that there are a number of sites that are subject to constraints yet are relied upon by the LDP. Indeed, these sites are vital to the delivery of the LDP but have been in the JHLAS for considerable time with no sign of development, some are categorised as 3(i) due to constraints, some are apartments for which there is limited demand and others are simply not viable for development. In addition there are a number of sites which are subject to the signing of a section 106 agreement which has constrained delivery for some time. We do not believe that these sites can be relied upon in order to contribute towards the housing requirement.

2.5 The following sites are examples of the inherent problems within the supply:

Site
1. Adjacent to Mcready's 54
2.6 We have serious concerns over the ability of the Llanwern site to be developed at the level envisaged within the plan (i.e. contributing over 2,748 dwellings during the plan period). Indeed, historically, there have been numerous delays that have continually postponed development and it is plainly not contributing the level envisaged in the latest JHLAS.

2.7 Indeed, we believe that based on present evidence if the overestimation persists, then the site will deliver at least 1,000 dwellings fewer than the level envisaged. This represents a major threat to the soundness of the plan.

Range and Choice
2.8 We note that National Guidance contained within PPW (5th Edition) requires that LDPs to provide a range of and mix of house types in places where people want to live. The present strategy is predicated upon large brownfield sites in and around the city centre and to the east of the City. This fails to consider the smaller scale needs of existing communities around the city and the desire of local people to continue to live within existing communities rather than as part of larger brownfield regeneration schemes in less attractive parts of the City.

Sites subject to s106
2.9 We do not consider that those sites that are subject to s106 can be relied upon to contribute during the plan period.

Windfall Allowance
2.10 There is presently reliance upon a significant number of windfall sites being brought forward. We note however, that a significantly number of the constrained land supply within the various tables are themselves windfall sites that have remained and subsequently become allocated but undeveloped. Accordingly, we believe that caution must be exercised in the contribution that such sites will make.

Flexibility allowance
2.11 Given the fundamental problems with the land supply identified and shortfall that it will result in, it is of fundamental importance that a flexibility allowance is identified. Indeed, in its present form the strategy lacks any flexibility to deal with the large number of constrained sites not being brought forward.

2.12 It is our view that in light of the significant problems identified, the contingency should be in line with the level of flexibility within the previous version of the LDP.

3.0 Consequences of failing to provide an adequate housing supply

3.1 As noted, the Strategy in its present form lacks any flexibility to deal with the failure of a small number of large sites to come forward. Given the known constraints and historic under-delivery, it is important that the sufficient housing is identified. Indeed, the consequences of the failure of the housing supply to meet requirements will be far reaching and undermine future aspirations for Newport.

3.2 Hardisty Jones Associates (HJA) have prepared an analysis on behalf of Newbridge Estates Ltd on the consequences of the failure of the housing land supply to be realised. They have based their considerations on the Assessment of Housing Requirements report prepared by Nathaniel Licfield and Partners for Newport City Council.

3.3 Both the Newport Community Strategy and Local Housing Strategy set out an ambition to see Newport as a prosperous and thriving city. The Revised LDP has a vision of a lively, dynamic, growing City. The delivery of sufficient housing is central to achieving these visions in a sustainable manner, as set out within the LDP and the supporting NLP report (Assessment of Housing Requirements, February 2013, NLP). Indeed, the NLP report makes multiple references to the need to align housing and economic objectives in order to deliver and enable a sustainable and sound LDP, including:

"Alignment of housing and economic policy objectives is essential to ensuring sustainable development and support for growth [alternative lower growth scenarios] fail to reflect the level of economic growth that is forecast and, as such, would compromise the deliverability of the economic vision for the area" [para 3.22, NLP].

"This consistency between employment and housing policies will be important in ensuring that the Plan can be found to be sound" [para 3.28, NLP].

"To achieve balanced and well-distributed growth, economic policies must align with policies seeking the future development of houses in the area" [para 3.23, NLP].

3.4 Plainly the failure to deliver sufficient housing within Newport over the LDP period has implications for economic, social and environmental sustainability.

Economic Sustainability

3.5 Firstly, there will be a reduction in the scale of economic and employment growth achieved in Newport over the LDP period if lower levels of housing than planned are delivered. Paragraphs 1.18 and 1.27 of the Revised LDP note there is a direct relationship between job creation in the construction sector and the building of houses. Without sufficient activity there will be an impact on the potential to achieve 7,400 jobs over the plan period.

3.6 Secondly, on a more general level, there is an important relationship between the provision of housing, the growth of the workforce and the attraction and achievement of economic growth. As NLP note:

"...the delivery of sufficient housing for the (expanding) workforce represents an essential element in ensuring that economic growth can be attracted and sustained."[para 3.23, NLP]

3.7 Thirdly, and related to the second point above, there will be implications for the sustainable supply of labour without sufficient housing to attract and retain a population of working age. The NLP report highlighted the importance of positive net-migration to provide an appropriate demographic structure to support sustainable growth:

"Migration can be considerable benefit for the social and economic well-being of an area. It helps to ensure that the area benefits from a balanced mix of people of all age groups, including those of working age that are able to work within the local area. As such, it can contribute towards a more balanced and economically functional society. It is important to acknowledge these benefits and to respond to them by making adequate provision for the future needs of migrants, including housing."[para 3.8, NLP]

"Taking account of the assumptions that have been made (and tested) regarding unemployment, economic activity and commuting, it is evident that if NCC is to deliver its growth aspirations then it will be essential to plan for and provide for net inward migration"[para 3.9, NLP].

3.8 In order to secure the economic ambitions of the LDP and wider policy and strategy documents for Newport there is a need to deliver sufficient housing.
Social Sustainability

3.9 There are two important elements of social sustainability related to housing provision.

3.10 Firstly, a failure to provide sufficient housing will hinder the formation of new households and/or limit the housing choices available to new households. This can happen in a number of ways. Directly, insufficient housing limits the number of households that can be accommodated in the city. Indirectly, it can lead to increases in house prices as demand outstrips supply, limiting access to housing that is affordable. The implications will vary from case to case, but may force homebuyers to look further afield, away from friends and family and with commensurate implications on travel to work (see below), or may lead to households failing to form, for example young people in their twenties and thirties continuing to reside within the parental home. All of these outcomes have social implications and restrict opportunities.

3.11 Secondly, a lower provision of housing will impact upon the level of affordable housing that can be delivered in the city over the plan period. The Newport Community Strategy sets out a need to deliver affordable housing as part of its vision to ensure opportunities for all. This is set against an historic backlog in terms of affordable housing deliver, with the NLP report indicating a "significant unmet housing need in Newport" [para 3.33 bullet 6, NLP].

Environmental Sustainability

3.12 Without an adequate locally resident workforce employers will be reliant upon commuters to fill vacancies. This will put pressure on transport infrastructure and, given the ongoing reliance on the private motor car, is likely to lead to less environmentally sustainable outcomes. The NLP report states that:

"...if the housing requirement was set to reflect the demographic scenarios alone, then there is a risk that the housing and employment elements of the LDP would not be joined up and the economic growth that is anticipated would be reliant upon a substantial increase in commuting into the area, if it was to be achieved. Such an approach would not be sustainable and would raise fundamental questions regarding the soundness of the resultant strategy."[para 4.9, NLP]

3.19 In conclusion therefore it is vital that housing and employment is aligned in policy, and that in addition, housing is delivered in order to enable the sustainable economic growth that is so necessary. Indeed, this similar conclusion is reached by NLP in its advice to the Council:

"Alignment of housing and the economy is therefore essential to ensuring sustainable development and support for growth...the delivery of sufficient housing for the (expanding) workforce is essential to ensuring that economic growth can be attracted and sustained ..."[para 4.11, NLP]

4.0 Required Change

4.1 It is considered that to make the plan sound additional land will be required to be identified for housing. To that extent the land at Glochwen, Rhiwderin is considered acceptable to accommodate some of the required shortfall. It is readily available, free from constraints and related to an existing sustainable community where people want to live.

4.2 The supporting Development Framework Document which has been prepared in relation to Glochwen has summarised the technical reports and information which has been prepared to support the allocation as a logical choice for housing for approximately 137 dwellings.

4.3 It is evident from the assessments undertaken as part of the Development Framework Document and the separate submissions made to the Deposit LDP in regards to Policy SP5 - Countryside, H1 - Housing Site (Allocation) and SP8 - Special Landscape Areas, that there are no overriding constraints to the development of the site. Furthermore given that the site is without contamination issues and large infrastructure requirements it is immediately available and would assist Newport in providing short term sites to provide for Newport's immediate housing needs as detailed above.

4.4 Taking this into consideration an appropriate masterplan has been prepared as part of the Development Framework Document to illustrate the development opportunities and benefits which can arise and to demonstrate that an allocation at Glochwen within the settlement of Rhiwderin is deliverable. In this regard the allocation at Glochwen will assist in providing certainty over deliverability and housing supply within the plan period together with alternative range and choice.

5.0 Conclusion

5.1 In the first instance, we welcome the significant progress taken by Newport Council in recognising that there is a need to establish a significant housing requirement and the benefits that this can bring. However, we believe that the supply in inherently problematic and is not capable of delivering the level of housing required.
5.2 The housing land supply is inadequate to meet the identified 10,350 dwellings. We have a number of significant concerns:
1. There is already a cumulative under provision of housing amounting to over 1,100 houses in the first 18 months of the LDP period and including the shortfall from the UDP;
2. The sites identified as being available during the plan period will not deliver the necessary completions. Many have been around for some considerable time and are subject to constraints that there is no indication can be overcome;
3. The estimation of delivery at Llanwern is significantly overstated when based on historic delays, constraints and progress to date;
4. An element of supply is subject to S106 agreements being signed. Given the already significant delays such sites cannot be robustly considered to be deliverable.
5. There is no flexibility allowance for non-implementation which is likely to be a significant problem.

5.3 It is considered that additional readily available housing sites will be required for development. As such, land at Glochwen should be allocated for development.

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Support for the growth strategy noted.

Justification of Requirement

Following representations at the Deposit LDP stage the housing requirement figure has been justified and increased from the proposed Welsh Government Population projections. There is scope for an authority to deviate from the WG population projections but this deviation is required to be well evidenced. The NLP assessment sets out this evidence base and illustrates that Newport, as one of the few areas in Wales with an anticipated population increase noted in the Census, is set to grow and reflects the Council’s policy aspiration for growth. It should be recognised that the majority of the sites (46 of 55) have planning permission or permission subject to a Section 106 agreement. This established supply with clear market intent illustrates not only that a growth strategy is appropriate but achievable.

As noted above, the Plan identifies its housing requirement for the plan period based on an assessment of need and this is also true of its employment land requirements. The clear strategy for the Plan is for growth and it will be through the successful implementation of the policies of the Plan that this will be achieved. There is a clear link between housing supply and economic growth which is why the supply will be monitored annually.

Reliance on previous Development Plan sites

The Local Development Plan does have a number of housing sites which were identified within the Unitary Development Plan. In total there are 15 of the 55 housing sites which continue into the new plan. The majority of these sites have progressed significantly from the UDP, as noted below:

1. Land adj. McReadys. As of 1st April 2013 the developer is on site preparing the site for development.
2. Eastern Expansion Area. Planning permission has been granted with a signed Section 106 agreement. Gallaghers Estates have confirmed through the JHLAS process that they will be delivering units on site in 2015.
3. Glebelands. This site has an extant planning permission associated with the school site adjacent to the residential area. The land has recently been sold to a developer.
4. Monmouthshire Bank Sidings. Redrow are on site and progressing.
5. Traston Lane. The site has planning permission and the agent has confirmed that they anticipate development on the site in 2015.
6. Pirelli. This site has been sold to the Seren Group (RSL) who launched the development in September 2013.
7. Ty Du Works. An application is being considered by the Council for a new scheme on the site.
8. Farmwood Close. This is an historic site with a LDC for the implementation of 10 units which have not been completed. The land is currently being marketed.
9. City Vision. The developer is on site and progressing.
10. Trinity View. The developer is on site and progressing.
11. Glan Llyn. The developer is on site and progressing. A third developer (St Modwen) are anticipating to being work on Phase 2 in 2015.
12. Mill Street. The site is owned by NCC who will market the site.
13. Herbert Road. This site is adjacent to the Glebeland site noted above. The site is compliant with the overall strategy of the LDP being a brownfield urban site in need of regeneration. There is no application on the site but the area landlord notes their intention to sell the site for development.
14. Whiteheads Works. This site is part of a Welsh Government regeneration scheme, which anticipates delivery to begin in 2016.
15. Bideford Road. This site is compliant with the overall strategy of the LDP being a brownfield urban site with potential for regeneration. There is no application on the site but the area is the remaining part of a housing estate development.

The information above clearly shows that although there are a number of sites which have continued from one development plan to the other they have in the main progressed significantly or that they will be delivered within the plan period. It is also important to note that it was made clear through the UDP process that the growth proposed in the east of the city (i.e. Glan Llyn and Llanwern Village) was not anticipated to be delivered wholly within the UDP plan period.

Delivery in the east

Nonetheless the development rate anticipated over the plan period for the large housing development at Glan Llyn, is based on an annual review through the Joint Housing Land Availability Study (JHLAS) as required by National Planning Policy. The rates are considered appropriate and have been jointly agreed with the JHLAS study group which includes the development industry.

The Plan sets out the anticipated rate of delivery in Chapter 13 which illustrates that the total number of units is set to be delivered across the plan period. This in turn is established yearly through the Joint Housing Land Availability Study and monitored annually within the AMR. The effects of the economic recessions are still being felt within the housing market so it is therefore of no surprise that...
the plan anticipates a lower growth in the first period of the plan compared to the final ten years.

Deliverability and Supply
The Plan does however provide enough land to ensure that a 5 year supply is met and, although the annual build rate is higher than currently achieved, even when taking into account the residual method of calculation the Council has provided an adequate supply of land which has been agreed with the industry through the JHLAS process. In terms of Residual need it should be noted that the assessment of residential need takes into account the period 2011-2026. This takes into account the need of that period which would include the backlog from pre 2011 the proposed figures would result in double counting. It should also be noted that the residual method of calculation for the housing land supply will only be required to take into account those units not completed from 2011 onwards e.g. any provision under the required 690 units pa. It is also useful to note that sites subject to the signing of a section 106 will not be considered within the calculation of the 5 year land supply as noted in TAN1. It is useful to note that such sites have been deemed appropriate for development by the Council having been permitted planning permission subject to a legal agreement, therefore they have been identified within the plan as sites which are compliant with the plans strategy and are considered to be deliverable within the plan period.

As illustrated above the perception that the Plan is overly reliant on sites inherited from the UDP period is not well founded. In addition a number of the sites outlined by the developer as being undeliverable are in fact progressing e.g. Alcan. Not all the sites noted are counted as part of the housing supply due to the lack of evidence of deliverability e.g. Newport Athletic Club. The Council has been realistic in its approach to the housing supply set out in the Plan which is based on the annual JHLAS process to ensure that the sites can be delivered to ensure the strategy is met.

The rate of windfall sites is also questioned and as noted in Planning Policy Wales there is a need to consider the supply from such sites. The LDP based its figures on a review of the past trend of windfall supply which has been drastically cut to reflect the need for the Plan to remain flexible whilst concentrating growth on allocated housing sites and tight settlement boundaries. The plan will be monitored as to the percentage of houses developed on allocated housing sites to ensure that the housing policies of the plan are being effectively implemented.

Range and Choice
The supply of housing is considered to provide for a clear range and choice of housing which is a clear concern for many representors. The housing sites within the Plan are located across the City, with a clear focus on regeneration in the east as per the established strategy. The Plan provides a supply of affordable units for a mixture of needs as well as providing a mix of family homes and inner city living to cater for the broad housing market. The opportunity to provide homes in more rural locations has been investigated and there was no clear evidence to justify expansion to existing settlements. The Plan therefore has provided the opportunity for exception sites where such justification can be produced.

Flexibility
As the representation notes there is no set flexibility figure required for housing supply within development plans. However, during the examination of the Brecon Beacons National Park LDP WG noted a notional figure of 10% but that needed to reflect local circumstances. Other authorities within South East Wales have a range of 12-20% flexibility. It is good practice to allow for unknowns and the need for flexibility within a development plan is inherent from National Planning Policy. In Newport's case the majority of the housing supply has planning permission or is being progressed. Those remaining 9 sites without planning permission are in line with the overall strategy or regeneration needs of the plan. Together they provide a 12% oversupply which is considered appropriate to enable to plan to cope with uncertainties that may arise over the plan period.

Strategy compliance and delivery.
It is considered that the plan provides a more than adequate supply of housing, both market and affordable, which is both deliverable and viable. Many of the sites have progressed since the Revised Deposit Plan was written and there is a steady supply of housing being achieved across Newport. The Plan identifies its housing and employment land supply for the plan period based on an assessment of need. The clear strategy for the Plan is for growth and it will be through the successful implementation of the policies of the Plan that this will be achieved. There is a clear link between housing supply and economic growth which is why the supply will be monitored annually.
Representative Details

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<td>- Cardiff</td>
<td>26/07/2013</td>
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Document: Revised LDP, p.52

Policy: CE04

Summary: Delete the Environmental Space designation on Land at Tredegar Street, Rhiwderin.

### Item Question Representation Text

1. Newbridge Estates Ltd objects to the designation of land at Tredegar Street, Rhiwderin as an Environmental Space and Corridor.

2. The designation of this land results in the Deposit Local Development Plan being unsound in terms of the following tests:

   - C2 in that the designation is not sufficiently robust or flexible;
   - CE2 in that this approach is not realistic or appropriate and is not founded on a robust and credible evidence base; and
   - CE4 in that the restrictive designation does not provide a reasonable level of flexibility to allow the plan to deal with future circumstances.

3. Amplification

   2.1 The above mentioned policy, CE4, outlines that sites which have importance because of their visual qualities or being wildlife habitats or being used for recreational or amenity purposes are identified as Environmental Spaces.

   2.2 It is considered that the site at Tredegar Street, Rhiwderin is not covered by the above.

   2.3 Firstly, the basis of the designation of the site is not clear and it does not appear to have been informed by any professional landscape advice or assessment. In Landscape Assessments undertaken on behalf of Newbridge Estates Ltd in the wider context by Soltys Brewster, it is confirmed that the landscape classification of the site is urban, as expected given that it is within the settlement boundary. Consequently the site has little or no visual quality of merit to warrant a designation as an Environmental Space.

   2.4 With regard to a wildlife habitat as a justification for the designation, the site is not covered by a formal nature conservation designation and does not warrant one.

   2.5 Finally, in relation to open space and recreation it is important to note that the site is in private ownership. The site was at one time rented by Graig Community Council for a play area but the Licence was terminated in February 2009 and the owner does not intend granting a new one. The site is in private ownership and access can be restricted in any event.

4. Required Change

   4.1 That the land at Tredegar Street, Rhiwderin be removed from the Environmental Spaces Corridor designation.

### Item Question

**Representation**

1. New Policy

2. A new paragraph or new text

3. Speaking at Public Examination

4. Soundness of LDP

Due to the significant issues raised in the representations.

**Tick-box reply**

- Yes
- No
### Representation Details

**Newport City Council Local Development Plan**

**by:** (No grouping)

**Filtered to show:** (all of) Stage=L; Status=M

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**Item Question**  | **Council Responses** |

13  | Council Response |

The site is currently a playground and the site has been allocated on that basis.
### Representation Details

**by:** (No grouping)

**Filtered to show:** (all of) Stage=L; Status=M

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<td>Burges Soloman</td>
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**Document:** Revised LDP, p.65

**Policy:** H01

**Summary:** Land at Rock Farm should be allocated for housing.

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**Item Question** | **Representation Text**
--- | ---
5 5 | Add a new site
8 8 | Candidate Site Name
  | Land at Rock Farm.
9 9 | Candidate Site Reference
  | 2074.C1
10 10 | Soundness Test
  | CE2 & CE4

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Additional material submitted - Please click here
1 INTRODUCTION
1.1 This submission has been prepared on behalf of Mr Rowland Crellin. It relates to land contained within Candidate Site 2074.C1 for inclusion in Newport Local Development Plan (2011 - 2026) (the "Plan").
1.2 This document accompanies the required Revised Deposit Representation Form. It details Mr Crellin’s objections to the Revised Deposit Plan, on the basis that it does not meet the following tests of soundness:
   1) CE2: The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on robust and credible evidence; and
   2) CE4: It is reasonably flexible to enable it to deal with changing circumstances.
1.3 This submission provides a description of the site at Section 2; makes representation on the LDP Strategy and Strategic Policies at Section 3; provides a Sustainability Appraisal at Section 4; and provides concluding remarks at Section 5.

2 DESCRIPTION OF THE SITE
2.1 The roughly semi-lunar shaped site is 8.5 hectares and comprises four field blocks. Although the site is considered green field, the site used to be part of the quarry and prior to that was a World War 11 prison camp. It is approximately 10 miles east of Newport (20 minute car journey and 30 minute bus journey), approximately half a mile from Penhow village and 1.5 miles from the village of Llanvaches (2-4 minutes by car and within cycling and walking distance). Its grid reference is ST 428 915.
2.2 Adjacent to the site is the Rock and Fountain Public House, several warehouse units employing roughly 35 individuals and the disused Penhow (stone) Quarry. The quarry is almost twice the size of the site and, situated to the west of the site, neatly encloses the site between the quarry, Pike Road and the A48.
2.3 The south end of the site is within 100 metres of the A48. Pike Road runs along the eastern edge of the site and connects the A48 to Llanvaches. There is also an Indian takeaway restaurant adjacent to the public house. Parc Seymour shop is 1.5 miles from the site.
2.4 The main access to the area is via the A48. Roughly 3 miles south of the site, along St Bride’s Road, Junction 23A of the M4 can be easily accessed.

3 LDP STRATEGY AND STRATEGIC POLICIES
3.1 The Vision and Objectives and the Local Development Plan that Newport are implementing are, in principle, supported. However, this representation seeks to challenge the Local Development Plan’s soundness regarding two specific policies, H1 and SP10.
3.2 Rock Farm’s proposed site is considered to accord with objectives 1-5 and 7-9:
   (a) Sustainable Use of Land;
   (b) Economic Growth;
   (c) Housing;
   (d) Conservation and the Environment;
   (e) Community facilities and Infrastructure;
   (f) Culture and Accessibility; and
   (g) Health and Wellbeing.

3.3 This proposed site would offer a positive contribution to local communities outside Newport town centre. It will offer an alternative to inner-city living, ensuring an adequate supply and variety of housing, enabling a more diverse population to settle within Newport as a region. The proposed site is large enough to incorporate communal areas and some community facilities that will make this area an attractive and sought after place to live that is easily accessible via existing transport links, and within an easy commute of Newport, Monmouth, Chepstow and Caldicot. This will discourage households from migrating from Newport to Monmouth in search of a more rural environment to live in. This proposed site provides the ideal location to encourage healthy and safe lifestyle choices and promote well-being. Several neighbouring villages with shops and existing community facilities are within walking or cycling distance. The existing local pub and takeaway would also benefit and provide a community atmosphere to the inhabitants of the proposed site.
3.4 Policy H1 - Housing Supply:
   (a) There has been insufficient assessment of the housing needs across all parts of the Newport plan area, which has resulted in proposed new site allocations being clustered in and around Newport City without consideration of whether need and demand exists in the rural areas of the county Borough;
   (b) the figures used in the Newport City Council Joint Housing land Availability Study April 2012, which has formed the evidence base for housing provision in the Plan, are flawed, it does not meet the 5 year land bank or sufficient allocations to cover the plan period. Additional sites need to be allocated; and
   (c) It has failed to allocate Candidate Site 2074.C1
3.6 'Networked' city

3.7 The Wales Spatial Plan Update 2008 states that South East Wales needs to function as a 'networked' city. The borough of Newport is 70 per cent rural and as such, some networks need to be developed into the more rural communities from the City of Newport itself; this should comprise transport and housing elements. The present allocation of sites in the Plan comprises 105 hectares of almost exclusively Brownfield, central sites which will result in housing being squeezed into the centre of Newport and the City becoming more compact.

3.8 The regional transport plan being developed by the South East Wales Transport Alliance will further help the 'networked' city concept and ensure that the proposed site only becomes better connected with other areas of South East Wales in time. This will promote sustainability and add to its viability as a real substantial alternative to city and urban living.

3.9 Housing Supply

3.10 Planning Policy Wales (5th edition) ("PPW") at chapter 9.2 - Development Plans and New Housing Provision - Paragraph 9.2.3 states: "local planning authorities must ensure that sufficient land is genuinely available or will become available to provide a 5 year supply of land for housing; this means that sites must be free, or readily freed, from planning, physical and ownership constraints, and economically feasible for development..... For land to be regarded as genuinely available it must be a site included in a Joint Housing Land Availability Study."

3.11 TAN 1 (2006) states: "JHLA studies provide an important part of the evidence base for plan preparation. They provide information on previous house building rates and the current supply of land for housing as inputs to the Local Development Plan (LOP) strategy and policy development process." (Paragraph 4.1) "Where the current study shows a land supply below the 5 year requirement, the need to increase supply should be given considerable weight..... This may include reviewing the development plans". (Paragraph 5.1)

3.12 For the reasons set out below the Joint Housing Land Availability Study (JHLA) and the housing supply figures in the Plan policy H 1 do not support a 5-year supply of land for housing or sufficient provision to meet the requirement in the Plan policy SP1 0 to supply 10,350 units over the Plan period.

JHLA - Figures

3.13 The 2011 JHLA used the 'residual method' for calculating land supply. It noted that during the Plan period the Plan had under delivered housing and to make up the shortfall needed to provide 930 houses per year. This measured against the approved available land of 3221 units meant an available land bank of 3.5 years. However, it further notes that when set against 'past completions' it creates a land bank of 6.8 years 3.14 In JHLA 2012 the 'past completions' method was used. Based on the approved available land of 3257 units measured against the historical completion rate of 461.

JHLA 2012 states there is a land supply of 7.5 years.

3.15 Given the 2011 JHLA acknowledged that the plan had under delivered on housing supply during the plan period and that TN1 states the land supply in the JHLA should "inform the strategy in the development plan" the past completions method is a flawed assessment of land availability.

3.16 Considering that T AN1 states that the JHLA is supposed to guiding the plan process it is surprising that unlike the 2011 JHLA the 2012 JHLA gives no consideration to the required housing delivery in the Plan measured against the 5 year landbank.

3.17 When the housing supply is measured against the Plan, which identifies in SP10 that 690 units are required to be delivered a year, the plan does not have a five year land bank but 4.5 years.

3.18 There is clearly an inconsistency between the plan provision and the 5-year supply set out in the JHLA. It is questionable whether a 5 year supply truly exists for the Newport area. It is certainly not clear that the longer term housing supply over a 15 year period has been assessed to justify the projected figures up to 2026.

3.19 Additional sites need to be allocated to provide a 5-year housing supply and make the plan sound.

8106 and land supply

3.20 T AN1 states that "sites subject to s106 agreements should only be included in the studies if they are located in an adopted local plan."

3.21 The Plan includes 424 units listed in applications without s106 agreements. The JHLA used the 'past completions' method to assess land availability because the plan is considered out of date. By the same measure it is considered that allocations subject to s106 agreements that are included in out of date plans should not be included in the
Additional comments on the provision of housing land and the financial viability of sites.

3.22 Additionally, many of these sites have been on the HLA for 3 or 4 years. It is suggested that in accordance with PPW 9.2.3 and TAN1 2.2 that these sites are not genuinely available and should not be included in the 5-year land supply.

Financial viability and land supply
3.23 Many of the sites identified in the housing provision have been on the HLA for many years and were granted consent prior to the economic downturn. Although the JHLA 'statement of common ground' suggests some of these will be brought forward by the agent, agents are unlikely to say that they do not intend to bring sites forward.

3.24 In accordance with TAN 1 paragraph 7.3.3 the JHLA group should agree that the sites are financially viable. There is no evidence that the group agreed the financial viability of any of the sites. Many of the sites were consented pre 2009 and are unlikely to be financially viable.

5 year supply
3.25 Many of the sites have been on the HLA for well in excess of 5 years. TAN 1 paragraph 7.4.1 states:

"some sites have remained in category 2 for periods well in excess of 5 years. This may in some areas distort the agreed housing land availability figure. Where sites in category 2 remain undeveloped for more than 5 years there should be a presumption to reclassify such sites into category 3i"

3.26 The JHLA 2012 at table 1 allocates 2511 units as category 2 development but does not provide a breakdown of how the sites have been allocated between category 1 and category 2.

3.27 On the presumption that the sites allocated over 5 years ago and not proposed to be developed within 1 year should be category 3i allocation, 2,193 units currently listed as category 2 land, which have been included in the approved available land figure, should be category 3i and should not be considered as available land.

3.28 If the 2193 units presumed to be category 3i allocations are deducted from the identified housing land supply it would leave a housing land supply of 926. On the past completions method this provides for 1.9 years of housing supply or, against the LDP policy SP10 requirement of providing 690 units a year, it provides 1.3 years of housing land supply.

3.29 As stated above PPW places a requirement for LPAs to provide sufficient housing to comply with Household Projections for Wales (9.2.2) and a land bank of 5-years (9.2.3).

Housing supply for the plan period
3.30 The figures in the JHLA are supposed to form the evidence base and influence the plan making process (TAN1 paragraph 4.1) but are not included in policy H1. The figures in policy H1 identify 3407 units as the total capacity of the site or 2793 units to be delivered within the plan period. These figures do not match the JHLA 2012 which states 3257 units are available. H1 further identifies an additional 424 that are subject to s106 agreements, which, as mentioned above, should not be included in the housing supply figures.

3.31 If a deduction is made for the 424 units that are identified in policy H1 as requiring s106 agreements and the 2193 units (noted above as not genuinely available within the meaning of PPW or TAN1) then a deduction of 2,617 needs to be deducted from the total provision of 11,622 at paragraph 5.3 of the Plan leaving a housing supply of 9,005 units. This is below the required 10,350 units identified in policy SP10.

3.32 The plan is unsound as it does not make provision for enough housing to cover the plan period or satisfy the 5 year landbank requirement in both PPW and TAN1. Additional sites need to be allocated and the applicant’s site would assist in addressing this shortfall.

3.33 Presumption in favour of sustainable development

3.34 Paragraph 4.2.2 of PPW provides for its presumption in favour of sustainable development to ensure that social, economic and environmental issues are balanced and integrated, at the same time, by the decision-taker, when: Preparing a development plan.....“

3.35 The objectives of sustainable development to be taken into account in the preparation of local plans are set out in paragraph 4.4.3 of PPW. The proposed site would comply with many of the principles which the Plan has not considered in the assessment of the site, specifically:
Sustainable build standards
3.36 It is proposed that the development would, as far as practicable, maximise the use of renewable resources.
3.37 To further enhance the sustainable nature of the site the new dwellings will be constructed in accordance with ‘The Code for Sustainable Homes’ with the aim of achieving a minimum of a level rating in line with Council policy. Green energy production and waste disposal facilities could be considered to promote financially viable green alternatives such as biomass generators or solar tiles for inclusion in the development.

Sustainable transport links
3.38 An existing bus service provides an hourly link both to Chepstow and Newport from outside the Rock and Fountain public house which adjoins the site. The development is of a scale that the bus network could be improved to ensure sustainable modes of transport are available and the site is accessible by means other than private car.
3.39 The site is within walking and cycling distance of Penhow village (half a mile) and Llanvaches (1.5 mile) and has good transport link to the wider area as it is located on the A48 and within easy access of the M4.
3.40 Steeped in the heart of Welsh Policy is the ambition to build a rich cultural and healthy environment for residents and tourists alike to enjoy. The Wales Spatial Plan recognises the important role that Key Settlements will play in ensuring that sustainable communities promote Newport as a whole rather than as a City alone. Chepstow is one of the Key Settlements that has been identified; this is 20 minutes by car and 30 minutes by bus from the proposed site. It offers a plethora of learning and employment opportunities to its inhabitants. These resources could be tapped into by inhabitants of the proposed site. The South East Wales Transport Alliance should no doubt improve this already easy access to this integral town in South Wales.
3.41 The ultimate developers of the proposed site at Rock Farm would consider closely the Countryside Council for Wales’ objectives and ensure that any development on the site was sympathetic to the surroundings. Its location is ideal for marrying a healthy life in the countryside with a prosperous and fulfilled educational and employment career; all key contributors to a healthy and sustainable population.

Lack of rural housing supply
3.42 Paragraph 9.1.4 of PPW states that Development Plan policies should be based on an up-to-date assessment of the full range of housing requirements across the entire plan area and over the plan period. This is reflected in TAN 2 at paragraph 8.1. The Plan entirely fails to achieve this as it does not assess pockets of need or demand in smaller areas and instead focuses all allocations within the periphery of the City.
3.43 The proposed site represents an opportunity to secure an element of rural affordable housing. There is a genuine local need visible by the fact that households are migrating out of Newport and into Monmouthshire. The proposed site would help stop this from happening by meeting this need.
3.44 TAN 2 (2006) states that planning authorities should approach affordable housing need in an innovative way to maximise its supply. Newport is primarily made up of rural landscape, it would therefore seem logical to make some provision for market and affordable housing in the rural areas. This will discourage polarisation of the rural communities and cities.
3.45 At present there is no support for the rural economy due to a failure to assess local rural needs outside Newport City boundary. There has been an evident presumption, based on sustainability issues, that all housing need and demand should be focused into the City. However, from the sustainability assessment of the proposed site, (see Section 4 for details) it can be seen that in sustainability terms the site is comparable to other Brownfield sites that have been allocated within the Plan.
3.46 One significant reason that the proposed site failed to achieve a more accurate assessment of its sustainability is likely to be because it has been categorised into a group with another site. The other site location (South View, Llanvaches) has different immediate surroundings and proximity to amenities and is being proposed as an open space site; the result being that the proposed site at Rock Farm achieves an artificially low score compared to when the site is considered in isolation. This has been addressed through the Sustainability Appraisal in section 4.
3.47 Paragraph 10.12 of T AN2 states that there must be adequate housing provision in rural areas to meet the needs of local people and contribute to the delivery of sustainable communities, however, the Plan does not identify rural housing need or clearly set out how it will contribute to meeting any identification of such. Furthermore paragraph 10.15 states that assessments need to be undertaken at ward or village level. There is a lack of evidence to support the fact that this has happened despite Welsh national policy stipulating that a full range of housing requirements across the whole plan area over the plan period should be assessed.

3.48 In recognition of its rural location the design of any development would recognise distinctive elements of living outside a settlement boundary. The preservation of existing boundary hedgerows with the additional planting of native species, and provision of open spaces within the development would enable some aspects of the original site to be retained. The location of the site adjacent to the quarry and the A48 would minimise landscape impacts and visual intrusion from the development of this site. It has the potential to support local businesses and create opportunities for diversification within the local economy by providing a much needed opportunity to ensure that workers are locally available, improve local facilities, particularly leisure and other activities as part of the overall development offering.

3.49 This site is not located within one of the identified Green Wedges or Green Belts so would have no adverse impact on SP6 and SP7 - Green Belt and Green Wedges. Policy SP1 0 - House Building Requirement:

3.50 This policy is considered unsound on the basis that provision for housing development outside settlement boundaries should be possible where conditions are imposed. The Welsh Spatial Plan (WSP) states that the projected population and household growth in Newport is significant (WSP paragraph 19.15) and that Newport is the economic gateway to Wales (WSP paragraph 19.11).

3.51 As previously noted, there has been insufficient assessment of the local housing needs in more rural areas of Newport. It is therefore questionable whether the Plan allocates housing in the right locations. The current allocations proposed allocations seem to be focused within the Newport City region and not further afield resulting in areas such as Penhow being given no opportunity for future housing provisions.

3.52 The proposed Rock Farm site would also be capable of bridging the divide between the proposed Newport development sites and Monmouth, Chepstow and Caldicot development sites.

3.53 Completions within the Newport region during the years 2010, 2011 and 2012 are currently 67% of the number that they were in the years 2007, 2008 and 2009. Because of the global economic recession many of the developments accepted into the UDP have stalled, there is still a decreased level of construction compared to several years ago and possibly a reluctance or inability to progress these projects towards completion. It also indicates a failure that existing developments can meet the actual demands and requirements of local people. As mentioned above many of the sites listed in the housing land supply are likely to be unviable and should not be included in the Plan's housing supply figures.

3.54 The proposed site is a sustainable alternative to large inner city redevelopment of Brownfield sites in the way of a smaller, local development, providing a unique housing opportunity which would be a welcome stimulant to the housing market.

3.55 Figure 24 of the LHMA states that there is currently a net affordable housing need for 1, 2 and 4 bedroom dwellings in the rural hinterland in Newport. This cannot be met exclusively by single strategic sites in Newport's more urban areas and should be met by diverse housing availability particularly in relation to larger 4 bedroom family homes.

The proposed Rock Farm site is within the rural hinterland, immediately available for delivery and does not have the complications that are likely to arise from the use of other previously developed sites, for example the land would not need extensive decontamination, as may be the case for the Steel works site to the East of Newport centre, so a development timescale can be more confidently assessed.

3.56 In the eight years from 1999 the average property price rose by 165% in Newport. Paragraph 5.1 of the LHMA identifies that the affordable housing need equates to 593 units a year or 86% of the proposed 690 units in the Plan. Although the Plan states that it cannot meet this target the proposed site is large enough to have a significant number of affordable housing dwellings (at least 30% of the total housing built) that would help combat the current need for more affordable housing within the region.

3.57 In order to make Policy H1 sound Candidate Site 2074.C1 should be included within it.

3.58 Policy SP2 - Health:
3.59 This Policy would be adhered to and indeed be encouraged by the proposed site as it would allow households to experience a rural environment on a daily basis. This would be likely to promote health and well-being as it would encourage inhabitants to explore their local surroundings on foot and embrace countryside living. There has been some limited work on the connection between overcrowding and mental health reported in the Journal of Environmental Health Research (Volume 1; Issue 1: Poor Housing and Mental Health in the United Kingdom: Changing the Focus for Intervention, dated 2002), which suggest a correlation between depression psychological symptoms with overcrowding within a community. (Appendix 1). The ODPM have also undertaken research and published their findings. This document, The Impact of Overcrowding on Health and Education: A review of the Evidence and Literature also notes limited evidenced links between overcrowding and poor physical and mental health in children and adults (Housing Research Summary Publication. Issue 210,2004). (Appendix 2).

3.60 Paragraph 3.3.2 of the LHMA states that one of the most common reasons people wanted to move was due to overcrowding with 10% of all applications to move on the common housing register being for this reason. Using Brownfield sites almost exclusively in the Plan will only serve to increase the density of the population, and the potential for overcrowding, within Newport.

3.61 H3 - Housing Mix and Density: The proposed site would add real value and measurable results to this Policy. The proposed site is large enough to accommodate some community facilities in addition to various dwelling sizes and types. This proposed site provides a valuable alternative to inner-city living. Surrounding the proposed site there is already a public house, several warehouse and an Indian take-away restaurant and a disused quarry. The development of the proposed site would provide housing for individuals working at any of these establishments as well as in the land area. Its size and location means that it can accommodate a range of areas in addition to housing, such as retail, leisure and, probably, live work units.

3.62 As noted above, at paragraph 3.58, there is some evidence to suggest that overcrowding contributes or worsens mental health problems. By creating new sustainable pockets of housing rather than infilling on brownfield sites, this small but significant correlation between overcrowding and mental health may be minimised.

4 SUSTAINABILITY APPRAISAL

4.1 As previously noted at paragraph 3.46 the Council's sustainability appraisal considered the proposed site at Rock Farm in conjunction with another other site that is arguably less sustainable that the Rock Farm site. This resulted in the Rock Farm site sustainability figures being artificially suppressed. Taken in isolation the following assessment is believed to be a more accurate reflection of the site.

4.2 The Council's assessment has been revised to focus on the merits of the Candidate Site 2074.C1 at Rock Farm. The table below shows the Council's assessment and our assessment, where there is agreement, this is acknowledged, where there is a difference of opinion reasons are provided.

4.3 Previously the proposed site scored: It now scores:
(a) Red: 6 4
(b) Orange: 17 13
© Green: 11 19
(d) Black and White: 4 4
€ Questionable: 4 2

4.4 As a result of this assessment the proposed site scores considerably more favourably and is comparable with some sites which have emerged as housing land allocation.

4.5 The proposed site would also be compatible with wider regional and national policy as it would facilitate individuals to lead healthier lifestyles in rural areas, without impinging on Green Belt land or significantly changing the landscape of the surrounding area.

5 CONCLUSION

5.1 This representation has been prepared on behalf of Mr Rowland Crellin. It relates to land being promoted for development at Rock Farm, Penhow, adjacent to the disused Stone Quarry, several warehouse units and the Rock & Fountain Public House. The 8.5 hectare site is situated just north of the A48 and to the west of Pike Road.

5.2 Mr Crellin's main objection to the Local Development Plan relates to Policies H1 and SP10. There is insufficient land allocation and housing planned across the whole county Borough area and the concentration of development sites being around the centre of Newport and to the east and west of Newport results in the housing allocation not being diverse enough. As a result, it will increasingly be difficult to meet the needs of all households. This may result in a sustained net migration out of Newport.
5.3 Newport has been recognised as the economic gateway to Wales and population and household numbers are expected to rise. Sufficient dwellings across the whole plan area therefore need to be provided. This is not currently provided for in the Local Development Plan, which fails to assess specific areas of local need or provide for a diverse range of housing locations.

5.4 The proposed site at Rock Farm would be an ideal location to allocate housing and to ensure that there is some provision made for affordable/rural housing in this area of Newport and to meet local needs. It has an existing transport system that could be easily modified to accommodate the increased usage and almost half the site is already surrounded by development to some degree, thereby allowing the development to be accommodated without significantly adversely impacting the wider rural surroundings.

5.5 It has been demonstrated that the proposed site is compatible with achieving the Sustainability Appraisal objectives.

5.6 It is respectfully submitted therefore that the failure to allocate Rock Farm Candidate Site 2074.C1 within Policy H1 is unsound and in order to make Policy H1 sound Rock Farm Candidate Site 2074.C1 should be included.

It is necessary to speak at the hearing in relation to the above to enable detailed discussion on housing figures and the merits of the candidate site.

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Speaking at Public Examination

Policy H1, SP10 and the merits of the candidate site.

It is necessary to speak at the hearing in relation to the above to enable detailed discussion on housing figures and the merits of the candidate site.
The Council response to the representation concerning policy SP10 can be viewed against representation 2074.L2.

Justification of Requirement
Following representations at the Deposit LDP stage the housing requirement figure has been justified and increased from the proposed Welsh Government Population projections. There is scope for an authority to deviate from the WG population projections but this deviation is required to be well evidenced. The NLP assessment sets out this evidence base and illustrates that Newport, as one of the few areas in Wales with an anticipated population increase noted in the Census, is set to grow and reflects the Council’s policy aspiration for growth. It should be recognised that the majority of the sites (46 of 55) have planning permission or permission subject to a Section 106 agreement. This established supply with clear market intent illustrates not only that a growth strategy is appropriate but achievable.

Reliance on previous Development Plan sites
The Local Development Plan does have a number of housing sites which were identified within the Unitary Development Plan. In total there are 15 of the 55 housing sites which continue into the new plan. The majority of these sites have progressed significantly from the UDP, as noted below:

1. Land adj. McReadys. As of 1st April 2013 the developer is on site preparing the site for development.
2. Eastern Expansion Area. Planning permission has been granted with a signed Section 106 agreement. Gallagher Estates have confirmed through the JHLAS process that they will be delivering units on site in 2015.
3. Glebelands. This site has an extant planning permission associated with the school site adjacent to the residential area. The land has recently been sold to a developer.
4. Monmouthshire Bank Sidings. Redrow are on site and progressing.
5. Traston Lane. The site has planning permission and the agent has confirmed that they anticipate development on the site in 2015.
6. Pirelli. This site has been sold to the Seren Group (RSL) who launched the development in September 2013.
7. Ty Du Works. An application is being considered by the Council for a new scheme on the site.
8. Farmwood Close. This is an historic site with a LDC for the implementation of 10 units which have not been completed. The land is currently being marketed.
9. City Vision. The developer is on site and progressing.
10. Trinity View. The developer is on site and progressing.
11. Glan Llyn. The developer is on site and progressing. A third developer (St Modwen) are anticipating to begin work on Phase 2 in 2015.
12. Mill Street. The site is owned by NCC who will market the site.
13. Herbert Road. This site is adjacent to the Glebeland site noted above. The site is compliant with the overall strategy of the LDP being a brownfield urban site in need of regeneration. There is no application on the site but the area land owner notes their intention to sell the site for development.
14. Whitehead Works. This site is part of a Welsh Government regeneration scheme, which anticipates delivery to begin in 2016.
15. Bideford Road. This site is compliant with the overall strategy of the LDP being a brownfield urban site with potential for regeneration. There is no application on the site but the area is the remaining part of a housing estate development.

The information above clearly shows that although there are a number of sites which have continued from one development plan to the other they have in the main progressed significantly or that they will be delivered within the plan period. It is also important to note that it was made clear through the UDP process that the growth proposed in the east of the city (i.e. Glan Llyn and Llanwern Village) was not anticipated to be delivered wholly within the UDP plan period.

Delivery Rates
The Plan sets out the anticipated rate of delivery in Chapter 13 which illustrates that the total number of units is set to be delivered across the plan period. This in turn is established yearly through the Joint Housing Land Availability Study and monitored annually within the AMR. The effects of the economic recessions are still being felt within the housing market so it is therefore of no surprise that the plan anticipates a lower growth in the first period of the plan compared to the final ten years.

Deliverability and Supply
The Plan does however provide enough land to ensure that a 5 year supply is met and, that although the annual build rate is higher than currently achieved, even when taking into account the residual method of calculation the Council has provided an adequate supply of land which has been agreed with the industry through the JHLAS process. It should be noted that sites subject to the signing of a section 106 will not be considered within the calculation of the 5 year land supply as noted in TAN1. It is useful to note that such sites have been deemed appropriate for development by the Council.
having been permitted planning permission subject to a legal agreement, therefore they have been identified within the plan as sites which are compliant with the plans strategy and are considered to be deliverable within the plan period.

As illustrated above the perception that the Plan is overly reliant on sites inherited from the UDP period is not well founded. In addition a number of the sites outlined by the developer as being undeliverable are in fact progressing e.g. Alcan. Not all the sites noted are counted as part of the housing supply due to the lack of evidence of deliverability e.g. Newport Athletic Club. The Council has been realistic in its approach to the housing supply set out in the Plan which is based on the annual JHLAS process to ensure that the sites can be delivered to ensure the strategy is met.

Range and Choice

The supply of housing is considered to provide for a clear range and choice of housing which is a clear concern for many representors. The housing sites within the Plan are located across the City, with a clear focus on regeneration in the east as per the established strategy. The Plan provides a supply of affordable units for a mixture of needs as well as providing a mix of family homes and inner city living to cater for the broad housing market. The opportunity to provide homes in more rural locations has been investigated and there was no clear evidence to justify expansion to existing settlements. No evidence has also been provided to support the representation that a site is required to bridge the division between Newport and Monmouth. Assessments of housing need take into account cross boundary issues. The Plan therefore has provided the opportunity for exception sites where such justification can be produced.

Flexibility

As the representation notes there is no set flexibility figure required for housing supply within development plans. However, during the examination of the Brecon Beacons National Park LDP WG noted a notional figure of 10% but that needed to reflect local circumstances. Other authorities within South East Wales have a range of 12-20% flexibility. It is good practice to allow for unknowns and the need for flexibility within a development plan is inherent from National Planning Policy. In Newport’s case the majority of the housing supply has planning permission or is being progressed. Those remaining 9 sites without planning permission are in line with the overall strategy or regeneration needs of the plan. Together they provide a 12% oversupply which is considered appropriate to enable plan to cope with uncertainties that may arise over the plan period.

Health and Well being

The Plan recognises the impact development can have on health and well-being and provides a policy framework that ensures development takes into account those aspects which planning can impact upon e.g. provision of open space, amenity, density, pollution etc. The representation specifically mentions the concern of overcrowding as a reason for increased housing provision. The LHMA notes overcrowding as a reason for more housing but this is overcrowding within a particular property not the overcrowding of housing within an area, which this representation seems to imply. The density levels required are set based on the specific factors of the site but the Plan is clear that there is a need for family housing in Newport which will require a mix of densities depending on the sites needs and location.

Affordable Housing Provision

It is recognised that the required level of affordable housing for Newport cannot be met by the Plan alone. The level of supply which can be achieved through the implementation of the affordable housing policy in addition to those units already secured through the planning process has been clearly set out. It is not the sole responsibility of the planning system to meet the affordable housing requirement however the Plan does set a policy framework in order to achieve the highest level of affordable housing provision possible in both urban and rural areas.

Strategy compliance and delivery.

It is considered that the plan provides a more than adequate supply of housing, both market and affordable, which is both deliverable and viable.

The site at Rock Farm is located in a divorced location from the Llanvaches village boundary in an unsustainable location. The site is also within a Mineral Safeguarding Area and Special Landscape Area.

The plan seeks to promote the reuse of Brownfield sites in preference to extensive use of Greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities.

The forecast housing need has been assessed in the context of population and employment projections and current market realities. The Plan allocates more than sufficient land to meet this requirement. Additional housing allocations in a rural location cannot therefore be justified. Furthermore, the release of the representation site for housing would be contrary to the Council’s strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

It is recommended that this site is not included in the Local Development Plan for development.
### Representation Details

**Document:** Revised LDP, p.24  
**Policy:** SP10  
**Summary:** There is insufficient housing supply therefore land at Rock Farm should be allocated for housing.

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**Additional material submitted**

**Accession No:** 2074.L2/SP10  
**Agent:** Burges Solomon  
**Date Lodged:** 25/07/2013  
**Status:** E O I M 
**Source:** Additional material submitted

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**Status Modified:** 12/02/2014 Page 531 of 1581
INTRODUCTION
1.1 This submission has been prepared on behalf of Mr Rowland Crellin. It relates to land contained within Candidate Site 2074.C1 for inclusion in Newport Local Development Plan (2011 - 2026) (the "Plan").

1.2 This document accompanies the required Revised Deposit Representation Form. It details Mr Crellin’s objections to the Revised Deposit Plan, on the basis that it does not meet the following tests of soundness:
1) CE2: The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on robust and credible evidence; and
2) CE4: It is reasonably flexible to enable it to deal with changing circumstances.

1.3 This submission provides a description of the site at Section 2; makes representation on the LDP Strategy and Strategic Policies at Section 3; provides a Sustainability Appraisal at Section 4; and provides concluding remarks at Section 5.

DESCRIPTION OF THE SITE
2.1 The roughly semi-lunar shaped site is 8.5 hectares and comprises four field blocks. Although the site is considered green field, the site used to be part of the quarry and prior to that was a World War Two prison camp. It is approximately 10 miles east of Newport (20 minute car journey and 30 minute bus journey), approximately half a mile from Penhow village and 1.5 miles from the village of Llanvaches (2-4 minutes by car and within cycling and walking distance). Its grid reference is ST 428 915.

2.2 Adjacent to the site is the Rock and Fountain Public House, several warehouse units employing roughly 35 individuals and the disused Penhow (stone) Quarry. The quarry is almost twice the size of the site and, situated to the west of the site, neatly encloses the site between the quarry, Pike Road and the A48.

2.3 The south end of the site is within 100 metres of the A48. Pike Road runs along the eastern edge of the site and connects the A48 to Llanvaches. There is also an Indian takeaway restaurant adjacent to the public house. Parc Seymour shop is 1.5 miles from the site.

2.4 The main access to the area is via the A48. Roughly 3 miles south of the site, along St Bride’s Road, Junction 23A of the M4 can be easily accessed.

LDP STRATEGY AND STRATEGIC POLICIES
3.1 The Vision and Objectives and the Local Development Plan that Newport are implementing are, in principle, supported. However, this representation seeks to challenge the Local Development Plan’s soundness regarding two specific policies, H1 and SP10.

3.2 Rock Farm’s proposed site is considered to accord with objectives 1-5 and 7-9:
(a) Sustainable Use of Land;
(b) Economic Growth;
© Housing;
(d) Conservation and the Environment;
€ Community facilities and Infrastructure;
(f) Culture and Accessibility; and
(g) Health and Wellbeing.

3.3 This proposed site would offer a positive contribution to local communities outside Newport town centre. It will offer an alternative to inner-city living, ensuring an adequate supply and variety of housing, enabling a more diverse population to settle within Newport as a region. The proposed site is large enough to incorporate communal areas and some community facilities that will make this area an attractive and sought after place to live that is easily accessible via existing transport links, and within an easy commute of Newport, Monmouth, Chepstow and Caldicot. This will discourage households from migrating from Newport to Monmouth in search of a more rural environment to live in. This proposed site provides the ideal location to encourage healthy and safe lifestyle choices and promote well-being. Several neighbouring villages with shops and existing community facilities are within walking or cycling distance. The existing local pub and takeaway would also benefit and provide a community atmosphere to the inhabitants of the proposed site.

3.4 Policy H1 - Housing Supply:
(a) There has been insufficient assessment of the housing needs across all parts of the Newport plan area, which has resulted in proposed new site allocations being clustered in and around Newport City without consideration of whether need and demand exists in the rural areas of the county Borough;
(b) the figures used in the Newport City Council Joint Housing land Availability Study April 2012, which has formed the evidence base for housing provision in the Plan, are flawed, it does not meet the 5 year land bank or sufficient allocations to cover the plan period. Additional sites need to be allocated; and
© It has failed to allocate Candidate Site 2074.C1
3.6 ‘Networked’ city

3.7 The Wales Spatial Plan Update 2008 states that South East Wales needs to function as a ‘networked’ city. The borough of Newport is 70 per cent rural and as such, some networks need to be developed into the more rural communities from the City of Newport itself; this should comprise transport and housing elements. The present allocation of sites in the Plan comprises 105 hectares of almost exclusively Brownfield, central sites which will result in housing being squeezed into the centre of Newport and the City becoming more compact.

3.8 The regional transport plan being developed by the South East Wales Transport Alliance will further help the ‘networked’ city concept and ensure that the proposed site only becomes better connected with other areas of South East Wales in time. This will promote sustainability and add to its viability as a real substantial alternative to city and urban living.

3.9 Housing Supply

3.10 Planning Policy Wales (5th edition) ("PPW") at chapter 9.2 - Development Plans and New Housing Provision - Paragraph 9.2.3 states: “local planning authorities must ensure that sufficient land is genuinely available or will become available to provide a 5 year supply of land for housing.... This means that sites must be free, or readily freed, from planning, physical and ownership constraints, and economically feasible for development..... For land to be regarded as genuinely available it must be a site included in a Joint Housing Land Availability Study.”

3.11 TAN 1 (2006) states: “JHLA studies provide an important part of the evidence base for plan preparation. They provide information on previous house building rates and the current supply of land for housing as inputs to the Local Development Plan (LDP) strategy and policy development process.” (Paragraph 4.1) “Where the current study shows a land supply below the 5 year requirement, the need to increase supply should be given considerable weight..... This may include reviewing the development plan”. (Paragraph 5.1)

3.12 For the reasons set out below the Joint Housing Land Availability Study (JHLA) and the housing supply figures in the Plan policy H 1 do not support a 5 year supply of land for housing or sufficient provision to meet the requirement in the Plan policy SP10 to supply 10,350 units over the Plan period.

JHLA - Figures

3.13 The 2011 JHLA used the 'residual method' for calculating land supply. It noted that during the Plan period the Plan had under delivered housing and to make up the shortfall needed to provide 930 houses per year. This measured against the approved available land of 3221 units meant an available land bank of 3.5 years. However, it further notes that when set against 'past completions' it creates a land bank of 6.8 years.

3.14 In JHLA 2012 the 'past completions' method was used. Based on the approved available land of 3257 units measured against the historical completion rate of 461.

JHLA 2012 states there is a land supply of 7.5 years.

3.15 Given the 2011 JHLA acknowledged that the plan had under delivered on housing supply during the plan period and that TAN1 states the land supply in the JHLA should "inform the strategy in the development plan" the past completions method is a flawed assessment of land availability.

3.16 Considering that TAN1 states that the JHLA is supposed to guiding the plan process It is surprising that unlike the 2011 JHLA the 2012 JHLA gives no consideration to the required housing delivery in the Plan measured against the 5 year landbank.

3.17 When the housing supply is measured against the Plan, which identifies in SP10 that 690 units are required to be delivered a year, the plan does not have a five year land bank but 4.5 years.

3.18 There is clearly an inconsistency between the plan provision and the 5-year supply set out in the JHLA. It is questionable whether a 5 year supply truly exists for the Newport area. It is certainly not clear that the longer term housing supply over a 15 year period has been assessed to justify the projected figures up to 2026.

3.19 Additional sites need to be allocated to provide a 5-year housing supply and make the plan sound.

$106 and land supply

3.20 T AN1 states that "sites subject to s106 agreements should only be included in the studies if they are located in an adopted local plan."
The Plan includes 424 units listed in applications without s106 agreements. The JHLA used the 'past completions' method to assess land availability because the plan is considered out of date. By the same measure it is considered that allocations subject to s106 agreements that are included in out of date plans should not be included in the available land supply assessment.

Additionally, many of these sites have been on the HLA for 3 or 4 years. It is suggested that in accordance with PPW 9.2.3 and TAN1 2.2 that these sites are not genuinely available and should not be included in the 5-year land supply.

Financial viability and land supply

Many of the sites identified in the housing provision have been on the HLA for many years and were granted consent prior to the economic downturn. Although the JHLA 'statement of common ground' suggests some of these will be brought forward by the agent, agents are unlikely to say that they do not intend to bring sites forward.

In accordance with TAN 1 paragraph 7.3.3 the JHLA group should agree that the sites are financially viable. There is no evidence that the group agreed the financial viability of any of the sites. Many of the sites were consented pre 2009 and are unlikely to be financially viable.

5 year supply

Many of the sites have been on the HLA for well in excess of 5 years. TAN 1 paragraph 7.4.1 states: "Some sites have remained in category 2 for periods well in excess of 5 years. This may in some areas distort the agreed housing land availability figure. Where sites in category 2 remain undeveloped for more than 5 years there should be a presumption to reclassify such sites into category 3i."

The JHLA 2012 at table 1 allocates 2511 units as category 2 development but does not provide a breakdown of how the sites have been allocated between category 1 and category 2.

On the presumption that the sites allocated over 5 years ago and not proposed to be developed within 1 year should be category 3i allocation, 2,193 units currently listed as category 2 land, which have been included in the approved available land figure, should be category 3i and should not be considered as available land.

If the 2193 units presumed to be category 3i allocations are deducted from the identified housing land supply it would leave a housing land supply of 926. On the past completions method this provides for 1.9 years of housing supply or, against the LDP policy SP10 requirement of providing 690 units a year, it provides 1.3 years of housing land supply.

As stated above PPW places a requirement for LPAs to provide sufficient housing to comply with Household Projections for Wales (9.2.2) and a land bank of 5-years (9.2.3).

Housing supply for the plan period

The figures in the JHLA are supposed to form the evidence base and influence the plan making process (TAN1 paragraph 4.1) but are not included in policy H1. The figures in policy H1 identify 3407 units as the total capacity of the site or 2793 units to be delivered within the plan period. These figures do not match the JHLA 2012 which states 3257 units are available. H1 further identifies an additional 424 that are subject to s106 agreements, which, as mentioned above, should not be included in the housing supply figures.

If a deduction is made for the 424 units that are identified in policy H1 as requiring s106 agreements and the 2193 units (noted above as not genuinely available within the meaning of PPW or TAN1) then a deduction of 2,617 needs to be deducted from the total provision of 11,622 at paragraph 5.3 of the Plan leaving a housing supply of 9,005 units. This is below the required 10,350 units identified in policy SP10.

The plan is unsound as it does not make provision for enough housing to cover the plan period or satisfy the 5 year landbank requirement in both PPW and TAN1. Additional sites need to be allocated and the applicant's site would assist in addressing this shortfall.

Presumption in favour of sustainable development

Paragraph 4.2.2 of PPW provides for its presumption in favour of sustainable development to ensure that social, economic and environmental issues are balanced and integrated, at the same time, by the decision-taker, when: Preparing a development plan....."
Representation Details

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3.35 The objectives of sustainable development to be taken into account in the preparation of local plans are set out in paragraph 4.4.3 of PPW. The proposed site would comply with many of the principles which the Plan has not considered in the assessment of the site, specifically:
(a) facilitate sustainable building standards - through development that maximises renewable resources, reduces carbon emissions promotion the use of renewable materials and the production of sustainably produced materials from local sources;
(b) sustainable transport links; and
(c) ensures local communities both rural and urban have sufficient quality homes for their needs including affordable housing.

Sustainable build standards
3.36 It is proposed that the development would, as far as practicable, maximise the use of renewable resources.
3.37 To further enhance the sustainable nature of the site the new dwellings will be constructed in accordance with 'The Code for Sustainable Homes' with the aim of achieving a minimum of a level rating in line with Council policy. Green energy production and waste disposal facilities could be considered to promote financially viable green alternatives such as biomass generators or solar tiles for inclusion in the development.

Sustainable transport links
3.38 An existing bus service provides an hourly link both to Chepstow and Newport from outside the Rock and Fountain public house which adjoins the site. The development is of a scale that the bus network could be improved to ensure sustainable modes of transport are available and the site is accessible by means other than private car.
3.39 The site is within walking and cycling distance of Penhow village (half a mile) and Llanvaches (1.5 mile) and has good transport link to the wider area as it is located on the A48 and within easy access of the M4.
3.40 Steeped in the heart of Welsh Policy is the ambition to build a rich cultural and healthy environment for residents and tourists alike to enjoy. The Wales Spatial Plan recognises the important role that Key Settlements will play in ensuring that sustainable communities promote Newport as a whole rather than as a City alone. Chepstow is one of the Key Settlements that has been identified; this is 20 minutes by car and 30 minutes by bus from the proposed site. It offers a plethora of learning and employment opportunities to its inhabitants. These resources could be tapped into by inhabitants of the proposed site. The South East Wales Transport Alliance should no doubt improve this already easy access to this integral town in South Wales.
3.41 The ultimate developers of the proposed site at Rock Farm would consider closely the Countryside Council for Wales’ objectives and ensure that any development on the site was sympathetic to the surroundings. Its location is ideal for marrying a healthy life in the countryside with a prosperous and fulfilled educational and employment career; all key contributors to a healthy and sustainable population.

Lack of rural housing supply
3.42 Paragraph 9.1.4 of PPW states that Development Plan policies should be based on an up-to-date assessment of the full range of housing requirements across the entire plan area and over the plan period. This is reflected in TAN 2 at paragraph 8.1. The Plan entirely fails to achieve this as it does not assess pockets of need or demand in smaller areas and instead focuses all allocations within the periphery of the City.
3.43 The proposed site represents an opportunity to secure an element of rural affordable housing. There is a genuine local need visible by the fact that households are migrating out of Newport and into Monmouthshire. The proposed site would help stop this from happening by meeting this need.
3.44 TAN 2 (2006) states that planning authorities should approach affordable housing need in an innovative way to maximise its supply. Newport is primarily made up of rural landscape, it would therefore seem logical to make some provision for market and affordable housing in the rural areas. This will discourage polarisation of the rural communities and cities.
3.45 At present there is no support for the rural economy due to a failure to assess local rural needs outside Newport City boundary. There has been an evident presumption, based on sustainability issues, that all housing need and demand should be focused into the City. However, from the sustainability assessment of the proposed site, (see Section 4 for details) it can be seen that in sustainability terms the site is comparable to other Brownfield sites that have been allocated within the Plan.
3.46 One significant reason that the proposed site failed to achieve a more accurate assessment of its sustainability is likely to be because it has been categorised into a group with another site. The
other site location (South View, Llanvaches) has different immediate surroundings and proximity to amenities and is being proposed as an open space site; the result being that the proposed site at Rock Farm achieves an artificially low score compared to when the site is considered in isolation. This has been addressed through the Sustainability Appraisal in section 4.

3.47 Paragraph 10.12 of T AN2 states that there must be adequate housing provision in rural areas to meet the needs of local people and contribute to the delivery of sustainable communities, however, the Plan does not identify rural housing need or clearly set out how it will contribute to meeting any identification of such. Furthermore paragraph 10.15 states that assessments need to be undertaken at ward or village level. There is a lack of evidence to support the fact that this has happened despite Welsh national policy stipulating that a full range of housing requirements across the whole plan area over the plan period should be assessed.

3.48 In recognition of its rural location the design of any development would recognise distinctive elements of living outside a settlement boundary. The preservation of existing boundary hedgerows with the additional planting of native species, and provision of open spaces within the development would enable some aspects of the original site to be retained. The location of the site adjacent to the quarry and the A48 would minimise landscape impacts and visual intrusion from the development of this site. It has the potential to support local businesses and create opportunities for diversification within the local economy by providing a much needed opportunity to ensure that workers are locally available, improve local facilities, particularly leisure and other activities as part of the overall development offering.

3.49 This site is not located within one of the identified Green Wedges or Green Belts so would have no adverse impact on SP6 and SP7 - Green Belt and Green Wedges. Policy SP10 - House Building Requirement:

3.50 This policy is considered unsound on the basis that provision for housing development outside settlement boundaries should be possible where conditions are imposed. The Welsh Spatial Plan (WSP) states that the projected population and household growth in Newport is significant (WSP paragraph 19.15) and that Newport is the economic gateway to Wales (WSP paragraph 19.11).

3.51 As previously noted, there has been insufficient assessment of the local housing needs in more rural areas of Newport. It is therefore questionable whether the Plan allocates housing in the right locations. The current allocations proposed allocations seem to be focused within the Newport City region and not further afield resulting in areas such as Penhow being given no opportunity for future housing provisions.

3.52 The proposed Rock Farm site would also be capable of bridging the divide between the proposed Newport development sites and Monmouth, Chepstow and Caldicot development sites.

3.53 Completions within the Newport region during the years 2010, 2011 and 2012 are currently 67% of the number that they were in the years 2007, 2008 and 2009. Because of the global economic recession many of the developments accepted into the UDP have stalled, there is still a decreased level of construction compared to several years ago and possibly a reluctance or inability to progress these projects towards completion. It also indicates a failure that existing developments can meet the actual demands and requirements of local people. As mentioned above many of the sites listed in the housing land supply are likely to be unviable and should not be included in the Plan's housing supply figures.

3.54 The proposed site is a sustainable alternative to large inner city redevelopment of Brownfield sites in the way of a smaller, local development, providing a unique housing opportunity which would be a welcome stimulant to the housing market.

3.55 Figure 24 of the LHMA states that there is currently a net affordable housing need for 1, 2 and 4 bedroom dwellings in the rural hinterland in Newport. This cannot be met exclusively by single strategic sites in Newport's more urban areas and should be met by diverse housing availability particularly in relation to larger 4 bedroom family homes. The proposed Rock Farm site is within the rural hinterland, immediately available for delivery and does not have the complications that are likely to arise from the use of other previously developed sites, for example the land would not need extensive decontamination, as may be the case for the Steel works site to the East of Newport centre, so a development timescale can be more confidently assessed.

3.56 In the eight years from 1999 the average property price rose by 165% in Newport. Paragraph 5.1 of the LHMA identifies that the affordable housing need equates to 593 units a year or 86% of the proposed 690 units in the Plan. Although the Plan states that it cannot meet this target the proposed site is large enough to have a significant number of affordable housing dwellings (at least 30% of the total housing built) that would help combat the current need for more affordable housing within the region.

3.57 In order to make Policy H1 sound Candidate Site 2074.C1 should be included within it.
### Representation Details

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3.58 Policy SP2 - Health:

3.59 This Policy would be adhered to and indeed be encouraged by the proposed site as it would allow households to experience a rural environment on a daily basis. This would be likely to promote health and well-being as it would encourage inhabitants to explore their local surroundings on foot and embrace countryside living. There has been some limited work on the connection between overcrowding and mental health reported in the Journal of Environmental Health Research (Volume 1; Issue 1: Poor Housing and Mental Health in the United Kingdom: Changing the Focus for Intervention, dated 2002), which suggest a correlation between depression psychological symptoms with overcrowding within a community. (Appendix 1). The ODPM have also undertaken research and published their findings. This document, The Impact of Overcrowding on Health and Education: A review of the Evidence and Literature also notes limited evidences links between overcrowding and poor physical and mental health in children and adults (Housing Research Summary Publication. Issue 210,2004). (Appendix 2).

3.60 Paragraph 3.3.2 of the LHMA states that one of the most common reasons people wanted to move was due to overcrowding with 10% of all applications to move on the common housing register being for this reason. Using Brownfield sites almost exclusively in the Plan will only serve to increase the density of the population, and the potential for overcrowding, within Newport.

3.61 H3 - Housing Mix and Density: The proposed site would add real value and measurable results to this Policy. The proposed site is large enough to accommodate some community facilities in addition to various dwelling sizes and types. This proposed site provides a valuable alternative to inner-city living. Surrounding the proposed site there is already a public house, several warehouse and an Indian take-away restaurant and a disused quarry. The development of the proposed site would provide housing for individuals working at any of these establishments as well as in the land area. Its size and location means that it can accommodate a range of areas in addition to housing, such as retail, leisure and, probably, live work units.

3.62 As noted above, at paragraph 3.58, there is some evidence to suggest that overcrowding contributes or worsens mental health problems. By creating new sustainable pockets of housing rather than infilling on brownfield sites, this small but significant correlation between overcrowding and mental health may be minimised.

### Sustainability Appraisal

4.1 As previously noted at paragraph 3.46 the Council's sustainability appraisal considered the proposed site at Rock Farm in conjunction with another site that is arguably less sustainable that the Rock Farm site. This resulted in the Rock Farm site sustainability figures being artificially suppressed. Taken in isolation the following assessment is believed to be a more accurate reflection of the site.

4.2 The Council's assessment has been revised to focus on the merits of the Candidate Site 2074.C1 at Rock Farm. The table below shows the Council's assessment and our assessment, where there is agreement, this is acknowledged, where there is a difference of opinion reasons are provided.

4.3 Previously the proposed site scored:

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It now scores:

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4.4 As a result of this assessment the proposed site scores considerably more favourably and is comparable with some sites which have emerged as housing land allocation.

4.5 The proposed site would also be compatible with wider regional and national policy as it would facilitate individuals to lead healthier lifestyles in rural areas, without impinging on Green Belt land or significantly changing the landscape of the surrounding area.
5 CONCLUSION

5.1 This representation has been prepared on behalf of Mr Rowland Crellin. It relates to land being promoted for development at Rock Farm, Penhow, adjacent to the disused Stone Quarry, several warehouse units and the Rock & Fountain Public House. The 8.5 hectare site is situated just north of the A48 and to the west of Pike Road.

5.2 Mr Crellin’s main objection to the Local Development Plan relates to Policies H1 and SP10. There is insufficient land allocation and housing planned across the whole county Borough area and the concentration of development sites being around the centre of Newport and to the east and west of Newport results in the housing allocation not being diverse enough. As a result, it will increasingly be difficult to meet the needs of all households. This may result in a sustained net migration out of Newport.

5.3 Newport has been recognised as the economic gateway to Wales and population and household numbers are expected to rise. Sufficient dwellings across the whole plan area therefore need to be provided. This is not currently provided for in the Local Development Plan, which fails to assess specific areas of local need or provide for a diverse range of housing locations.

5.4 The proposed site at Rock Farm would be an ideal location to allocate housing and to ensure that there is some provision made for affordable/rural housing in this area of Newport and to meet local needs. It has an existing transport system that could be easily modified to accommodate the increased usage and almost half the site is already surrounded by development to some degree, thereby allowing the development to be accommodated without significantly adversely impacting the wider rural surroundings.

5.5 It has been demonstrated that the proposed site is compatible with achieving the Sustainability Appraisal objectives.

5.6 It is respectfully submitted therefore that the failure to allocate Rock Farm Candidate Site 2074.C1 within Policy H1 is unsound and in order to make Policy H1 sound Rock Farm Candidate Site 2074.C1 should be included.

It is necessary to speak at the hearing in relation to the above to enable detailed discussion on housing figures and the merits of the candidate site.

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**Representation Details**

**by:** (No grouping)

**Filtered to show:** (all of) Stage=L; Status=M

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**Newport City Council Local Development Plan**

12/02/2014

Page 538 of 1581
Council Response

Justification of Requirement

Following representations at the Deposit LDP stage the housing requirement figure has been justified and increased from the proposed Welsh Government Population projections. There is scope for an authority to deviate from the WG population projections but this deviation is required to be well evidenced. The NLP assessment sets out this evidence base and illustrates that Newport, as one of the few areas in Wales with an anticipated population increase noted in the Census, is set to grow and reflects the Council’s policy aspiration for growth. It should be recognised that the majority of the sites (46 of 55) have planning permission or permission subject to a Section 106 agreement. This established supply with clear market intent illustrates not only that a growth strategy is appropriate but achievable.

Reliance on previous Development Plan sites

The Local Development Plan does have a number of housing sites which were identified within the Unitary Development Plan. In total there are 15 of the 55 housing sites which continue into the new plan. The majority of these sites have progressed significantly from the UDP, as a noted below:

1. Land adj. McReadys. As of 1st April 2013 the developer is on site preparing the site for development.
2. Eastern Expansion Area. Planning permission has been granted with a signed Section 106 agreement. Gallaghers Estates have confirmed through the JHLAS process that they will be delivering units on site in 2015.
3. Glebelands. This site has an extant planning permission associated with the school site adj to the residential area. The land has recently been sold to a developer.
4. Monmouthshire Bank Sidings. Redrow are on site and progressing.
5. Traston Lane. The site has planning permission and the agent has confirmed that they anticipate development on the site in 2015.
6. Pirelli. This site has been sold to the Seren Group (RSL) who launched the development in September 2013.
7. Ty Du Works. An application is being considered by the Council for a new scheme on the site.
8. Farmwood Close. This is an historic site with a LDC for the implementation of 10 units which have not been completed. The land is currently being marketed.
9. City Vision. The developer is on site and progressing.
10. Trinity View. The developer is on site and progressing.
11. Glan Llyn. The developer is on site and progressing. A third developer (St Modwen) are anticipating to being work on Phase 2 in 2015.
12. Mill Street. The site is owned by NCC who will market the site.
13. Herbert Road. This site is adjacent to the Glebeland site noted above. The site is compliant with the overall strategy of the LDP being a brownfield urban site in need of regeneration. There is no application on the site but the area land owner notes their intention to sell the site for development.
14. Whitehead Works. This site is part of a Welsh Government regeneration scheme, which anticipates delivery to begin in 2016.
15. Bideford Road. This site is compliant with the overall strategy of the LDP being a brownfield urban site with potential for regeneration. There is no application on the site but the area is the remaining part of a housing estate development.

The information above clearly shows that although there are a number of sites which have continued from one development plan to the other they have in the main progressed significantly or that they will be delivered within the plan period. It is also important to note that it was made clear through the UDP process that the growth proposed in the east of the city (i.e. Glan Llyn and Llanwern Village) was not anticipated to be delivered within the UDP plan period.

Delivery Rates

The Plan sets out the anticipated rate of delivery in Chapter 13 which illustrates that the total number of units is set to be delivered across the plan period. This in turn is established yearly through the Joint Housing Land Availability Study and monitored annually within the AMR. The effects of the economic recessions are still being felt within the housing market so it is therefore of no surprise that the plan anticipates a lower growth in the first period of the plan compared to the final ten years.

Deliverability and Supply

The Plan does however provide enough land to ensure that a 5 year supply is met and, that although the annual build rate is higher than currently achieved, even when taking into account the residual method of calculation the Council has provided an adequate supply of land which has been agreed with the industry through the JHLAS process. It should be noted that sites subject to the signing of a section 106 will not be considered within the calculation of the 5 year land supply as noted in TAN1. It is useful to note that such sites have been deemed appropriate for development by the Council having been permitted planning permission subject to a legal agreement, therefore they have been identified within the plan as sites which are compliant with the plans strategy and are considered to be deliverable within the plan period.

As illustrated above the perception that the Plan is overly reliant on sites inherited from the UDP period is not well founded. In addition a number of the sites outlined by the developer as being undevelopable are in fact progressing e.g. Alcan. Not all the sites noted are counted as part of the housing supply due to the lack of evidence of deliverability e.g. Newport Athletic Club. The Council has been realistic in its approach to the housing supply set out in the Plan which is based on the annual JHLAS process to ensure that the sites can be delivered to ensure the strategy is met.

12/02/2014
Range and Choice
The supply of housing is considered to provide for a clear range and choice of housing which is a clear concern for many representors. The housing sites within the Plan are located across the City, with a clear focus on regeneration in the east as per the established strategy. The Plan provides a supply of affordable units for a mixture of needs as well as providing a mix of family homes and inner city living to cater for the broad housing market. The opportunity to provide homes in more rural locations has been investigated and there was no clear evidence to justify expansion to existing settlements. No evidence has also been provided to support the representation that a site is required to bridge the division between Newport and Monmouth. Assessments of housing need take into account cross boundary issues. The Plan therefore has provided the opportunity for exception sites where such justification can be produced.

Flexibility
As the representation notes there is no set flexibility figure required for housing supply within development plans. However, during the examination of the Brecon Beacons National Park LDP WG noted a notional figure of 10% but that needed to reflect local circumstances. Other authorities within South East Wales have a range of 12-20% flexibility. It is good practice to allow for unknowns and the need for flexibility within a development plan is inherent from National Planning Policy. In Newport’s case the majority of the housing supply has planning permission or is being progressed. Those remaining 9 sites without planning permission are in line with the overall strategy or regeneration needs of the plan. Together they provide a 12% oversupply which is considered appropriate to enable to plan to cope with uncertainties that may arise over the plan period.

Health and Well being
The Plan recognises the impact development can have on health and well-being and provides a policy framework that ensures development takes into account those aspects which planning can impact upon e.g. provision of open space, amenity, density, pollution etc. The representation specifically mentions the concern of overcrowding as a reason for increased housing provision. The LHMA notes overcrowding as a reason for more housing but this is overcrowding within a particular property not the overcrowding of housing within an area, which this representation seems to imply. The density levels required are set based on the specific factors of the site but the Plan is clear that there is a need for family housing in Newport which will require a mix of densities depending on the sites needs and location.

Affordable Housing Provision
It is recognised that the required level of affordable housing for Newport cannot be met by the Plan alone. The level of supply which can be achieved through the implementation of the affordable housing policy in addition to those units already secured through the planning process has been clearly set out. It is not the sole responsibility of the planning system to meet the affordable housing requirement however the Plan does set a policy framework in order to achieve the highest level of affordable housing provision possible in both urban and rural areas.

Strategy compliance and delivery.
It is considered that the plan provides a more than adequate supply of housing, both market and affordable, which is both deliverable and viable.

The proposed site is located in a divorced location from the Llanvaches village boundary in an unsustainable location. The site is also within a Mineral Safeguarding Area and Special Landscape Area.

The plan seeks to promote the reuse of Brownfield sites in preference to extensive use of Greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities.

The forecast housing need has been assessed in the context of population and employment projections and current market realities. The Plan allocates more than sufficient land to meet this requirement. Additional housing allocations in a rural location cannot therefore be justified. Furthermore, the release of the representation site for housing would be contrary to the Council’s strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

It is recommended that this site is not included in the Local Development Plan for development.
Document: Revised LDP, p.91
Policy: R01
Summary: Support more flexible designation of the southern end of Commercial St and stronger emphasis on discouragement of out of town retail

Newport Unlimited notes the current extent of the Town Centre Shopping Area R1 as labelled on Inset 26 Newport City Centre. From a position of enhancing opportunities for regeneration, we would support the more flexible designation of the southern end of Commercial Street to allow uses in addition to retail. We would also support a stronger emphasis on the discouragement of out of town retail development throughout the document.

Council Response
Support for the revision to the extent of the secondary frontage along the southern end of Commercial Street noted. The Plan is quite clear in its City Centre first approach in Policy SP20 and R01. The remaining policies in the Retail Chapter seek to ensure retail developments outside the city centre are of an appropriate scale and do not impact on the vitality and viability of the City Centre. This approach is consistent with national guidance.
Spence, Mr Hugh  
C Architecture  
Accession No: 22/07/2013  
Type: E  
Mode: C  
Status: I  
Status Modified: M

Document: Revised LDP, p.65  
Policy: H01  
Summary: Include site to the north of the Cayo as a residential site.

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**Item Question**  
**Representation Text**

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<tr>
<td>i. No village development is proposed, which has the potential to stagnate rural communities;</td>
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<tr>
<td>ii. The plan moves away from the Preferred Strategy without clear explanation;</td>
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<tr>
<td>iii. The methodology in the background papers is erroneous because the Wales Spatial Plan promotes rural development; the Council’s Preferred Strategy accepted that village expansion could be appropriate; and Atkins’ ISAR regarded village expansion as sustainable; and</td>
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<td>iv. Our client’s site does not appear to have been given proper consideration in the preparation of the emerging plan.</td>
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Please see supporting statement
INTRODUCTION

1.1 This supporting document has been prepared by Malcolm Scott Consultants Limited on behalf of Mr Hugh Spence in relation to his Local Development Plan representation, originally submitted to the Council on 4th March 2010, for residential development at land south-east of Llanvaches.

1.2 The original submission ‘missed’ the Council’s initial ‘call for sites’ in 2008-2009, therefore a further submission was made to the Council early in 2011 together with a Sustainability Assessment which was completed in accordance with the methodology used by the Council’s sustainability consultants, Atkins.

1.3 It is understood that despite this second submission in 2011, the site has not received any formal assessment in the emerging plan, including the Settlement Methodology Paper (April 2012) which assesses which settlements would be suitable for development.

1.4 This revised proposal reflects the ongoing discussions Mr David Challinor of C-Architecture has had with the Planning Office during the intervening period, and this Report, supporting documents and plans, demonstrate the site is deliverable.

2. THE SITE

2.1 The site is located approximately 6.5 kilometres north-west of Caldicot, half a kilometre north of the A48 which links Chepstow in the east to Newport in the west. Drawing 116-SK005-A is presented at Appendix A. It shows the full extent of the site and the proposals which could be implemented on the site. City of Newport Map, showing the representation site in relation to other proposed sites in the authority’s area (taken from Newport’s Initial Sustainability Appraisal Report)

2.2 The site is located towards the south-east corner of the village of Llanvaches. Two areas of the site have been identified on the Council’s Candidate Sites forms as being suitable for residential development. A red line on drawing 116-SK005-A shows the site boundary and a green line indicates the proposed Phase 1 of development, on land which is contaminated.

2.3 The site is predominantly in agricultural use. However the north-easternmost extent of the site is contaminated from surface water run off from the highway, and cannot be used for the purposes of agriculture. This is discussed later in the report.

2.4 The total area of the site is approximately 1.75 hectares, and forms the northern section of a field which stretches from the village to The Cayo in the south-east.

2.5 The site is bordered on the northern perimeter by a stone wall. The remaining boundaries are contained by hedgerows. Tabernacle Road runs north to south along the site’s westerly perimeter, whilst the main village of Llanvaches is located to the immediate north and north-west of the site.

Photograph of site looking north from Tabernacle Road

2.6 The site lies immediately outside the settlement boundary of Llanvaches, and slopes gently downwards, predominantly north to south. To the north-east there is a small area of woodland which can be seen to the top right of the photograph above.

2.7 The existing road linking the village to the main Newport road (A48) is a narrow lane with vegetation on both sides which is not suitable for pedestrians and which is unsafe for both walkers and cyclists.

3. THE PROPOSAL

3.1 The proposed development remains a residential site, as set out in previous representations to the Council. The representation site will comprise sustainable/eco dwellings; a sustainable/eco landscape; a sustainable drainage system; significant public open space; and a public footpath to connect the village with the bus stop on the A48. The scheme...
seeks to create a ‘special public space’ that gives a sense of place and destination, which is safe and attractive and has its own identity. The eco landscape design aims to build upon the character and relationship of the whole site and surroundings in a sustainable way and to make distinctive memorable spaces.

3.2 The proposed development differs slightly from the previous representation which included a community facility in the village, for which the client understands there is little or no appetite amongst the local community. Therefore, to compensate for the removal of the community facility within the scheme, it is proposed to promote a significant amount of open space and sustainable landscaping will also be provided for the village to use.

3.3 Approximately 18 dwellings are proposed over the two sites. This is well below a generally accepted standard housing density of 30 per hectare, and reflects the low density housing in Llanvaches and the low impact nature of the proposed development.

3.4 The development is proposed to be phased. Two initial areas are identified below (as identified in red and green). The green area identifies Phase 1 of the residential development, as it seems logical to develop that area which is contaminated in the first instance.

3.5 The proposals, shown on the plan presented at Appendix A, also identify significant footpath improvements to link the site and the village with the A48, together with the eco landscaping and sustainable drainage system.

3.6 It is proposed the residential element could be a mix of types and tenures, designed to be eco-homes to suit the needs of the area or alternatively live/work units. The market housing element of the scheme will be ‘carbon neutral’ eco dwellings and the affordable housing element to be ‘eco dwellings’.

3.7 The original representation has been assessed through a sustainability appraisal which was prepared by Malcolm Scott Consultants during 2011.

4. POLICY
4.1 PLANNING POLICY WALES (PPW)
4.1.1 PPW provides the planning policy framework for the effective preparation of local planning authorities’ development plans. Chapter 2 Development Plans, Chapter 9 Housing, and the ‘Changes to Rural Planning Policy’ document are particularly relevant.

4.1.2 Paragraph 4.6.8 of the Changes to Rural Planning Policy is useful, given the need for affordable housing in Newport: ‘Development in the countryside should be located within and adjoining those settlements where it can be best be accommodated in terms of infrastructure, access and habitat and landscape conservation. Infilling or minor extensions to existing settlements may be acceptable in particular where it meets a local need for affordable housing.

4.1.3 We consider the representation site meets this aim, and the broad aims set out in Chapters 2 and 9 of the PPW.

4.2 WALES SPATIAL PLAN
4.2.1 The Wales Spatial Plan – People, Places, Futures – was originally adopted by the National Assembly for Wales in November 2004. This document has been continually updated and developed since its publication.

4.2.2 The purpose and principles of the Wales Spatial Plan are:
1. Making sure that decisions are taken with regard to their impact beyond the immediate sectoral or administrative boundaries and that the core values of sustainable development govern everything the Welsh Assembly does.
2. Setting the context for local and community planning.
3. Influencing where money is spent by the Welsh Assembly Government through an understanding of the roles of and interactions between places.
4. Providing a clear evidence base for the public, private and third sectors to develop policy and action.

4.2.3 The representation site does not conflict with any of these primary purposes of the plan.

4.3 TECHNICAL ADVICE NOTES (TANs)
4.3.1 TANs are the guidance notes which should be taken into account by local planning authorities when they are preparing development plans. Those Advice Notes which are considered to be of particular relevance are:

- Technical Advice Note (TAN) 15: Development and Flood Risk (2004);
- Technical Advice Note (TAN) 16: Sport, Recreation and Open Space (2009);
- Technical Advice Note (TAN) 18: Transport (2007);
- Technical Advice Note (TAN) 2: Planning and Affordable Housing (2006);

4.3.2 The representation site meets with the advice provided in the above documents, and is referred to specifically below in the remainder of the report.

5. LEGAL AND SOUND

5.1 In order for a plan to become part of the Development Plan it has to be found both legal and sound.

5.2 We query whether the Deposit Plan is sound as:
- No village development is proposed throughout the County Borough, which has the potential to stagnate rural communities;
- The plan moves away from the Council’s Preferred Strategy without clear explanation;
- The Background Papers have not formally assessed our client’s site.

5.3 Lack of Village Development

5.3.1 The Deposit Plan seeks to allocate no housing development throughout the rural villages of the Borough. This seems to stem from the Council’s assessment the Borough is relatively small and therefore always relatively close to an urban area. This is reflected in the quote below from paragraph 2.25 of the Plan:

“Newport is a relatively compact city, and the whole County Borough is only 13 miles from east to west, and only about 7 miles from north to south. Although 70% of the County Borough is rural, nowhere is therefore very far from the urban area, and this can be seen to reduce the justification for development in rural areas compared to what may be appropriate in more remote parts of Wales.”

5.3.2 Llanvaches is on the extreme eastern edge of the Borough. It is some 12 kilometres from the centre of Newport, and therefore cannot be said to be ‘not very far from the urban area’, even if it were to be accepted as a reason for not developing the villages in the Borough.

5.3.3 70% of the Borough is rural, and yet no growth of village settlements is provided in the Plan (with the exception of the Llanwern steelworks site which itself is essentially an expansion of the eastern side of Newport).

5.3.4 This lack of rural development conflicts with the Wales Spatial Plan. Paragraph 10.5 of the Wales Spatial Plan states: ‘Accommodating appropriate development in smaller settlements and rural areas is vital for supporting the development of more rural communities’.

5.3.5 The Wales Spatial Plan recognises the need to support rural settlements, and it is suggested, given Llanvaches is arguably the most rural of settlements in the Borough, it should be given the development it requires to maintain a thriving community.

5.3.6 The Deposit Plan makes no provision for village growth throughout the Borough. Policy SP10 of the Deposit Plan - House Building Requirement - is the relevant policy on the matter. It states that sufficient land will be made available for additional dwellings as follows: 2011 – 2016: 2,500; 2016 – 2021: 3,250; 2021 – 2026: 3,000. The land will be provided primarily on previously developed land, and gives no provision for development to expand rural settlements.

5.3.7 We suggest that in order for the Plan to be in accordance with Wales Spatial Plan, an element of village expansion should be included.

5.4 The Preferred Strategy 2008

5.4.1 The proposed policy of no village expansion is a direct conflict with the Preferred Strategy which was published in January 2008, which states at paragraph 2.68:

“There will be some villages where it may be appropriate to keep the boundaries drawn tightly with little scope for further development, while others may be suitable for some limited expansion on
the basis of sustaining local facilities, services and businesses, and providing affordable housing for local families and maintaining viable communities” (our emphasis).

5.4.2 It is unclear why this spatial policy has changed, given the consultation process during the preparation of the plan found ‘The widespread consultation on this issue proved that sustainable expansion of some villages may be appropriate’.

5.4.3 An Initial Sustainability Appraisal Report (ISAR) undertaken by Atkins in January 2010 found sustainable village development and village expansion were both considered to be sustainable options for future village development.

5.5 Background Papers: Settlement Boundary Methodology
5.5.1 Newport’s Settlement Boundary Methodology Paper published in April 2012 assesses 15 villages in the Borough. The Paper assesses whether existing boundaries reflect existing and proposed development form; whether the village represents the type of location the Preferred Strategy or the Local Development Plan identifies as suitable for future development; whether the location is a sustainable one; and any of the peripheral village boundary candidate sites are suitable for inclusion within the boundaries.

5.5.2 Questionnaires and presentations were undertaken to assess the villages, one of which was Llanvaches. Regarding Llanvaches, the paper states: “Given its remote location and lack of public transport, Llanvaches is not the type of village where development should be encouraged. The Preferred Strategy states that the Council will look to locate development on brownfield sites”

5.5.3 It should be noted the Preferred Strategy did not solely state that the Council will look to locate development on brownfield sites, it also looked to promote village expansion as set out above.

5.5.4 Therefore, a reason for discounting Llanvaches as a potential settlement for growth cannot be found in the Preferred Strategy, as the Preferred Strategy specifically stated village expansion could be a potential route forward. For this reason we consider the methodology to be flawed.

5.5.5 In addition, five candidate sites are listed in the Methodology Paper for Llanvaches: four from the Parish Council to protect sites in the village, and a further site to the rear of the Rock and Fountain Inn. Our client’s site does not appear to have been given any consideration as part of the assessment, as it is not listed. Therefore we question whether a proper and thorough assessment of the site, or other sites, have taken place. We understand this is primarily due to the original submission in 2010, being after the original call for sites, and even accounting for the second submission in early 2011, the site was not considered part of the formal process for the April 2012 Settlement Methodology Paper.

5.5.6 It is considered there should be clarification regarding the methodology used to undertake the background paper as the findings conflict with the Wales Spatial Plan regarding rural development; the Council’s Preferred Strategy acceptance that village expansion could be appropriate; Atkins’ ISAR regarding the sustainability of village expansion, and the fact our client’s site has not been given any consideration in the process.

6. SUSTAINABILITY OF SITE
6.1 Part of the site to the north of the land edged in green is contaminated from highway surface water run off. Neither the Highway Authority nor the County Council wish to take responsibility for the contamination. My client therefore is unable to use a significant portion of the site for agricultural use.

6.2 It is reasonable that the entire site is put to use in an effort to find an effective and efficient use of the land. Therefore, whilst the land is not technically brownfield, neither can it said to be truly greenfield due to the contamination, contamination which my client has no control over. Development of this part of the site as a first phase would seem logical. One of the main aims and improvement for the site is to address the excess water spillage onto the land and deal with this in a sustainable way.

6.3 The candidate site could readily accommodate the Plan’s suggested 30% affordable housing. Therefore 6 dwellings could be affordable housing.

6.4 Development could increase the range and choice of new housing available. The ISAR measured the sustainability of housing delivery and concluded the identification of new housing markets was considered the most sustainable option. Such trends that might evolve include a greater demand for live/work units, and the representation site would be ideally suited to accommodate such dwellings.

6.5 C-Architecture, the architectural practice promoting the site, is primarily concerned with state of the art sustainability practices and procedures and urban design. They are at the cutting edge of such architecture and envisage an extension to the settlement which promotes sustainable building techniques and landscaping, to set new standards in open space and building
design.

6.6 On a wider sustainability note, improvements can be made to link the site to the public transport system and a significant length of permanent permeable surfacing is proposed to link the A48 to our client’s site and the remainder of the village (this complies with the guidance set out in Technical Advice Note 18: Transport). The permeable footpath will be constructed to ensure additional flows are charged directly to the ground without detrimental surface run off to the highway. It is proposed the permeable path will complement the overall sustainable drainage system for the site.

6.7 In addition, the proposed path particularly links people by foot and cycle, especially for disabled, elderly and mothers (cycle being a sustainable mode of transport).

6.8 However, it is unrealistic and impractical to think people living in rural areas will not be totally reliant on the car. With fuel prices and movements towards electric powered cars, car reliance should not solely be seen as a spatial planning reason for determining a site or settlement is unsustainable. Clearly, if a person is able to generate sufficient renewable energy to power a vehicle, then the location cannot be unsustainable in terms of travel. Such development could be in accordance with Technical Advice Note (TAN) 8: Renewable Energy.

6.9 Sustainability has three main facets: environmental, economic, and social, and we suggest the representation site would meet all three, should a well designed scheme be proposed, to form a proposal that would build upon and strengthen the local community and provide a range of new housing types and sizes to cater for different age groups in response to the needs of the local community.

7. OTHER ISSUES

7.1 Flood Risk
7.1.1 The site is located in Flood Zone 1 of the Environment Agency’s Flood Risk Map. Therefore it is acceptable in terms of locating new development as set out in TAN 15. The Flood Risk Assessment which accompanies this submission demonstrates development of the site will not impact on flood risk.
7.1.2 Furthermore, a proposed sustainable drainage scheme will improve the manner in which storm water run off will be disposed. This has been a problem in the past. Existing flows from a proposed reservoir will be channelled and disposed of correctly with adequate flood storage included. New flows from the site will also be attenuated with flows returned to the ground, thus charging groundwater sources. Adequate treatment to enhance quality of discharge will also be instigated. The accompanying Flood Risk Assessment (FRA) details the drainage proposals for this site.

7.2 Ecology
7.2.1 The site is used for agriculture (where it is not contaminated). It is ploughed regularly and is therefore likely to be of little significance to ecology. Naturally the appropriate ecological assessments will be carried out prior to any planning application being submitted.

7.3 Transport
7.3.1 The roads to the site are good. The A48, a major classified road in the Borough, is only some 500m from the site. Therefore accessibility is good. It is not envisaged the development of the proposed site will impact on highway safety or the free flow of traffic on the highway.
7.3.2 There is also the opportunity for cycling or walking along the proposed footpath, which links to the A48. This will provide variety to the modes of transport available.

CONCLUSION

8.1 The overall site could potentially provide a far greater number of houses than is being proposed. Only approximately 18 dwellings are being proposed, as a significant amount of open space and sustainable landscaping is being provided for the use of the local community. This adheres to advice set out in Technical Advice Note 16: Sport, Recreation and Open Space.
8.2 C-Architecture’s drawing 116-SK005-A at Appendix A shows how the proposals could be phased, and link in sustainably with the existing transport system
8.3 Access to the site is good and the site proposal should not impact adversely on the highway network.
8.4 The allocation site is in Flood Zone 1 as identified on the Environment Agency’s flood risk map set out in the Flood Risk Assessment, and is suitable for development.
8.5 As the site is in continued arable use, any ecological impact will be limited. Appropriate ecological surveys and mitigation measures will be carried out accordingly. Further, the northern part of the site is contaminated and very unlikely to be of any ecological value.
8.6 It is suggested our client’s site rounds off this part of Llanvaches and provides a logical extension to the settlement boundary. The representation demonstrates the site is deliverable.

8.7 We consider the Deposit Plan is not sound as:
i. no village development is proposed, which has the potential to stagnate rural communities;
ii. the plan moves away from the Preferred Strategy without clear explanation;
iii. the methodology in the background papers is erroneous because the Wales Spatial Plan promotes rural development; the Council’s Preferred Strategy accepted that village expansion could be appropriate; and Atkins’ ISAR regarded village expansion as sustainable; and
iv. our client’s site does not appear to have been given proper consideration in the preparation of the emerging plan.

12 Speaking at Public Examination
In particular we would like to speak about the Council’s move away from spatial village expansion. We understand the Council has opted for a ‘brownfield’ only approach, but this is at the expense of the sustainability of villages in the Borough. We would also like to discuss the consideration which has been given to our client’s site during the plan preparation, as this appears to have been negligible. We would like to discuss the suitability of Llanvaches and naturally the deliverability of our client’s site, and the potential benefits which development of the site could offer the village. We consider speaking at the hearing will help the Inspector understand these issues.

Item Question
Soundness of LDP
Tick-box reply
No
The Council Response

The representation claims that the Plan has moved away from the Preferred Strategy because it does not allocate any village expansion. Through the consideration of the Strategic Options the Preferred Strategy concluded that some level of sustainable village expansion was an option. The strategy remains in favour of maintaining village communities.

Extensions to more isolated settlements such as the village areas within Newport have also been investigated. The preferred strategy set out that well evidenced sustainable village expansions would be considered, however none were considered appropriate. The plan does include a housing exception policy for affordable housing development within the countryside on the edge of existing settlements whereby providing the flexibility for the provision of a local housing requirement. Those applications which were considered as part of this review of village boundaries and potential extension plots have been assessed individually and the result of this assessment can be viewed in the Alternative Sites Assessment Report 2013 and the Settlement boundary methodology background paper 2013.

It is therefore considered that the LDP provides a balanced housing supply, concentrating on the continued sustainable use of previously developed land.

Over Reliance on Brownfield Sites

Planning Policy Wales sets out the overarching requirement for development to be placed on brownfield sites in preference to greenfield sites. The plan allocates 82% housing units on brownfield sites with the remaining 18% of units on greenfield sites (these calculations excludes the completions, windfall and small sites supply figures). The LDP is therefore compliant with Planning Policy Wales in terms that it has followed the search sequence criteria starting with the re-use of previously developed land and buildings within settlements which are located in areas accessible to jobs and services, where there is existing infrastructure and the scope to build sustainable communities.

The site at Cayo is located adjacent the Llanvaches Village Boundary, and is located in Countryside and Special Landscape Area designations.

The plan seeks to promote the reuse of Brownfield sites in preference to extensive use of Greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities.

The forecast housing need has been assessed in the context of population and employment projections and current market realities. The Plan allocates more than sufficient land to meet this requirement. Additional housing allocations in a rural location cannot therefore be justified. Furthermore, the release of the representation site for housing would be contrary to the Council’s strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

It is recommended that this site is not included in the Local Development Plan for development.

12/02/2014 Page 549 of 1581
### Representation Details

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**Document:** Revised LDP, p.65

**Policy:** H01

Summary: Proposed New Site at Greenmeadow Farm, Parc Seymour

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**Additional Information:**
- SA/SEA submitted
**Newport City Council Local Development Plan**

**Representative Details**

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On behalf of my Client, Mr David Padfield, the owner of the land identified on the attached plan, I wish to point out that the Revised Deposit Local Development Plan is unsound and needs to be changed.

The first of the Assembly Government's objectives for housing is:

"to provide more housing of the right type and offer more choice"

Furthermore, the Assembly Government will seek to ensure that:

"the overall result of new housing development in villages, towns or edge of settlement is a mix of affordable and market housing that retains, and where possible enhances important landscape and wildlife features in the development."

As openly indicated in the Revised Deposit Plan, the supply of housing is focused on brownfield sites and includes many of the sites that were included in the previous UDP. Indeed, several of the sites have had permission for many years and seem no nearer to be developed now. There appears to be a complacent attitude that few more sites need to be allocated, even though the end date for the Plan is 2026. Such a strategy is flawed because it provides insufficient choice, range and variety of sites with flexibility to deal with changing circumstances.

Also, National Government emphasis the need to make up the shortfall in affordable housing provision. The dependence on brownfield site, where developments costs are higher, is in danger of not producing the required affordable housing provision because of the threat to the viability of development.

While the Assembly Government encourages housing development on mainly brownfield sites within urban areas, it does not require housing allocations to be almost exclusively on such sites. It accepts that some greenfield development is necessary to provide a balance of development opportunities reflecting choice, range and variety. The Revised Deposit Plan provides for no housing beyond the urban boundaries. In particular there are no new allocations proposed to the east of The Coldra, within an extensive rural area which required new development opportunities to sustain itself and the few rural village facilities.

The last published Join Land Availability Study shows the City to have land available to provide a 7.0 year land supply when set against the UDP requirements. This figure is based upon build rates during the past 10 years but the built rates were constrained by insufficient range of sites available for early development, depending so much on regeneration of brownfield sites. The Council's current Revised Deposit Plan strategy is likely to suffer the same problems.

The Study showed that only 26% of the dwelling units were likely to be built within 5 years whereas over 74% would not become available until after the first 5 years. With the Council's additional allocations these are unlikely to address the need for a range of site available for development early in the Plan period to kick start the local and national economy.

The Plan would be made more sound with a modest allocation of greenfield sites which would address the above mentioned deficiencies. One such allocation would be that identified on the attached plan. It would form a logical and integrated western extension to the established Parc Seymour development and would help to sustain and grow the limited village facilities. The Coldra Roundabout has had major improvements to improve its capacity and further development at Parc Seymour will enhance the City's housing supply. There is and always has been a high demand for housing there and there are good public transport links with Newport.

While the land is largely open fields and hedgerows, its important landscape and ecological features can be retained and enhanced in development. Its allocation has the prospect of bringing forward early affordable housing provision and could accommodate local services and facilities as required.

National Government suggests a vigorous house building industry is needed to kick start a lethargic economy and initiatives have been commenced to encourage the planning process to allow a faster lead-in time to development. The Revised Deposit LDP proposals do little to provide a range of housing sites offering choice, variety and quality in the short term and flexibility to deal with changes in the circumstances. This site fronting the A48 will enhance the housing allocations and the development opportunities during the Plan period.

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Newport City Council Local Development Plan

Representation Details

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12/02/2014
Page 552 of 1581
Justification of Requirement
Following representations at the Deposit LDP stage the housing requirement figure has been justified and increased from the proposed Welsh Government Population projections. There is scope for an authority to deviate from the WG population projections but this deviation is required to be well evidenced. The NLP assessment sets out this evidence base and illustrates that Newport, as one of the few areas in Wales with an anticipated population increase noted in the Census, is set to grow and reflects the Council’s policy aspiration for growth. It should be recognised that the majority of the sites (46 of 55) have planning permission or permission subject to a Section 106 agreement. This established supply with clear market intent illustrates not only that a growth strategy is appropriate but achievable.

As noted above, the Plan identifies its housing requirement for the plan period based on an assessment of need and this is also true of its employment land requirements. The clear strategy for the Plan is for growth and it will be through the successful implementation of the policies of the Plan that this will be achieved. There is a clear link between housing supply and economic growth which is why the supply will be monitored annually.

Reliance on previous Development Plan sites
The Local Development Plan does have a number of housing sites which were identified within the Unitary Development Plan. In total there are 15 of the 55 housing sites which continue into the new plan. The majority of these sites have progressed significantly from the UDP, as noted below:

1. Land adj. McReadys. As of 1st April 2013 the developer is on site preparing the site for development.
2. Eastern Expansion Area. Planning permission has been granted with a signed Section 106 agreement. Gallagher Estates have confirmed through the JHLAS process that they will be delivering units on site in 2015.
3. Monmouthshire Bank Sidings. Redrow are on site and progressing.
4. Traston Lane. The site has planning permission and the agent has confirmed that they anticipate development on the site in 2015.
5. Pirelli. This site has been sold to the Seren Group (RSL) who launched the development in September 2013.
6. Ty Du Works. An application is being considered by the Council for a new scheme on the site.
7. Farmwood Close. This is an historic site with a LDC for the implementation of 10 units which have not been completed. The land is currently being marketed.
8. City Vision. The developer is on site and progressing.
9. Trinity View. The developer is on site and progressing.
10. Herbert Road. This site is adjacent to the Glebelands site noted above. The site is compliant with the overall strategy of the LDP being a brownfield urban site in need of regeneration. There is no application on the site but the area land owner notes their intention to sell the site for development. 14. Whitehead Works. This site is part of a Welsh Government regeneration scheme, which anticipates delivery to begin in 2016.
11. Glan Llyn. The developer is on site and progressing. A third developer (St Modwen) are anticipating to begin work on Phase 2 in 2015.
12. Mill Street. The site is owned by NCC who will market the site.
13. Bideford Road. This site is compliant with the overall strategy of the LDP being a brownfield urban site with potential for regeneration. There is no application on the site but the area is the remaining part of a housing estate development.

The information above clearly shows that although there are a number of sites which have continued from one development plan to the other they have in the main progressed significantly or that they will be delivered within the plan period. It is also important to note that it was made clear through the UDP process that the growth proposed in the east of the city (i.e. Glan Llyn and Llanwern Village) was not anticipated to be delivered wholly within the UDP plan period.

Affordable Housing
It is recognised that the required level of affordable housing for Newport cannot be met by the Plan alone. The level of supply which can be achieved through the implementation of the affordable housing policy in addition to those units already secured through the planning process has been clearly set out. It is not the sole responsibility of the planning system to meet the affordable housing requirement however the Plan does set a policy framework in order to achieve the highest level of affordable housing provision possible. Such provision has taken into account the viability of the policy threshold for affordable housing yet remains flexible to ensure that viability can be considered so that the housing market is not stifled by a non-negotiable approach to affordable housing provision.

Over reliance on previously developed sites
Planning Policy Wales sets out the overarching requirement for development to be placed on brownfield sites in preference to greenfield sites. The plan allocates 82% housing units on brownfield sites with the remaining 18% of units on greenfield sites (these calculations excludes the completions, windfall and small sites supply figures). The LDP is therefore compliant with Planning Policy Wales in terms that it has followed the search sequence criteria starting with the re-use of previously developed land and buildings within settlements which are located in areas accessible to jobs and services, where there is existing infrastructure and the scope to build sustainable communities.

Sites beyond the settlement boundary
As part of the development of the LDP sites were suggested for inclusion across Newport. Those applications have been assessed individually and the result of this assessment can be viewed in the Alternative Sites Assessment Report 2013. In addition to this work a review of boundaries, including Langstone, was undertaken the full details of which can be viewed in the Settlement boundary methodology background paper 2013.

Housing Land Supply
Based on a housing supply of 11,622 units over the LDP plan period the Council anticipate the following delivery rate:

- Completions to date (Oct 2012) = 5%
- Remaining completions between 2011-2015 = 25%
- Completions between 2016 – 2020 = 38%
- Completions between 2021 – 2026 = 19%
- Remaining 13% left to small site and windfall completions.

The plan sets out the anticipated rate of delivery in Chapter 13 which illustrates that the total number of units is set to be delivered across the plan period. This in turn is established yearly through the Joint Housing Land Availability Study and monitored annually within the AMR. The effects of the economic recessions are still being felt within the housing market so it is therefore of no surprise that the plan anticipates a lower growth in the first period of the plan compared to the final ten years.

It is considered by the Council that the Plan provides enough land that is both deliverable and viable which ensures a 5 year supply is met and, that although the annual build rate is higher than currently achieved, even when taking into account the residual method of calculation there is an adequate supply of land which has been agreed with the industry through the JHLAS process. Many of the sites have progressed since the Revised Deposit Plan was written and deliver rates will need to be taken from the most up to date JHLAS study process.

The annual monitoring process will consider the implementation of the policies within the Plan, including the delivery of housing allocations, including the overprovision of housing. The Plan sets out a supply based on a robust evidence base which reflects the key strategy for Newport of regeneration on brownfield sites. This prioritisation of the sustainable use of land will be undermined with the increased allocation of greenfield sites.

The site at Greenmeadow Farm is a greenfield site, located outside the village boundary and within a Special Landscape Area.

The site seeks to promote the reuse of Brownfield sites in preference to extensive use of Greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities.

The forecast housing need has been assessed in the context of population and employment projections and current market realities. The Plan allocates more than sufficient land to meet this requirement. Additional housing allocations in a rural location cannot therefore be justified. Furthermore, the release of the representation site for housing would be contrary to the Council’s strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

It is recommended that this site is not included in the Local Development Plan for development.
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Document: Revised LDP, p.109
Policy: CF08
Summary: Confirm comments made at deposit LDP stage have been dealt with in the Revised Deposit LDP.

**Item Question**

**Representation Text**

Only in respect of Leisure/Tourism CF8.

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**Council Response**

Comments noted.

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| 2323.L1//T05  | Beynon, Claire     | 26/06/2013 | ☐ | E | O | M |

Document: Revised LDP, p.89
Policy: T05
Summary: Object to further development in Caerleon on highway grounds.

**Item Question**

**Representation Text**

I would object to any new development in Caerleon, on the grounds that the traffic would increase, meaning more pollution for my children and less walking routes to school.

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<td>These concerns regarding general development in Caerleon are noted, but one must remember that applications for planning permission may only be assessed on an individual basis. For each proposal, the Council will consider, among other things, the potential impact on the local environment and highway network.</td>
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12/02/2014
### Document: Revised LDP, p.91

**Policy: R01**

Summary: Querying whether an impact of street furniture been undertaken and whether the chartist mural will be retained?

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1. Has an assessment been made concerning impact of street furniture eg Bollards on the visually impaired.
2. Will the Chartist mural been retained?

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### Item Question: Council Responses

The positioning of street furniture is not a Local Plan issue, however, an assessment has been undertaken as part of the on-going City Centre improvements. As part of this strategy the Council has reduced the amount of objects within the public realm that someone could potentially collide with. Trip hazards associated with trees have been removed; paving has been repaired; seating has been relocated to surround trees to reduce obstacles; numerous vertical elements have been removed and the total number of bollards has been reduced by more than 50%. The guidance about the use of Street furniture is vague because there is no definitive answer that can cover every situation in terms of the sightedness of an individual, the nature of the background, and the lighting conditions on a particular day.

With regards to the Chartist mural, an assessment has been undertaken by Cadw to determine whether it should be listed and therefore protected. Cadw has concluded that the mural should not be listed and it has therefore been removed as part of the city centre redevelopment proposals.
### Representation Details

**by:** (No grouping)

**Filtered to show:** (all of) Stage=L; Status=M

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**Document:** Revised LDP, p.24

**Policy:** SP10

**Summary:** Question why consideration of more development in Caerleon which has such ancient infrastructure

**Item Question**

To whom it may concern,

Last week I attended a packed public meeting to gain some clarification on the Deposit LDP.

The meeting was little more than pointless because,

1. After a half-hour introduction to the meeting, the audience was barred, by the chairman, from asking more than one question per person and discussion was not allowed.
2. The presenter's microphone was intermittent,
3. The presenter ignored my question which was a request for her to point out the position of the current border of the housing on Lodge Hill.
4. The projected map, to which my question referred, was so indistinct as to be unreadable - as it is on the NCC web site.
5. The chair person allowed an interruption from a person in the row behind forcing me to repeat the question which was again ignored.

I then remarked on the pointlessness of remaining at the meeting and left. It has come to my attention  that several others also left a little later on.

Because of the poor running of this meeting and confusing nature of the NCC website, I request that the Deposit LDP be postponed until all those interested are given full and clear information on the current LDP situation.

I find it impossible to understand,

1. why planning permission is even being considered for the building of more and yet more houses in an area which depends so heavily on its one-way system and ancient infrastructure,

**Item Question**

Concern noted. As part of the Local Development Plan process, landowners, groups and individuals are entitled to propose land for development. As part of the process each site is assessed, consulted upon and the benefits and constraints on the proposed development are considered. The concern over traffic and infrastructure are noted and have been considered as part of site assessments. The Candidate sites in this ward were considered fully and it was concluded that housing sites in most of the locations were not needed due to the high numbers of housing units available across the plan period to 2026. Information has been made available online and at two libraries in Caerleon. A number of well-attended community meetings have been held in the Caerleon ward. At these, both the proposals and the process have been discussed. It is regrettable that one or two people left before the presentation was completed and questions answered. To clarify, minimal development is proposed in Caerleon.
Representation Details

Newport City Council Local Development Plan

Summary: Question why Celtic Manor event traffic is allowed through Caerleon's one way system

---

**Item Question**

2) why the decision to disallow Celtic Manor event traffic in and out of the Usk Valley via the one-way system has been reversed - along with many of the other associated decisions,

---

**Council Response**

Specific event traffic arrangements are beyond the remit of the LDP. The traffic impact of future development proposals would however be assessed through the relevant policies of the plan and through the Council’s highway department.

---

Summary: Question why a mini supermarket is allowed in Caerleon at the Angel Hotel site

---

**Item Question**

3) why a mini supermarket is to be allowed to operate from the Angel public house site.

---

**Council Response**

The conversion of the Angel public house to a retail unit was considered by Newport City Council’s Planning Committee and granted planning permission in July 2012. Full details of all the considerations are set out in the Committee Report Ref: 11/0776.
**Representations**

**Item Question**

- **Representation Text**

  4) why consideration is being given, against council policy, to build on the remaining green fields of Lodge Hill - an area steeped in ancient history (See last attached picture to be aware how the amazing view over the newly-discovered Roman remains would disappear from the public footpath).

**Council Response**

The deposit Local Development Plan does not allocate land at Lodge Hill for development.

---

**Representation**

**Item Question**

- **Representation Text**

  Please seriously consider all the points above, in addition to an application by the Celtic Manor Resort who propose to build ten lodges for the provision of visitor accommodation within the Resort. before proceeding further.

**Council Response**

Planning permission for 10 lodges (ref: 12/0487) was granted with conditions during July 2012. All relevant matters were considered as part of the application and in consultation with the necessary statutory bodies.
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<td>Clifford, Mrs Tracey</td>
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Additional material submitted - Please click here

Document: Revised LDP, p.65

Policy: H01.07

Summary: Remove housing allocation at Bethesda Close and return to environmental space
I request that NCC Planning Dept withhold approving any future reserved matters on the planning application of Bethesda Field until the Welsh Planning Inspector has had time to read the revised LDP and decide whether there is a requirement for a third housing development upon a greenfield & designated environmental space, namely Bethesda Field, Rogerstone.

Bethesda Field, Rogerstone should not be developed and remain a designated environmental space. I note Asbri Planning requested the deletion of Bethesda Field’s environmental space status on the superseded LDP? I also note that NCC Planning has revised the new LDP to show Bethesda Place designated for housing. The Welsh Planning Inspectorate should now have the chance to review the new LDP and review the significance of losing a greenfield and designated environmental space to a third housing development and in view of 1026 new houses which was not taken into consideration at the Public Inquiry of Bethesda Field in July 2012.

I understand Walters Group has been given outline planning permission for at least 1000 houses to be built on the old Novelis/Alcan site which is a brownfield site.

A new planning application has been received for a new development of 26 affordable housing on another brownfield site within Rogerstone, formerly Dudley’s.

These two new housing developments will bring at least 1026 new houses to the area in 2014.

Both Jubilee Park & Dudley’s housing developments will be in very close proximity of Bethesda Field, Rogerstone.

At the Public Hearing in 2012, the Planning Inspector based point 17 of the Planning Appeal decision as one of the reasons for allowing a community owned greenfield to be developed for 22 houses. Point 17 states, 17. Planning Policy Wales (PPW) states that previously developed land should, wherever possible, be used in preference to Greenfield sites, particularly those of high agricultural or ecological value, but this is not an absolute embargo. Whilst the appeal site is Greenfield, it is not of high agricultural or ecological value. It is within settlement boundaries and in a highly sustainable location, being in close proximity to existing services, facilities, employment and public transport stops such that the proposal would minimise travel demands, particularly by private car. Objectors refer to two previously developed sites fairly close by, but one appears to have been acquired for commercial development and the other is unlikely to yield the number of residential units envisaged in the emerging Local Development Plan (LDP).

It must be pointed out from the Public Hearing that no more than 600 houses was going to be built on the Alcan site which is in c. 98 acres. The increase in housing is now more considerable than what was previously quoted at the hearing.

On the basis of this, I do not believe the LDP is sound on Bethesda Field. Since the Public Inquiry, matters of two new housing developments have arisen which were not taken into account at the Public Inquiry and I believe will now have a significant impact on Rogerstone and the loss of a greenfield which had designated environmental space status. No reserved matters have been currently approved on Bethesda Field planning application.

Therefore, I request that Bethesda Field reserved matters planning application is now put on hold until the Welsh Planning Inspector has chance to review the new revised LDP. This will give the Planning Inspectorate chance to review the matter and decide in the light of the two new major housing developments to Rogerstone in 2014 that a third housing development on Bethesda Field is not beneficial to the community and will result in an overbuilt urban community with the loss of a much needed greenfield/wedge/environmental space.

Bethesda Field should remain a greenfield utilising at least points 4.8 to 4.13 of the NCC revised LDP.

4.8 Environmental Spaces are predominantly located within the settlement boundary, however, there are a number located outside the settlement boundary and/or on land with other designations. The Environmental Space allocation adds an additional layer of protection to such sites, it does not replace them. All policy designations and associated Policies relating to a site will be considered in the determination of proposals that come forward on Environmental Spaces. Proposals will also be considered against other relevant Policies of the Plan, including the GP Policies.

4.9 Where possible these spaces are defined on the Proposals Map. However, this should not be viewed as a definitive list as there may be other green spaces that are important to the local community for the reasons set out above that have not been identified through the Local Development Plan process. Background Paper – Environmental Spaces 61 (footnote in LDP) sets out the process used to
identify the Environmental Spaces.  

4.10 A number of Environmental Spaces have also been identified as urban ‘quiet areas’ in the preparation of a Noise Action Plan. Such areas are protected against an increase in noise generated from development proposed on the site or nearby. Further details on the Noise Action Plan and quiet areas are set out in Chapter 13 of PPW and Policy GP7: Environmental Protection and Public Health.

4.11 One of the reasons for allocating many of the Environmental Spaces is their recreational value. Some sites will also therefore be protected under Policy CF1 – Protection of Playing Fields, Land and Buildings used for Leisure, Sport, Recreation and Play. These sites can be viewed in the Council’s Assessment of Outdoor Play Space Provision.

4.12 To safeguard green infrastructure resources Environmental Spaces should be protected from severance as the value of isolated areas is much less in wildlife and amenity terms than if the areas are linked. Further information will be provided in Supplementary Planning Guidance on Wildlife and Development.

4.13 Through masterplanning processes incorporated within the Design and Access Statement, opportunities could exist to safeguard existing open features and to create new areas for amenity, nature conservation and recreation provision within key development sites. Opportunities may also arise to enhance existing provision, either through specific improvement schemes or through the redevelopment of neighbouring or nearby land.

4.14 The Natural Resources Wales (NRW) has developed a toolkit to help ensure everyone in Wales has access to natural greenspace. In accordance with NRW’s guidance, an assessment of accessible natural greenspace has been undertaken. This analysis together with the Assessment of Outdoor Play Space and other related documents, such as the Local Biodiversity Action Plan will be used to help inform decisions relating to opportunities to increase or enhance existing levels of provision. This could be achieved through design measures such as improved access points and link routes into an existing site or enhanced landscape and environmental improvements, such as tree planting. Additional provision will be sought on new development sites, where there are known deficiencies in an area.

Bethesda Field is the only field left in this part of Rogerstone and in a vicinity of a sprawling urban settlement of houses. It will remain a beneficial field for wildlife habitat as well as a protected semi ancient woodland. It will also serve as a much needed visual break and green wedge against an ever increasing urban Rogerstone which is growing out of character and once called a ‘village’.

The NCC Ecology Officer has also recently confirmed that Bethesda Field is an example of a ‘meadow’.

I also request that my previous comments relating to Bethesda Field on the previous LDP is carried forward to the new revised LDP.

Rep 2992.D2 - Previous comments relating to Bethesda Field

Within Rogerstone, I am passionate that Bethesda Field is protected now and for the future as a designated ‘environmental space’ or utilised as a greenfield for the health & wellbeing of the local community to enjoy for eg, allotments/small livestock holdings (chickens). My attached documents will provide reasons for saving this field.

I would rather see the focus site re-utilised as a new train station. There is already adequate car parking & the railtrack is already in use and very close to the focus site. This would situate the new train station, not far from where the very old station used to be situated, near Havana Bakeries. It would also benefit the wider community who live centrally in Rogerstone.

Additional Information Submitted - Available on Request
To clarify, the site in question is not a new housing allocation. The Plan simply reflects its status as a Housing Commitment. The site was granted outline planning permission on appeal by the Planning Inspectorate. A Reserved Matters application is currently being considered by Newport City Council under the adopted Unitary Development Plan. This outline permission and any future reserved matter applications will not be reviewed by an Inspector as part of the LDP process because this is not the purpose of the LDP process.

We consider that the plan has failed to be delivered in accordance with the delivery agreement including the community involvement scheme because a new policy has been introduced M1 (SP22) which incorporates the land adjacent to Longleat Chepstow Road. The policy identifies the land as having a sand and gravel resource however no sound ecological study has been done to ascertain the true facts in relation to this and no consultation has been undertaken with the owners of the site. Through our own ecological survey, historic reports do not necessarily agree with this assumption.

The sand and gravel safeguarding areas have been identified from the Aggregates Safeguarding map of Wales undertaken by British Geological Surveys. Any proposed development would be required to investigate the resource and ensure that it was not sterilised. This designation is a planning consideration that does not necessarily prohibit development but assessments are required to investigate whether a finite resource is affected and the relevant management undertaken. An ecological survey is not needed to identify whether or not an aggregate resource exists. Consultation on this allocation has taken place when the Revised Deposit Plan was put out to consultation in June 2013, which resulted in this response.
### Representation Details

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Additional material submitted

Document: Revised LDP, p.65

Policy: H01

Map: Proposals East: Proposals Plan - East

Summary: Propose amendment to settlement boundary for the provision of land for two to three properties.

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| 10   | Soundness Test            | Procedural (P1), Coherent and effectiveness (CE2 and CE4)                                                                                         |

Coherence and effectiveness test CE2+CE4

Housing policy H1 is not realistic and appropriate as it has not been founded on a robust and credible base. The majority of housing land within the proposed plan is identified on brownfield sites, although it is recognised that a number of these sites are presently being developed a large proportion still remain undeveloped due to the complexities of bringing these sites forward. It is therefore important that the plan also identifies sites that can easily be developed within the plan period which means that the balance between Greenfield and brownfield development needs to be balanced. It is our opinion that the plan fails to adequately address this issue.

Hence it does not comply with test CE4 as it is not a flexible plan that can deal with changing circumstances.
Proposed change: Extension to the urban settlement adjacent to Longleat Llanbedr for a small development of two to three properties.

Although this site is identified within open countryside we do not feel that it will have an adverse impact for the following reasons:

The site would result in the urban boundary being slightly extended. The impact would be minimal as it is located at the end of a residential street that has seen extensive extensions and new build in recent years. The development of the site will not result in opening up the countryside to further development as the site would be accessed off the old Chepstow Road and does not result in a new access being developed. Newport city council highways have noted that the site can be accessed from the public highway. Presently the site is used for storage and is open grassland, consequently the natural boundary to the open countryside is the stream and woodland that is located on the southern boundary.

The mature trees are located on the southern boundary it is not proposed that this area is developed but protected to enhance the ecology within the area. The land to the south of the site is in the same ownership it is proposed that the woodland acts as the natural urban boundary and is protected to ensure that ecological interests are maintained and enhanced. It is proposed that this could be conditioned within any detailed planning application. The development of this site will NOT impact upon any existing tree preservation orders or public rights of way. Please see the ecological survey which is attached.

The development of this site will help to sustain the local community for the following reasons:

The site is equi-distance from Newport and Chepstow railway stations. Severn Tunnel Junction is also within easy access, thus providing rail links to major conurbations in both England and Wales. Severn Junction is 7.1 miles away, Newport Station is 6.9 miles away and Chepstow station is 10.2 miles away.

The nearest shops are a post office which also general provisions located at Parc Seymour and Langston Garage which also sells general provisions, both are 1 mile from the site. In addition Chepstow Town centre is located 10 miles away, whilst the retail centres of Spytty and Newport City Centre are also located nearby.

The conurbations of Bristol, Chepstow and Newport are within easy location of the site with good public transport links and highway links, thus making access to jobs and community services extremely accessible.

A cycleway and walkway are located on the adjacent A48.

The bus stop is located on the adjacent A48 approximately 275 metres away, the no.73 runs hourly and from the shelter at Tregarn Rd, the X14 is also hourly.

Local Primary school located in the community.

So consequently the local planning authorities conclusion to the request to include this as a candidate site that brownfield sites are more sustainable than greenfield sites cannot be argued on this occasion as this development will help to reduce the need to travel by car, will make best use of existing infrastructure, both physical and social and help to maintain the existing community. Also attached are letters of support from residents within the neighbourhood.

There have been no objections to the proposed development due to infrastructure limitations, Welsh Water have confirmed that the local sewer network can accommodate the foul flows from this development.

Although there have been 5 representations objecting to the development of the site, these are general objections against any development within the open countryside as previously stated we do not feel that this site can be classified as open countryside due to its current storage use and location on an urban street scene which has seen significant developments over the last 4 to 5 years. Consequently the development of this site would not set a precedence as it would literally be seen as the rounding off of the existing street scene and would not have any visual impact on the surrounding landscape.

Paragraph or section number(s): H1 5.1-5.3, SP5 2.21-2.22
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Planning Policy Wales sets out the overarching requirement for development to be placed on brownfield sites in preference to greenfield sites. The plan allocates 82% housing units on brownfield sites with the remaining 18% of units on greenfield sites (these calculations excludes the completions, windfall and small sites supply figures). The LDP is therefore compliant with Planning Policy Wales in terms that it has followed the search sequence criteria starting with the re-use of previously developed land and buildings within settlements which are located in areas accessible to jobs and services, where there is existing infrastructure and the scope to build sustainable communities.

Extensions to more isolated settlements such as the village areas within Newport have also been investigated. The preferred strategy set out that well evidenced sustainable village expansions would be considered, however none were considered appropriate. The plan does include a housing exception policy for affordable housing development within the countryside on the edge of existing settlements whereby providing the flexibility for the provision of a local housing requirement. Those applications which were considered as part of this review of village boundaries and potential extension plots have been assessed individually and the result of this assessment can be viewed in the Alternative Sites Assessment Report 2013 and the Settlement boundary methodology background paper 2013.

It is therefore considered that the LDP provides a balanced housing supply, concentrating on the continued sustainable use of previously developed land.

Delivery Rates
The Plan sets out the anticipated rate of delivery in Chapter 13 which illustrates that the total number of units is set to be delivered across the plan period. This in turn is established yearly through the Joint Housing Land Availability Study and monitored annually within the AMR. The effects of the economic recessions are still being felt within the housing market so it is therefore of no surprise that the plan anticipates a lower growth in the first period of the plan compared to the final ten years.

Deliverability and Supply
The Plan does however provide enough land to ensure that a 5 year supply is met and, that although the annual build rate is higher than currently achieved, even when taking into account the residual method of calculation the Council has provided an adequate supply of land which has been agreed with the industry through the JHLAS process. It should be noted that sites subject to the signing of a section 106 will not be considered within the calculation of the 5 year land supply as noted in TAN1. It is useful to note that such sites have been deemed appropriate for development by the Council having been permitted planning permission subject to a legal agreement, therefore they have been identified within the plan as sites which are compliant with the plans strategy and are considered to be deliverable within the plan period. The Council has been realistic in its approach to the housing supply set out in the Plan which is based on the annual JHLAS process to ensure that the sites can be delivered to ensure the strategy is met.

Range and Choice
The supply of housing is considered to provide for a clear range and choice of housing which is a clear concern for many representors. The housing sites within the Plan are located across the City, with a clear focus on regeneration in the east as per the established strategy. The Plan provides a supply of affordable units for a mixture of needs as well as providing a mix of family homes and inner city living to cater for the broad housing market. The opportunity to provide homes in more rural locations has been investigated and there was no clear evidence to justify expansion to existing settlements. No evidence has also been provided to support the representation that a site is required to bridge the division between Newport and Monmouth. Assessments of housing need take into account cross boundary issues. The Plan therefore has provided the opportunity for exception sites where such justification can be produced.

It is considered that the plan provides a more than adequate supply of housing, both market and affordable, which is both deliverable and viable.

The plan seeks to promote the reuse of Brownfield sites in preference to extensive use of Greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities.

The forecast housing need has been assessed in the context of population and employment projections and current market realities. The plan allocates sufficient land to meet this requirement. Additional housing allocations in a rural location cannot therefore be justified.

It is recommended that this site at Longleat is not included in the Local Development Plan for development.
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Document: Revised LDP, p.24
Policy: SP10
Summary: Asking for more flexibility in Policy SP10 to allow development of site adjacent to Longleat on Chepstow Road

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<tr>
<th>Item Question</th>
<th>Representation Text</th>
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<tr>
<td>10</td>
<td>I believe that the plan does not meet the test of soundness in relation to CE2 and CE4 Coherence and Effectiveness tests for the following reasons:</td>
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<td>CE2: The strategy, policies and allocations are not realistic and are inappropriate as they have not considered relevant alternatives and are not founded on a robust and credible evidence base as there is an over reliance on brownfield sites that have major upfront infrastructure costs.</td>
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<td>CE4: The Plan is not reasonably flexible to enable it to deal with changing circumstances as the over reliance on these major brownfield sites has not taken into account the economic climate and the reduced profitably margins, thus making a numerator of these sites economically unviable.</td>
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<td>Housing Objective 4 states that new housing will be provided mainly on brownfield sites with an emphasis being placed on the Eastern Expansion Area, and yet a key task of the plan is also to ensure a continuing supply on large brownfield sites with the requirement for major infrastructure works at a considerable cost means that the assumption that a continuing supply of land will be made available is questionable.</td>
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12 Speaking at Public Examination

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<thead>
<tr>
<th>Item Question</th>
<th>Council Responses</th>
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<td>2 Soundness of LDP</td>
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<th>Item Question</th>
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12/02/2014
Over the plan period 57% of residential allocation will be located in the east as defined in the strategy paper, 27% will be located in the central area, and 16% in the west. The largest proportion of residential development is proposed in the eastern area, with Glan Llyn and Llanwern Village accounting for a large proportion of this. The Unitary Development Plan sought to concentrate development on brownfield land in the eastern area of the city. The continued concentration of the majority of residential development in this area is a legacy of the aspiration of the Unitary Development Plan and a reflection of the brownfield led strategy of the Local Development Plan.

The amount of development in the central area is a reflection of the on-going regeneration of the central area of Newport. Newport Unlimited Urban Regeneration Company prepared a Central Area Master Plan (originally produced in 2003/04 and refreshed in 2010/11) which sets out the proposals for the regeneration of the central Newport area. The concentration of residential development is a legacy of this plan, and a reflection of the brownfield led strategy of the Local Development Plan.

The smaller percentage of residential development in the western area is a reflection of the character of the area which includes fewer brownfield sites. However there are a number of sites proposed in the area the biggest of which is the former Alcan aluminium factory site.

There is a spread of sites throughout Newport which provide a range of choice of house types and locations. In proposing that new homes should be predominantly developed in the core urban area with a good level of service provision, the Council’s approach follows guidance in PPW. In the case of large brownfield sites, such as Glan Llyn, the amount of housing proposed will serve to drive demand for local services, shops and facilities.

The two main residential sites in the East (Glan Llyn and Llanwern Village) are considered annually as part of the Joint Housing Land Availability Study.

Planning Policy Wales sets out the overarching requirement for development to be placed on brownfield sites in preference to greenfield sites. The plan allocates 82% housing units on brownfield sites with the remaining 18% of units on greenfield sites (these calculations excludes the completions, windfall and small sites supply figures). The LDP is therefore compliant with Planning Policy Wales in terms that it has followed the search sequence criteria starting with the re-use of previously developed land and buildings within settlements which are located in areas accessible to jobs and services, where there is existing infrastructure and the scope to build sustainable communities

The plan seeks to promote the reuse of Brownfield sites in preference to extensive use of Greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities.

The forecast housing need has been assessed in the context of population and employment projections and current market realities. The plan allocates sufficient land to meet this requirement. Additional housing allocations in a rural location cannot therefore be justified.

It is recommended that this site at Longleat is not included in the Local Development Plan for development.
Soundness Test

I believe that the plan does not meet the test of soundness in relation to CE2 and CE4 Coherence and Effectiveness tests for the following reasons:

CE2: The strategy, policies and allocations are not realistic and are inappropriate as they have not considered relevant alternatives and area not founded on a robust and credible evidence base as there is an over reliance on brownfield sites that have major upfront infrastructure costs.

CE4: The Plan is not reasonably flexible to enable it to deal with changing circumstances as the over reliance on these major brownfield sites had not taken into account the economic climate and the reduced profitability margins, thus making a number of these sites economically unviable.

Representation

The present economic downturn has resulted in a number of major sites as these becoming uneconomically viable due to the major upfront costs required to turn these sites into developable land. A number of these sites did not come into fruition in the more prosperous period, which resulted in a building boom, therefore the 1100 units indentified within policy H6 for the Eastern Expansion Area are not likely to be developed by 1st April 2026.

In order for these to be reasonable flexibility to enable the plan to deal with changing circumstances such as the economic climate smaller, readily available sites need to be indentified.

Council Response

The Llanwern Village development, which forms part of the Eastern Expansion Area, identifies 1100 units to be developed within the plan period. This is based on confirmation from Gallaghers Estates who have made it clear to the Council that they are committed to progress the site and start on site within the next 2 years. The plan does provide a 12% to allow for changes in circumstances. Any new or alternative sites have been dealt with via separate representation and will be reported within the Assessment of Alternative Sites Report. The major sites referred to are otherwise almost all currently being developed.
**Representation Details**

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Additional material submitted: SA/SEA submitted

**Document:** Revised LDP, p.65

**Policy:** H01

**Map:** Proposals East: Proposals Plan - East

**Summary:** Inclusion of land adjacent to Longleat on Chepstow Road as a housing allocation in Policy H1.

---

**Item Question** | **Representation Text**
--- | ---
5 5 | Add a new site
11 11 | Representation

I am therefore proposing that a smaller site should be included off Chepstow Road adjacent to Longleat (the land once formed part of the cartilage of this property). Consequently the inclusion of the site would necessitate a minor amendment to the urban boundary. The impact would be minimal as it is located at the end of a residential street that has seen major extensions and developments in recent years, thus effectively creating a natural rounding off to this residential street, reflecting a similar development at the opposite end of the road.

The development of this site would not result in opening up the countryside to further development as the site can be readily accessed off Old Chepstow Road with the physical boundary being the natural features of the woodland and stream that is located on the southern boundary. The inclusion of this site will make the urban boundary more robust because it will eliminate further access landscape with woodland boundaries.

The site is located close to community facilities: schools and public transport and therefore complies with the sustainability criteria. The report highlights the potential for protected species and the mitigation that can be taken. The site is not prone to flooding.

Additional information submitted - Available on Request.

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**Item Question** | **Tick-box reply**
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12 12 | Speaking at Public Examination

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**Item Question** | **Tick-box reply**
--- | ---
2 2 | Soundness of LDP

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12/02/2014
### Representation Details

**by:** (No grouping)  
**Filtered to show:** (all of) Stage=L; Status=M  

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**Document:** Revised LDP, p.76  
**Policy:** H16.01  
**Summary:** Objection to Hartridge Farm Road Gypsy and Travellers Site because of proposed use as health centre, flood risk and SINC.

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*Additional material submitted - Please click here*
Flood Risk Hartridge Farm Road

Background

Development Plans and TAN15

Flood risk is considered to be a material factor in the formulation of specific development plan policies and the allocation of sites. Local authorities are required to fully explain and justify the reasons for allocating a site in Zone C.

To justify such an allocation the authority must undertake a broad level of assessment of the consequences of flooding occurring on that site in consultation with the Environment Agency. If the consequences are considered acceptable, the resulting allocation should include an annotation of flooding as a constraint for the site on the proposals map and specify the policy requirements which pertain to its development.

H17 Gypsy and Traveller Accommodation Proposals

PROPOSALS FOR GYPSY AND TRAVELLER CARAVAN SITES, INCLUDING ON LAND OUTSIDE DEFINED SETTLEMENT BOUNDARIES, WILL BE PERMITTED PROVIDED:

(i) THE SITE IS WELL RELATED TO SUITABLE COMMUNITY FACILITIES AND SERVICES FOR THE PROSPECTIVE OCCUPANTS;
(ii) THE SITE IS CAPABLE OF BEING SERVED BY UTILITIES INCLUDING WASTE DISPOSAL AND RECOVERY AND EMERGENCY SERVICES;
(iii) THE SITE IS NOT WITHIN AREAS AT HIGH RISK OF FLOODING, GIVEN THE PARTICULAR VULNERABILITY OF CARAVANS;
(iv) THE SITE COMPLIES WITH OTHER ENVIRONMENTAL AND GENERAL POLICIES OF THIS PLAN ESPECIALLY WITH REGARD TO RESIDENTIAL AMENITY AND HIGHWAY SAFETY.

The details above are an extract from the NCC Gypsy and Travellers Background Paper.

Gypsy and Travellers Sites: Scrutiny Consultation

The following is an extract from the Scrutiny Committees findings dated 29 Dec 2012

Short-listing Criteria

The Policy Review Group used criteria from a number of different sources in drawing up the short list of sites, namely:

•Welsh Government Circular 30/2007: Planning for Gypsy and Traveller Caravan Sites
•Good Practice Guide in Designing Gypsy and Traveller Sites in Wales, July 2009

Taking those sources into consideration, sites were assessed against the following criteria:

•C1/C2 flood risk areas
•Sites of Special Scientific Interest / conservation areas
•Green wedge / green belt
•Hazards on site
•Existing use (e.g. local amenity, environmental space)
•Proximity to local facilities (health services, schools, shops)
•Vehicular access to site
There is no mention of the C1 flood risk at the Hartridge Farm Road site in the report. This important factor has been totally omitted and not taken into account when regarding the suitability of the site. This contravenes the Welsh Government Circular 30/2007: Planning for Gypsy and Traveller Caravan Sites. Other sites namely the Pye Corner former army barracks were dismissed because of the C1 flood risk. The former speedway was also dismissed and the C1 flood risk was mentioned as one of the factors. Since there is no mention of the C1 flood risk for the Hartridge Farm Road site at the time the scrutiny report made its recommendations the authority has not undertaken a broad level of assessment of the consequences of flooding occurring on that site in consultation with the Environment Agency. This is in contravention of TAN15.

URS Infrastructure & Environment UK Limited did undertake a Stage 2 strategic Flood Consequence Assessment of the 11 gypsy and travellers sites but that was not until December 2012 after the scrutiny committee had made its findings. The data and advice that the scrutiny committee based its decisions on was deficient, its conclusion flawed and in contravention of TAN 15. Fig1. Zones C1 flood risk map

The council has not fully explained and justified the reasons for allocating a site in Zone C. Which again is in contravention of TAN15. Local Planning Authorities have a duty to direct development away from such areas this has been sited as a reason for refusing site allocations in the ‘Report of all Representations at Deposit Plan Stage April 2012’ (candidate Site ref 302.C1)At all the public consultations there was no mention by council officials of the C1 flood risk which is present at the Hartridge Farm Road site. At the Ringland Ward LDP consultation the following plan Fig2 was produced by the council’s Development Services Manager Mark Hand. By comparing Fig1 the Zones C1 flood risk map with the proposed site plan drawn up by the council’s planning officer Fig2 it is evident that a number of pitches are present in the C1 flood zone.

This contravenes the advice given in TAN15. I estimate that at least 13 pitches are in the C1 flood Zone these are pitches 11A through to 23A. If a worst case scenario is taken using this plan as an indicative example of what the site layout will be then the site does not provide the required number of pitches to accommodate all three Gypsy families. One of the main reasons this site was chosen. It also does not provide the required number of pitches for the future. The plan illustrates the complete lack of understanding of TAN15 in the planning department and clearly the DAM and C1 flood information available has not been used or acted upon as required. The buffer zone in the plan is merely there at the request of the railway and because there is a major gas main at the southern edge which cannot be disturbed.

There has been no mention of the increased risk of flooding due to surface run off that will be caused by the development of the site the “Newport City Council - Preliminary Flood Risk Assessment April 2011” identifies a significant flooding event in the Zone B area of Fig1 at Ringland Circle where 28 properties were flooded. I believe that significant parts of the Hartridge Farm Road site are in the Zone B area as well as the C1 area this fact being masked in Fig1 by the C1 area.

The covering of the Hartridge Farm Road site with impervious material to form the pitches is going to lead to surface run off and a significant increase in the flood risk for properties in the Zone B flood area.

Threat to adjacent SINC site due to contaminated surface run-off water. The Ringland Marsh is an important habitat and has been designated a SINC. Contamination of the ecosystem by contaminated surface water run-off could threaten the important rare species that inhabit the marshland including Cetti’s warbler and reed bunting (a UKBAP Priority Species).

Tests of Soundness of the LDP

Objection to proposal as the LDP is deficient on the grounds of soundness as it does meet the following tests:

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.

No regard has been made to the use of the land as the East Newport Health and Social Care Centre even though at the time the scrutiny committee made its decision the land was included as an alternative site in the LDP ref AS(A)026. No mention is made of this alternative use for the land in the report from the scrutiny committee. This land use was not considered The LDP is therefore deficient and fails the C1 soundness test.

The housing act 2004 requires that the council assess the housing needs of the Gypsy and Traveller community and engage in cross regional and sub regional discussions. There is no evidence in the LDP that such regional and sub regional discussion on the housing needs of the Gypsy and Travellers has taken place.
In 2010 Cardiff City Council took the unprecedented step of withdrawing its local development plan (LDP) following criticism of many of its key elements by Welsh Assembly Government planning inspectors. The inspectors complained there was too much emphasis on flats and not enough provision for affordable homes. They also voiced concern that the supply of employment land would not keep up with the projected growth of the city and criticised the lack of provision for gypsies and travellers.

Cardiff City Council at this point in time only have a ‘Working Draft, No Status’ version of the Deposit Plan. They have appointed Opinion Research Services/Peter Brett Associates to undertake a Gypsy and Traveller Study. This report is due to be considered by Cardiff City Council in September 2013.

In a document dated 11th January 2013 titled “Response to Consultation on the Cardiff Local Development Plan 2006-2026 Preferred Strategy” authored by Mark Hand – Development Services Manager for Newport City Council it states in point 4:

“Cardiff’s Gypsy and Traveller accommodation needs to be fully quantified as part of the LDP process. There are a number of families currently residing in Newport with strong affiliations to the Cardiff City Council area and cross-boundary working is necessary to properly assess housing need and the associated duty to meet that need.”

As the Cardiff LDP consultation process has not been completed and the housing requirement of the Gypsy and Travellers has not been identified by Cardiff City Council then the need for the 43 pitches at the Hartridge Farm Road site cannot be fully justified as the need may be in an area across the Newport City boundary in the Cardiff City area.

As it currently stands the LDP is deficient as Newport City Council has not engage in cross regional and sub regional discussions on the housing requirements of the Gypsy and Travellers as the Cardiff City consultation has not been completed and the needs in that area have not been quantified. The Newport City LDP therefore fails the C1 test.

C2 - It has regard to national policy.

The proposal to use the Hartridge Farm Road Site which is partly within a C1 flood zone is in contravention of the advice in TAN 15 and Welsh Government Circular 30/2007: Planning for Gypsy and Traveller Caravan Sites.

The proposed indicative site plan presented to the residents at the Ringland Ward LDP presentation clearly shows pitches sited in the C1 flood zone.

TAN 15 states:
Flood risk is considered to be a material factor in the formulation of specific development plan policies and the allocation of sites. Local authorities are required to fully explain and justify the reasons for allocating a site in Zone C.

To justify such an allocation the authority must undertake a broad level of assessment of the consequences of flooding occurring on that site in consultation with the Environment Agency. If the consequences are considered acceptable, the resulting allocation should include an annotation of flooding as a constraint for the site on the proposals map and specify the policy requirements which pertain to its development.

There is no such annotation of the flooding at the Hartridge Farm Road site as a constraint on the proposals map and no specification of the policy requirements which pertain to its development. The LDP therefore fails the C2 test.

The threat to the adjacent Ringland Marsh SINC site from contaminated surface water run off and its effect on the ecosystem of the Ringland Marsh has not been taken into account and the threat to the Cetti’s warbler and reed bunting (a UKBAP Priority Species). This was not considered by the scrutiny committee when selecting the Hartridge Farm Road site.

UK BAP priority species were those that were identified as being the most threatened and requiring conservation action under the UK Biodiversity Action Plan (UK BAP).

The LDP contravenes the UK Biodiversity Action Plan (UK BAP) and therefore fails the C2 soundness test.
CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust and credible evidence.

There are alternative sites that are not in a C1 flood zone and should have been given higher consideration as a suitable site for the Gypsy and Traveller residential site by the scrutiny committee. As the C1 flood risk was not considered at all by the scrutiny committee and the alternative use of the land as the East Newport Health and Social Care Centre was not considered then the evidence base was not credible or robust. This fails the CE2 soundness test.

Item Question  Council Responses

13

There are no flood risk issues at Hartridge Farm Road providing a buffer is left at the southern edge of the site adjacent to the railway. The indicative layout plan allows for this.

Impact on nearby environmental designations will be assessed through the planning application process and appropriate mitigation measures agreed where necessary.

The Council has a duty under the Housing Act 2004 to identify the need within its area for Gypsy and Traveller sites. The methodology used to establish this need is set out in the Newport Gypsy and Traveller Accommodation Needs Assessment undertaken by Fordham Consultants. The Scrutiny Process which considered which sites should meet this need considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process. As part of the Fordham Assessment research, interviews were conducted with neighbouring residents in order to discuss and establish the impact of cross-boundary movements. The outcomes were factored into the conclusions and recommendations of the report. The Council must provide sites to meet the need identified for families within its area that require accommodation. Sites should be allocated within the relevant Authority's area, not in a neighbouring Authority, in the same way as each Authority is required to meet its bricks and mortar housing needs within its own LDP. There have been informal discussions with South East Wales Authorities about establishing a regional network of transit sites, however there is clear evidence that a transit site is needed within Newport. There is no report yet produced.

Consideration was given to 2012 Alternative Site proposals as part of the Scrutiny Committee's site identification and appraisal (see report dated 24 April 2013 in the background paper). The reference in Newport City Council's response to Cardiff's emerging 'no status' plan to Gypsy and Traveller families living within Newport but with ties to Cardiff relates to a small number of site on the western Levels. This comment did not relate to the three families identified by the Council as being families that the Council has a duty to accommodate and who are proposed to be accommodated at the Hartridge Farm Road site.
Item Question  Representation Text

5  5 Add a new site
Ringland Shopping Centre to become a District Centre

11  11 Representation

The revised LDP is deficient in that it removes Ringland District Shopping Centre and reclassify it as a local shopping area contrary to advice contained in TAN 4.

Revised LDP document: District Centres Deposit Plan background paper April 2012

Colliers International Assessment of the Newport's District Centres in particular Ringland District Centre is inaccurate and incorrect with respect to advice given in TAN 4.

TAN 4 Definition of District shopping Centres and Local Centres:

District shopping centres - groups of shops, separate from the town centre, usually containing at least one food supermarket or superstore, and non-retail services such as banks, building societies and restaurants.

Local centre - small grouping usually comprising a newsagent, a general grocery store, a sub-post office and occasionally a pharmacy, a hairdresser and other small shops of a local nature.

Ringland Shopping area clearly qualifies as a district shopping centre meeting the criteria as outlined in TAN 4 above.

It contains a Cost Cutter Supermarket part of the Cost Cutter Supermarket Group. This retail type is not present in the definition of a Local centre.

Colliers state:
Newport City Homes occupy a large unit in the corner of the shopping precinct (units 8 – 11); however, at present this is positioned outside of the district centre boundary.

There is no explanation as to why this large section of the Ringland Shopping Centre is outside the district centre boundary. When the Ringland Shopping Centre conceived, planned and built in the 1960's units 8-11 (a large section of the centre) were and still are an integral part of the district centre courtyard. Units 8-11 are the East Area Headquarters of Newport City Homes and their literature states that "The office can be entered through the main shopping area". The presence of this large A2 classification unit reinforces further the status of this area as a District Shopping Centre.

Conclusion

The classification of Ringland District Shopping Centre as a District Shopping Centre as defined in TAN 4 should remain and the advice of Colliers International should be ignored and removed from the revised LDP.

Item Question  Council Responses

13  13 Council Response

No change proposed. The Council's supporting evidence for the district/local centre classifications is set out in the Colliers Retail Assessment (June 2010). This concludes that the Ringland shopping centre functions as a local centre, serving the local community. It is acknowledged, however, that Units 8 - 11 form part of the centre.
Representation Details

by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M

Rep'n/Para/Policy Representer Agent Accession No Date Lodged Late? Source Type Mode Status Status Modified

3029.L3/CE09 Williams, Mr Dafydd 28/07/2013 E O M

Document: Revised LDP, p.58
Policy: CE09
Summary: LDP does not include areas that should be designated as a SINC

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The LDP is deficient in that it does not include areas that should be designated as SINC sites. Habitat assessments have not been undertaken for these areas.

This fails the C2 test of soundness.

it does not It does not have regard for the following national policies:

Technical Advice Note 5: (2009) TAN 5 notes that one of the key principles of positive planning for nature conservation is for the planning system to control development so that it 'provides a net benefit for biodiversity with no significant loss of habitats or populations of species, locally or nationally' (Para 2.1). It goes on to outline the important role that this local scale of designation has in contributing to the quality of life and well being of communities. In addition to this national level policy, the Council has produced Supplementary Planning Guidance on Wildlife and Development (March 2010). This document also recognises the requirement for developers to have clear consideration to a SINC designation and provides detailed guidance as how to achieve that.

Local Sites in Ringland have not been identified against the advice of TAN 5.

The Local Biodiversity Action Plan (LBAP) has not been followed.

Guidelines for the Selection of Wildlife Sites in Wales has not been used on several sites in Ringland as habitat assessments have not been undertaken.

Revised LDP document – Sites of Importance for Nature Conservation (SINC)

Deposit plan 2012

This document does not include important sites in the Ringland ward that qualify on habitat flora and fauna grounds.

Areas missing from Ringland Ward SINC Register.

Remedial Action.

Carry out thorough habitat assessments for the areas missing from the SINC site register.

Land Off Sterndale Bennett Road

H5 Neutral grassland

H5:1 Lowland Meadow with indicator species:
Urtica dioica (Stinging Nettles), Trifolium pratense (red clover), Arrhenatherum elatius (false oats), Holcus lanatus (Yorkshire fog), Agrostis capillaris (common bent), Cynosurus cristatus (crested dog's tail). Ant hills.

H1 Woodland with indicator species:
bluebells, Anemone nemorosa (wood anemone),
Anum maculatum (lords and ladies)
Green corridor and stepping stone to Hartridge Wood SINC.
Part of the habitat network of Ringland.

S1 Hedgehog: Site supporting breeding and foraging for hedgehogs.

S2 Tree Sparrow, Lesser Spotted Woodpecker.
Land Off Dunstable Road
H5 Neutral grassland.
H5:1 Lowland Meadow with indicator species:
Urtica dioica (Stinging Nettles), Trifolium pratense (red clover), Arrhenatherum elatius (false oats), Holcus lanatus (Yorkshire fog), Agrostis capillaris (common bent), Cynosurus cristatus (crested dog's tail).
H2 Woodland with indicator species:
bluebells, Anemone nemorosa (wood anemone), Arum maculatum (lords and ladies)
Green corridor and stepping stone between Laydyhill Wood SINC and Ringland Wood SINC
Part of the habitat network of Ringland.
Remnants of Ancient Woodland with several veteran oaks one with girth over 150 inches indicating age excess of 200 years.
H2:1 Ancient hedge bordering Ringland Junior School playing field
H2:1 Ancient hedge bordering the back of housing in Dowland close.
S1 Bats: Vital flight and commuting route and priority feeding area attached to roosts.
S2 Tree Sparrow, House Sparrow, Lesser Spotted Woodpecker.

Land North Of Ringland Circle (19 Hills)
H5 Neutral grassland with indicator species:
Trifolium pratense (red clover), Arrhenatherum elatius (false oats), Holcus lanatus (Yorkshire fog), Agrostis capillaris (common bent), Cynosurus cristatus (crested dog's tail). Ant hills.
H12:1 Stream. A fresh water stream traverses the length of the area with adjacent semi-natural habitat veteran trees.
S5 Dragonflies.
The area has recently had a wetland site created with shallow ponds for newts, frogs and dragonflies. A wild flower meadow area has also been created.

Item Question Council Responses

Council Response
The Council's Green Team has confirmed that the sites highlighted will be added to the list of possible sites for designation as SINC's, and will be considered when the survey season begins in the spring. If any of the sites are in 'danger' of imminent development it is possible to prioritise.
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Additional material submitted - Please click here

Document: Revised LDP, p.114
Policy: M01
Summary: Objection to the allocation of safeguarding mineral resources in Langstone
Thank you most kindly for your email dated 13 June 2013 notifying me of the latest revisions to the Newport Deposit Local Development Plan (LDP 2011/2026) which highlights the new introduction to areas of land in and around Langstone designated as 'Sand and gravel resource'. The following comments would apply to all respective areas indicated in the attached map extracted from the LDP denoted by either red circles or a red rectangle, of which my property and many others are unfortunately located in the latter as engulfed by respective proposals.

Whilst any reasonable member of the public would understand the difficulties faced by all Local Authorities in designating land for particular use, in respect the above subject matter the residents of Langstone sincerely share a common belief that recent modifications incorporated in the latest LDP in respect to designating land in Langstone and surrounding areas for sand and gravel extraction as inappropriate and not carefully thought through, merely addressing a potential requirement imposed by the Welsh Assembly to consider areas in respect to ultimately, sand and gravel extraction. I am sure all Local Authorities are capable of creating wish lists detailing desirable and valuable resources to be sourced locally (e.g. sand/gravel), however, is this practical or indeed necessary given such resources are extensively available on the marked from elsewhere.

It may be worth noting from the attached extract taken from NCC’s latest LDP that said land proposed for potential sand and gravel extraction is immediately adjacent to and surrounds residential areas and roads for which the following points give great cause for concern/alarm should respective proposals go ahead, which serve to diminish the qualities associated with living in a village community.

1) Excessive and prolonged noise and airborne dust pollution will not be sufficiently containable by any barrier or sprinkler systems.
2) The local road network would not cater for the additional heavy load traffic associated with commercial quarrying causing further congestion and maintenance costs (to the tax payer) including increased exposure to accidents.
3) House prices will most definitely reduce and substantially, as a consequence of simply designating respective areas for quarrying in the LDP, given undesirable proximity issues.
4) Health and safety would be a major concern especially in respect to inquisitive children residing in the village with a desire to enter the quarry as their ‘playground’, irrespective of any fence system installed.
5) Future land reinstatement opens avenues into potential landfill/waste site facilities with undesirable consequences in respect to smell, vermin, traffic and the like.
6) The attraction of living in Langstone will diminish considerable. Indeed, I have decided that enough is enough and have been driven into putting my property onto the market for sale as of mid July 2013 following proposals in respect to; the Oak Court development immediately opposite my property, followed by a gypsy site to the rear of my property and the latest issue engulfing my property, which is addressed by this letter. For the record, NCC’s original LDP designated respective areas of land as countryside, as it should remain. The question begs, what other proposals are yet to be tabled by NCC and/or prospective developers in respect to Langstone and surrounding areas in the LDP. History would indicate further prolonged distress is to follow.
7) Evidently as defined by the attached plan, the proposed area allocated to potential sand and gravel extraction is in aggregate almost (if not) the same size (m2) as the village of Langstone itself. Is it anticipated by NCC that Langstone should now become a village associated with heavy and extensive quarrying, despite the fact the village is designated a residential area, the latter of which is the prime reason for residents locating to Langstone.
8) Can NCC condone land to the front and rear of properties as being designated for quarrying purposes without due consideration to occupiers of respective properties e.g. land within the circles and rectangles of the attached map. Furthermore, should proposal go ahead, village communications would be severed (e.g. Chepstow Road as would be the nearby motorway).

Furthermore, has NCC determined via suitable investigations that respective areas are suitable for commercial quarrying in terms of volume, quality of product and location etc. and have corresponding studies been carried out.

In conclusion, Langstone residents are thoroughly disheartened and frustrated with NCC in respect to its revised LDP as relative to the aforementioned issues with thoroughly discourage living in the village and indeed surrounding areas. Nonetheless, there is hope that NCC will take note of its shortcomings in respect to this particular issue and exclude the potential for quarrying in the village and surrounding areas such as to re-establish credibility in NCC amongst those affected by current proposals.
Sand and gravel supply in South East Wales is currently focussed predominantly on marine reserves. The ability to rely on this source in the future is under question. It is therefore especially important that where possible resources of land won sand and gravel are identified and protected. The LDP has identified areas of potential sand and gravel resource as supplied by the British Geological Survey’s work for the Welsh Government on producing the Safeguarding Resource Map for Wales.

Those mineral resources within Newport that can be identified as a potential resource have been designated and safeguarded within the plan. The detailed suitability of this resource for use as an aggregate is currently unknown. The mineral resource area designation is an indication of a potential mineral resource only. Further work is required to assess whether the area is suitable for mineral workings to be undertaken. Developers would be required to provide information on the resource including detailed borehole information and satisfy national planning policy and the relevant Policies within the Plan.

The concerns raised in this representation would be relevant to any future decision on whether or not extraction can and should take place. However the LDP must identify and protect reserves identified by British Geological Surveys.

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<tr>
<th>Item Question</th>
<th>Representation Text</th>
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<tr>
<td>5 5</td>
<td>Add a new site</td>
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<tr>
<td>11 11</td>
<td>Representation</td>
</tr>
<tr>
<td></td>
<td>My first preference is for the original 5 gipsy and traveller sites allocated on the original draft LDP to remain as the allocated sites. If that first preference isn't accepted my the Council I wish to offer the following comments on the Revised LDP.</td>
</tr>
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<tr>
<th>Item Question</th>
<th>Council Responses</th>
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<tr>
<td>13 13</td>
<td>Council Response</td>
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<tr>
<td></td>
<td>Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.</td>
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### Representation Details

**Filtered to show:** (all of) Stage=L; Status=M  
by: (No grouping)

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<td>Anderton, Mr Paul</td>
<td></td>
<td>26/06/2013</td>
<td>S M</td>
<td></td>
<td>E S</td>
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|                    | Document:Revised LDP, p.75  
Policy: General G&T  
Summary: Support Policies H15, H16 and H17 as the least worst options.  
**Item Question**  
**Representation Text**

1. I support Policies H15, H16 and H17 as the least worst options. The Langstone sites are too small, unsuitable, too close to existing residential development and are too far from amenities. In addition the Gipsy community do not support the Langstone sites and do not wish to be split up.

---

**Item Question**  
**Council Responses**

**Support noted.**

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<tr>
<th>3042.L3//SP05</th>
<th>Anderton, Mr Paul</th>
<th></th>
<th>26/06/2013</th>
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</table>
| Document:Revised LDP, p.21  
Policy: SP05  
Summary: Support the countryside allocation on land adjacent to Oak Court.  
**Item Question**  
**Representation Text**

2. I support Policy SP5 and the allocation of the land north of the A48 (locally known as the Gorelands site and Oak Court) as countryside. All other brownfield sites should be developed before any greenfield sites which should be protected from development.

I understand that the prospective developer has indicated that the Langstone community support development on Gorelands and Oak Court. Nothing could be further from the truth. A substantial proportion of residents do not support such development and believe they should remain as greenfield sites. I also believe they should remain greenfield sites and should not be developed. Sufficient sites have been allocated as housing in the Revised LDP and I support that.

---

**Item Question**  
**Council Responses**

**Support noted.**
3070.L1//SP10

Woodland Amenities (Rogerstone) Ltd.,

Additional material submitted - Please click here

Document: Revised LDP, p.24
Policy: SP10
Summary: Oppose proposed development at Risca Road sites

---

The majority of the land in both proposals is not owned by the applicant, who does not act for the owners.

Representation

I would like to see the plan changed to exclude all land owned by Woodland Amenities (Rogerstone) Ltd. This company is not a client of R.E Phillips and Partners and have so informed them in writing.

I return herewith, on behalf of the above Company, the completed representations form on the Revised Deposit Newport Local Development Plan 2011-2026.

We are at a loss to understand why our land has, yet again, been included in this Plan as we have already told both R.E Phillips and Partners you, the Planning Department, that the land we own is not for development by Phillips and Partners.

Many years ago, in the 1980's, R.E. Phillips and Partners offered to represent our land with theirs in any application they made for development. They, of course, had an ulterior motive in doing this. They, or their clients, own the old Ty Melyn allotment site. They also own the small piece of land which gives onto Pontymason Land at the canal bridge and on which their application for development was refused on appeal some years ago. Our land lies between their two parcels of land and is the bigger. Their first application, Risca Road 1, 2073.C1, includes all of our land and their two parcels. Their Risca road 2, 2703.C2, uses all of our land behind the houses in Woodlands drive and includes their parcel up to Pontymason Lane. It excludes the old Ty Melyn site and our land to the north of Ty Melyn.

Any association with R.E Phillips and Partners was very tenuous and informal, at best and ceased many years ago. They have been informed of this and I enclose letters that have been sent to them asking them not to include Woodland Amenities (Rogerstone) Ltd, in any of their applications. They have clearly decided to ignore this.

I believe this to be a cynical ploy as they are obviously aware that all our land and their Ty Melyn site is regarded by yourselves as Green wedge. Additionally, in 2011/2012, all of our land and the Ty Melyn site was declared a Site of Importance to Nature Conservation (SINC). Should either of their applications be granted, R. Phillips will no doubt make us a fantastic offer for our land and then hit us with an equally fantastic bill for our share of the development costs.

I have written to yourselves informing you that we are in no way clients of R.Philips and Partners. We have never made any applications in respect of our land because of the information supplied by you - ie that any application made would be strongly resisted. I attach copies of correspondence between us and yourselves and us and R.E Phillips.

I ask that you refuse the applications made R.Philips and Partners on behalf of clients as we are not their clients and this is basically untrue. They have also pressed on with their application despite the fact that they are aware of our wishes.
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<th>Item Question</th>
<th>Council Responses</th>
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<tr>
<td>2 2</td>
<td>Soundness of LDP</td>
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</table>
Council Response

The sites (2073.C1&C2) were submitted as Candidate Sites and were not included within the Deposit LDP. Part of sites 2073.C1&2 were submitted for development and considered as an Alternative Site AS(N)053. Following an assessment of the site it was concluded that:

'The candidate site is a Greenfield site located outside of the urban area of Rogerstone. The site is identified as a Green Wedge and Countryside in the Deposit Local Development Plan. There are a number of environmental constraints associated with the site including a SINC designation and a South East Wales Biodiversity Records Centre record.

The forecast housing need has been assessed in the context of population and employment projections and current market realities. The plan allocates sufficient land to meet this requirement. Additional housing allocations in a rural location cannot therefore be justified. Furthermore, the release of the representation site for housing would be contrary to the Council’s strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8. The release of the representation site for housing would also be contrary to the Council's strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council's strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

The plan seeks to promote the reuse of brownfield sites in preference to extensive use of greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities. Notwithstanding the representation submitted in support of this alternative site, the Council maintains the position adopted at the Candidate Site stage and considers that the LDP is sound and relies on the evidence which supports it. In this respect, the Council does not support this Alternative Site.'

Therefore, the site has not been included for residential development and remains allocated as Greenwedge and Countryside.

The land in question forms part of candidate sites 2073.C1 and 2073.C2 and the following conclusion was reached when those sites were assessed at the candidate site stage.

The candidate site is a Greenfield site located outside of the urban area of Rogerstone. The site is identified as a Green Wedge and Countryside in the Deposit Local Development Plan.

There are a number of environmental constraints associated with the site including a SINC designation and a South East Wales Biodiversity Records Centre record.

The forecast housing need has been assessed in the context of population and employment projections and current market realities. The plan allocates sufficient land to meet this requirement. Additional housing allocations in a rural location cannot therefore be justified. Furthermore, the release of the representation site for housing would be contrary to the Council’s strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

The release of the representation site for housing would also be contrary to the Council's strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council's strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

The plan seeks to promote the reuse of brownfield sites in preference to extensive use of greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities.

Notwithstanding the representation submitted in support of this alternative site, the Council maintains the position adopted at the Candidate Site stage and considers that the LDP is sound and relies on the evidence which supports it. In this respect, the Council does not support the allocation of the land in question. It is noted that, in any case, much of the site is not realistically available based on this objection from the land owner.
### Representation Details

**by:** (No grouping)  
**Filtered to show:** (all of) Stage=L; Status=M

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<td>Asbri Planning</td>
<td>26/07/2013</td>
<td>E O I M</td>
<td>SA/SEA submitted</td>
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**Document:** Revised LDP, p.22  
**Policy:** SP07  
**Summary:** Proposal of new site at Ty Mawr Lane, Marshfield - objections to Policy SP7, SP8, SP5, SP10, H1

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<td>Soundness Test</td>
<td>No</td>
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<tr>
<td>11</td>
<td>Representation</td>
<td>It is clear that the inclusion of the site within a proposed green wedge is contrary to the above as its development would not prejudice the gap which exists between Newport and Marshfield and existing development already extends further to the north and east. On this basis Policy SP7 is objected to. See attached Submission Document and Sustainability Appraisal</td>
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<td>12</td>
<td>Speaking at Public Examination</td>
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<tr>
<td>2</td>
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**Council Responses**

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<th>Item</th>
<th>Question</th>
<th>Council Response</th>
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<tbody>
<tr>
<td>13</td>
<td>Council Response</td>
<td>No change. In relation to the appropriateness of the site for inclusion in the Green Wedge allocation it is considered that the allocation of this area is in accordance with the purpose of Green Wedge as set out in Planning Policy Wales. It is considered that the area of land does serve to prevent the coalescence of two settlements (Newport and Cardiff), and assists in safeguarding the countryside from encroachment. It is also considered that the allocation of this area is in accordance with Planning Policy Wales in that normal planning and development management policies cannot provide the necessary protection (a countryside designation would not have the same level of control over certain types of development for example extensions to houses). It is considered that only land that is strictly necessary to fulfil the purposes of the policy has been provided in the designation based on the purpose of Green Wedge as identified in PPW. In this instance the openness of the land is considered important. Piecemeal removal of parts of the Green Wedge within the boundary of Newport would serve to undermine the intention of the various Green Wedge designations in the area.</td>
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12/02/2014
### Representation Details

**Rep'n/Para/Policy** | **Representor** | **Agent** | **Accession No** | **Date Lodged** | **Late?** | **Source** | **Type** | **Mode** | **Status** | **Status Modified**
--- | --- | --- | --- | --- | --- | --- | --- | --- | --- | ---
3074.L2//SP08 | Jones, Mr Stephen | Asbri Planning | | 26/07/2013 | | | E | O | I | M | SA/SEA submitted

**Document:** Revised LDP, p.22  
**Policy:** SP08  
**Summary:** Proposal of new site at Ty Mawr Lane, Marshfield - objections to Policy SP7, SP8, SP5, SP10, H1

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<tr>
<td>11</td>
<td>11</td>
<td>Representation: Policy SP8 - Special Landscape Area is objected to on the grounds that the contained nature of the site separates it from the wider areas of open countryside to the east and south, whether the SLA designation is more appropriate in being applied to the distinctive character of the Wentlooge Levels. See attached submission document and sustainability appraisal.</td>
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| 12   | 12       | Speaking at Public Examination: Yes |
| 13   | 13       | Council Response: No change. The designation of Special Landscape Areas was assessed using the Landmap information system, as referenced in PPW, which is the data set used in the overall assessment undertaken using the Special Landscape Area Designation Criteria included within Natural Resources Wales’ guidance. The Local Authority did refine the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. This work looked at the proposed SLAs identified by the assessment of the Landmap data and did not seek to amend this nationally consistent data set. The area Ty Mawr Lane is allocated as part of the SLA3 Wentlooge Levels and this is based on the overall value of the landscape taking into account its qualities and features which have been deemed worthy of designation. |

12/02/2014
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Document: Revised LDP, p.65
Policy: H01
Summary: Proposal of new site at Ty Mawr Lane, Marshfield - objections to Policy SP7, SP8, SP5, SP10, H1

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Policy H1 is objected to on the grounds that specific provision, either by specific site allocations or by favouring favouring extensions to the settlement boundaries for a sustainable mix of housing and/or community facilities should be identified in Marshfield.

1.1 This submission document has been prepared to accompany the required representation forms by Asbri Planning Ltd on behalf of Mr Stephen Jones. We are promoting land at Ty Mawr Lane, Marshfield as a settlement boundary change for consideration in the Local Development Plan.

1.2 The site is currently identified as being outside the village boundary for Marshfield as identified in the adopted Newport Unitary Development Plan but is bounded by existing residential development on two sides with an industrial use on the opposite side of Ty Mawr Lane. It, therefore, presents an opportunity to accommodate a sympathetic form of development which would not represent an intrusion into the countryside and which would be compatible with the surrounding area.

1.3 Whilst previous representations submitted at the Deposit Plan stage in May 2012 favoured an extension to the village boundary to accommodate 4 additional residential properties, we consider that the existing dwelling, together with out buildings, would also be suitable for an appropriate community related use, including a day nursery or surgery related use.

1.4 This Statement is structured as follows.
   • In Section Two, a description of the objection site is provided;
   • In Section Three we submit representations on the Spatial Strategy and Strategic Policies;
   • In Section Four we make representations on General Policies;
   • In Section Five we make representations on Housing Policies.
   • In Section Six we provide a Sustainability Appraisal
   • Our Conclusions are recorded in Section Seven.

2.0 DESCRIPTION OF SITE AND ITS SURROUNDINGS

2.1 The submission site is located approximately 9 kilometres to the west of Newport City Centre, to the south-east of the village of Marshfield.

2.2 The irregular-shaped site is 0.806 hectares in area. It comprises a level area of land, which includes a residential property, Greenfields Cottage, together with a garden, two paddock areas and several out-buildings. The site is enclosed by mature trees and hedgerows, with drainage ditches and is bounded by a large reen, known as Drenewydd Reen, to the east, beyond which is Ty Mawr Lane. Access to the site is provided by a single carriageway bridge across the reen. To the south recent residential development has been constructed in the manner proposed on the submission site.

2.3 To the west lies a Redrow Homes development, at Cambrian Way, which was constructed in the previous 10 years on the former Unigate Dairy site. This extends the settlement pattern beyond two parcels to the north of the submission site to the large scale agricultural buildings at Ty Mawr Farm. This effectively introduces a high density, urban form of development which includes 3-storey town houses.

2.4 Beyond Ty Mawr Lane, to the east, is a large Timber Supplies yard and associated buildings, JT Meakin Ltd, which further contributes to the urban qualities of the area. Beyond this are fields which extend to the main railway line.

3.0 THE SPATIAL STRATEGY AND STRATEGIC POLICIES

3.1 The development of the site would be compatible with Policy SP1 – Sustainability in that it would make efficient use of land which is not required for agricultural purposes and which is contained by an existing residential property which also occupies part of the site.

3.2 In terms of Policy SP3 – Flood Risk, the site lies within the TAN 15, Development Advice Maps as C1 (i.e. served by significant infrastructure, including flood defences). Nevertheless, adjacent residential development has been allowed in recent years and this is not anticipated to be a major constraint.

3.3 Policy SP12 seeks to encourage the development of Community Facilities in sustainable locations, which can include day nurseries, clinic and consulting rooms. As such this policy is generally supported. In order, however, that such facilities can serve areas which currently may be under-provided for, such as Marshfield, more flexibility is required. Minor extensions to village boundaries in
appropriate locations such as the submission site can allow provision for such uses, which may not be capable of being accommodated within the existing boundary.

3.4 The inclusion of the site not only outside the proposed settlement boundary for Marshfield but also within an area of Countryside covered by Policy SP5 – Countryside, Policy SP7 – Green Wedges and Policy SP 8 – Special Landscape Areas is inappropriate. There are consequent objections to the three policies.

3.5 The site is occupied by a single dwelling – Greenfields Cottage - with associated land and out buildings within its curtilage. It is bounded by existing residential development on two sides and there are industrial uses on the opposite side of Ty Mawr Lane (JT Meakin Ltd). As such, the inclusion of the site beyond the settlement boundaries shown is inappropriate given the site’s characteristics and its degree of containment and firm boundary to the north, in the form of a distinctive belt of vegetation.

3.6 Planning Policy Wales (PPW) – Edition 4, Feb 2011, suggests that green wedge policies and boundaries should be reviewed as part of the Development Plan review process. At paragraph 4.7.12 PPW states that:

“In defining green wedges it is important to include only land that is strictly necessary to fulfil the purposes of the policy. Factors such as openness, topography and the nature of urban edges should be taken into account. Clearly identifiable physical features should be used to establish defensible boundaries. Green wedge policies should be reviewed as part of the development plan review process.”

PPW makes it clear that only land that is strictly necessary to fulfil the purpose should be included within a green wedge and that clearly identifiable features should be used to establish ‘defensible boundaries’.

3.7 It is clear that the inclusion of the site within a proposed green wedge is contrary to the above as its development would not prejudice the gap which exists between Newport and Marshfield and existing development already extends further to the north and east. On this basis Policy SP 7 is objected to.

3.8 Whilst Policy SP8 does not necessarily preclude development from taking place, subject to the design being of a high quality, the Policy is nevertheless objected to on the grounds that the contained nature of the site separates it from wider areas of open countryside to the east and south, where the SLA designation is more appropriate in being applied to the distinctive character of the Wentlooge Levels.

3.9 Whilst it is acknowledged that the site in question would not contribute a major element of the growth proposed in the Plan Strategy, Policy SP10 – House Building Requirement is, nevertheless, objected to as the ‘brownfield’ led strategy in restricting appropriate levels of development in sustainable settlements such as Marshfield/Castleton, does not provide for a sufficient range and choice of housing. This point is expanded upon in the objections to Policy H1.

4.0 GENERAL POLICIES

4.1 Development of the site, either for 4 additional dwellings, (which could include the retention of the existing dwelling or a replacement dwelling, along with 4 others), or alternatively, a community related use such as a day nursery, or surgery, would be compatible with Policies, GP1 – General Development Principles – Climate Change; GP2 – General Development Principles – General Amenity; GP3 – General Development Principles – Service Infrastructure; GP4 – General Development Principles – Highways and Accessibility; GP 5 - General Development Principles – Natural Environment; and GP6 – General Development Principles – Design.

4.2 Residential development on the site would be fully compatible with adjacent residential uses as it would reflect the existing pattern of development on the adjacent site to the south, which also comprises of 5 dwellings served by a bridge over Drenewydd Reen. Alternatively a community related use would meet a local demand in the village, which is generally under-provided for given the population base. As stated in the previous section the tightly drawn development boundary around Marshfield will restrict future community provision. A community use of the type envisaged would also bring forward local employment opportunities.

4.3 The site plan attached in Appendix 1 highlights the degree to which the site relates to the development pattern of the area rather than the wider countryside to the north and east. It is accepted that a high quality form of development would be necessary which would complement the edge of village location.

4.4 In sustainability terms the site is close to facilities in the village, being some 500 metres distant from the village shop/post office at Marshfield Road, and 750 metres from a public house and community and recreation facilities along St Mellons Road. Marshfield Junior and Infants School is some 1.5 kilometres to the west. Bus services operating nearby include the 31A/31C service Newport-Castleton-Marshfield- St Brides, which has 4 forward journeys and 3 returns, Monday to Friday, and 3 forward, 2 reverse on Saturdays. Service 30, Newport to Cardiff, along the A48 operates on a 40 minute frequency Monday to Saturday. Ty Mawr Lane is part of a long distance footpath/cycle route between Newport and Cardiff and the level nature of the area renders it ideal for cycling journeys.
4.5 With regard to Policy GP5, an Ecological Assessment, carried out by David Clements Ecology Ltd, was carried out in July 2010 and is included as supporting evidence in Appendix 2. In assessing the potential impact of development on the designated Site of Special Scientific Interest (SSSI) which affects the majority of the site, it is acknowledged that areas of grassland habitat would be lost. However, the grasslands on the site are not of intrinsically high ecological interest. The grassland habitats within the Gwent Levels SSSI were not a significant factor in its designation. Consequently the loss of habitat is not considered to be greater than local significance for wildlife. Similarly the trees, scrub, bramble and landscape plantings on the site are considered to be of local value with no noteworthy plant species recorded.

4.6 The presence of the Drenewydd Reen, however, is significant in ecological terms as it is considered to be of national value for wildlife, supporting uncommon plant species and invertebrates. A buffer area will be required between the reen and any new development with associated measures, including the avoidance of lighting. During the construction phase, best practice mitigation will also be required in order to avoid sedimentation or pollution in the reen.

4.7 The Ecological Assessment includes a list of recommendations and other study work which would be necessary to inform a future planning application.

5.0 HOUSING POLICIES

5.1 Newport has been successful in recent years in securing development on sites along the River Usk, Old Town Dock, Mon Bank Sidings and other sustainable locations where existing and proposed forms of development are contributing positively to enhancing the image of the new City. Selective releases will be required, however, in order to maximise housing land opportunities. These will need to include relatively small sites where appropriate forms of development can be accommodated which reflect the existing settlement pattern of the surrounding villages and where development can be accommodated which would not represent a major intrusion into the surrounding countryside.

5.2 On the edge of the City and its 'satellite' settlements such as Marshfield/Castleton, in order to maintain a range and choice of appropriate housing land opportunities, there will be a continuing need to include relatively small sites where low density forms of development can be accommodated which reflect the existing settlement pattern of the area and where development would not represent an intrusion into the surrounding countryside.

5.3 Whilst Marshfield is a village outside the main urban area of Newport, there is no specific reference in the Plan to the larger settlements outside the urban area which have a range of services and can be regarded as sustainable settlements in their own right.

5.4 In the above context, Marshfield, as part of the linked settlement with Castleton, merits such consideration. The Ward has a population of over 4,000, approximately 3,000 of which live in the two villages.

5.5 ‘Cluster’ settlements which combined have a sustainable range of facilities are regarded as ‘sustainable settlements’ in various Local Development Plans in Wales and provision for appropriate growth is made. For this reason Policy H1 is objected to on the grounds that specific provision, either by specific site allocations or by favouring amendments to the settlement boundaries for a sustainable mix of housing should be identified in Marshfield/Castleton.

5.6 In the context of the above, supporting paragraph 5.9 refers to the likely contribution from small sites, whilst 5.10 refers to an allowance of 50 units a year which are estimated to come forward as part of a ‘windfall allowance’ for infill and windfall sites. With urban and settlement boundaries remaining as they were from the Unitary Development Plan, such figures are unlikely to be realised given the number of windfall sites already associated with large brownfield releases.

6.0 SUSTAINABILITY APPRAISAL

6.1 Whilst the number of units proposed on the site (5) is lower than the 10 units or above normally associated with a specific housing land allocation, a Self-Assessment of the Alternative Site has been undertaken and is included in Appendix 3. It is noted that the Newport Site Assessment Methodology led to the agglomeration of a number of candidate sites forming the 46 strategic sites. A candidate site was not originally submitted in respect of the submission site. However, it falls within the overall Marshfield East agglomeration.

6.2 The Assessment attached in Appendix 3 provides a Sustainability Appraisal of the proposed site, using the Local Planning Authority's criteria which has been applied for assessing the significance of effects as included in the Deposit LDP Sustainability Appraisal/Strategic Environmental Assessment Report. The Assessment Scale from the Report is reproduced below and the site assessed against this criteria.
6.3 The assessment undertaken compares the ‘Self-Assessment’ with the assessment of Marshfield East, carried out by Atkins on behalf of the Council. In assessing a wider area for development to the east of Marshfield the assessment identifies 12 areas where the development would be in conformity with the objectives (Green), and 17 which would be in conflict (Red).

6.4 By contrast, in assessing the submission site in isolation, only 3, red, negative factors are attributed (in relation to the SSSI, watercourse and distance from passenger rail facilities). A total of 28 green, positive ‘scores’ however were recorded.

6.5 It is clear, therefore, that development of the site would meet a far larger proportion of the objectives in achieving greater sustainability, whilst there are only 3 negative factors likely to detract from these objectives. As we have seen from the Ecological Assessment the presence of the SSSI and sensitive watercourse can be addressed by appropriate mitigation which would neutralise potential negative impacts. For the above reasons development of the site should be allowed for in the Local Development Plan.

7.0 CONCLUSIONS

7.1 This statement is submitted as a response to the Newport Deposit Local Development Plan (LDP) on behalf of Mr Stephen Jones regarding land at Ty Mawr Lane, Marshfield. The site was not previously submitted as a candidate site, but if the village boundary were extended would be suitable for either residential development (a small scale development of 4 to 5 dwellings which reflects the adjacent form of development to the south, or alternatively community related uses (in the form of a day nursery or surgery).

7.2 Objections are submitted to the following Plan Policies:-

• Strategic Policies SP5 – Countryside, Policy SP7 – Green Wedges and Policy SP 8 – Special Landscape Areas are objected to on the grounds that the site is identified outside the proposed settlement boundary for Marshfield within these designations;

• Policy SP10 – House Building Requirement, is objected to as the ‘brownfield’ led strategy restricts appropriate levels of development in sustainable settlements such as Marshfield/Castleton

• Following from the above, Policy H1 is objected to on the grounds that appropriate allocations and/or revisions to settlement boundaries should be made in order to maintain a range and choice of appropriate housing land opportunities in larger villages outside the urban area which have a range of services and can be regarded as sustainable settlements in their own right, including Marshfield/Castleton.

The Proposals Map is also objected to on the above basis.

7.3 By not maximising opportunities for residential or community uses and allowing for flexibility which otherwise would be presented by the inclusion of the site within the settlement boundary, the Plan fails the Tests of Soundness. CE2, in not having considered relevant alternatives, and CE4 in not being reasonably flexible enough to deal with changing circumstances.

7.4 An Assessment has been prepared under the Council’s Sustainability Appraisal/Strategic Environmental Assessment objectives which show that in sustainability terms the development of the site would be acceptable. Indeed, development would aim to be compatible with general development policies in the Plan.

7.5 In light of the above, it is recommended that Newport City Council should include the land shown edged red on the attached plan, as an extension to the settlement boundary for Marshfield in future Focused Changes to the Plan.

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12/02/2014
Council Response

The Council response to the representation concerning policy SP8 can be viewed against representation 3074.L2.

Planning Policy Wales sets out the overarching requirement for development to be placed on brownfield sites in preference to greenfield sites. The plan allocates 82% housing units on brownfield sites with the remaining 18% of units on greenfield sites (these calculations excludes the completions, windfall and small sites supply figures). The LDP is therefore compliant with Planning Policy Wales in terms that it has followed the search sequence criteria starting with the re-use of previously developed land and buildings within settlements which are located in areas accessible to jobs and services, where there is existing infrastructure and the scope to build sustainable communities.

Extensions to more isolated settlements such as the village areas within Newport have also been investigated. The preferred strategy set out that well evidenced sustainable village expansions would be considered, however none were considered appropriate. The plan does include a housing exception policy for affordable housing development within the countryside on the edge of existing settlements whereby providing the flexibility for the provision of a local housing requirement. Those applications which were considered as part of this review of village boundaries and potential extension plots have been assessed individually and the result of this assessment can be viewed in the Alternative Sites Assessment Report 2013 and the Settlement boundary methodology background paper 2013.

Sites beyond the settlement boundary

As part of the development of the LDP sites were suggested for inclusion across Newport. Those applications have been assessed individually and the result of this assessment can be viewed in the Alternative Sites Assessment Report 2013. In addition to this work a review of boundaries, including Langstone, was undertaken the full details of which can be viewed in the Settlement boundary methodology background paper 2013.

Range and Choice

The supply of housing is considered to provide for a clear range and choice of housing which is a clear concern for many representors. The housing sites within the Plan are located across the City, with a clear focus on regeneration in the east as per the established strategy. The Plan provides a supply of affordable units for a mixture of needs as well as providing a mix of family homes and inner city living to cater for the broad housing market. The opportunity to provide homes in more rural locations has been investigated and there was no clear evidence to justify expansion to existing settlements. No evidence has also been provided to support the representation that a site is required to bridge the division between Newport and Monmouth. Assessments of housing need take into account cross boundary issues. The Plan therefore has provided the opportunity for exception sites where such justification can be produced.

It is considered that the plan provides a more than adequate supply of housing, both market and affordable, which is both deliverable and viable.

The site at Ty Mawr Lane is located outside the settlement boundary within Countryside, Green Wedge and the Special Landscape Area at the Wentloog Levels. The site is considered important in terms of ecology and is located within a SSSI.

The plan seeks to promote the reuse of Brownfield sites in preference to extensive use of Greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities.

The forecast housing need has been assessed in the context of population and employment projections and current market realities. The plan allocates sufficient land to meet this requirement. Additionally, the release of the representation site for housing would be contrary to the Council’s strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

The site has the potential to have an adverse affect on a nationally important ecological designation and is within an area of flood risk. It has important landscape features that coincide with the allocation to protect it for continued use as Countryside and resist expansion to protect a distinct village area. The site is located immediately adjacent to the village boundary but is predominantly greenfield. The site does not reflect the underlying brownfield strategy for the plan and it is therefore recommended that this site is not included in the Local Development Plan for residential purposes or for community facilities.
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Document: Revised LDP, p. 24
Policy: SP10
Summary: Proposal of new site at Ty Mawr Lane, Marshfield - objections to Policy SP7, SP8, SP5, SP10, H1

10  Soundness Test
CE2, CE4

11  Representation
Policy SP1 - House Building Requirement is objected to as the 'brownfield' led strategy in restricting appropriate levels of development in sustainable settlements such as Marshfield/Castleton, does not provide for a sufficient range and choice of housing.

See attached submission document and sustainability appraisal.

12  Speaking at Public Examination
Yes

2  Soundness of LDP
No
The Green Belt is set out to ensure that there is no coalition between Cardiff and Newport and as recognised within the representation this designation goes beyond a plan period. Therefore it is accepted that the Green Belt boundary is an accepted constraint. It is considered that the LDP provides a balanced housing supply, concentrating on the continued sustainable use of previously developed land. Therefore the need to encroach into the Green Belt is not considered necessary.

Over Reliance on Brownfield Sites
Planning Policy Wales sets out the overarching requirement for development to be placed on brownfield sites in preference to greenfield sites. The plan allocates 82% housing units on brownfield sites with the remaining 18% of units on greenfield sites (these calculations excludes the completions, windfall and small sites supply figures). The LDP is therefore compliant with Planning Policy Wales in terms that it has followed the search sequence criteria starting with the re-use of previously developed land and buildings within settlements which are located in areas accessible to jobs and services, where there is existing infrastructure and the scope to build sustainable communities.

Range and Choice
The supply of housing is considered to provide for a clear range and choice of housing which is a clear concern for many representors. The housing sites within the Plan are located across the City, with a clear focus on regeneration in the east as per the established strategy. The Plan provides a supply of affordable units for a mixture of needs as well as providing a mix of family homes and inner city living to cater for the broad housing market. The opportunity to provide homes in more rural locations has been investigated and there was no clear evidence to justify expansion to existing settlements. No evidence has also been provided to support the representation that a site is required to bridge the division between Newport and Monmouth. Assessments of housing need take into account cross boundary issues. The Plan therefore has provided the opportunity for exception sites where such justification can be produced.

It is considered that the plan provides a more than adequate supply of housing, both market and affordable, which is both deliverable and viable.

The site has the potential to have an adverse affect on a nationally important ecological designation and is within an area of flood risk. It has important landscape features that coincide with the allocation to protect it for continued use as Countryside and resist expansion to protect a distinct village area. The site is located immediately adjacent to the village boundary but is predominantly greenfield. The site does not reflect the underlying brownfield strategy for the plan and it is therefore recommended that this site is not included in the Local Development Plan for residential purposes.
## Representation Details

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SA/SEA submitted

**Document:** Revised LDP, p.21  
**Policy:** SP05  
**Summary:** Proposal of new site at Ty Mawr Lane, Marshfield - objections to Policy SP7, SP8, SP5, SP10, H1

### Item Question

| 10 | Soundness Test | No |
| 11 | Representation  |

The site is occupied by a single dwelling - Greenfields Cottage - with associated land and out buildings within its curtilage. It is bounded by existing residential development on two sides and there are industrial uses on the opposite side of Ty Mawr Lane (JT Meakin Ltd). As such, the inclusion of the site beyond the settlement boundaries shown is inappropriate given the site's characteristics and its degree of containment and firm boundary to the north, in the form of a distinctive belt of vegetation.

Please see hyperlink of attached submission document and sustainability appraisal.

| 12 | Speaking at Public Examination | Yes |

### Item Question

| 2  | Soundness of LDP |

### Item Question

**Council Responses**
No change. The site is located outside the settlement boundary within Countryside, Green Wedge and the Special Landscape Area of the Wentlooge Levels. The site is considered important in terms of ecology and is located within a SSSI.

The plan seeks to promote the reuse of Brownfield sites in preference to extensive use of Greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities. The forecast housing need has been assessed in the context of population and employment projections and current market realities. The plan allocates sufficient land to meet this requirement. Additional housing allocations in a rural location cannot therefore be justified. Furthermore, the release of the representation site for housing would be contrary to the Council’s strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

A background paper ‘Delivery and Implementation’ has been produced to expand on the information supplied in Chapter 13 of the Deposit LDP. This sets out the proposed phasing, constraints and infrastructure requirements for each allocation. The Delivery of each site is considered here, setting out the justification for its continuation in the plan based on evidence from developers and landowners. Some of the large brownfield sites allocated within the previous Unitary Development Plan have started construction e.g. Glan Llyn with 4000 homes and employment uses on the site. The impact on development by the economic recession is to be considered and the plan takes a long term view across the entire plan period.

The LDP sets out a strategy for growth which allocates an adequate supply of land for residential and employment uses. The supply of this land is not concentrated in one area but across the City. It is recognised that growth in the east is significant but the west has not been overlooked with large brownfield sites allocated at Novelis, former Whitehead Works and Monmouthshire Bank Sidings. The review of village boundaries has clearly considered the need for expansion in these areas and following their assessment boundaries have been tightened and allocations resisted due to the unsuitability of sites proposed in these unsustainable locations.

Development of the site has the potential to have an adverse effect on a nationally important ecological designation and is within an area of flood risk. It has important landscape features that coincide with the allocation to protect it for continued use as Countryside and resist expansion to protect a distinct village area. The site is located immediately adjacent to the village boundary but is predominantly Greenfield. The site does not reflect the underlying brownfield strategy for the plan and it is therefore recommended that this site is not included in the Local Development Plan for residential purposes. The countryside allocation should therefore remain.
### Representation Details

**Representor**: Johnsey Estates Ltd  
**Agent**: RPS Group PLC  
**Accession No**: 01/08/2013  
**Date Lodged**: EOIIM  
**Late?**:  
**Source**: Revised LDP, p. 95  
**Policy**: R06  
**Summary**: Newport Retail Park should be included in the list of District Centre in Policy R6

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Additional material submitted - Please click here

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**Soundness of LDP**: No

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**Tick-box reply**

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12/02/2014
Boundary
The preparation of the Local Development Plan (LDP) is an appropriate time to review boundaries defined in the Plan. Accordingly a review of all district centres allocated in the Adopted Unitary Development Plan has been undertaken for the preparation of the LDP. The definition of a boundary for Newport Retail Park District Centre within the LDP is of particular importance as the UDP does not define a boundary, with the East Newport Development Framework Supplementary Planning Guidance and appeals decisions forming the basis of a boundary. The defined boundary in the Revised Deposit LDP seeks to reasonably provide Newport Retail Park District Centre with a defensible boundary for Development Management purposes and give certainty to future investors, developers and officers in terms of defining the retail centre on a clear and adopted Plan, confirming its position in the retail hierarchy for the application of the sequential test and implementation of retail planning policy, and reflecting its role as a district centre to serve the eastern catchment area.

The exclusion of the part of the park next to the EEA is also considered appropriate. The layout and function of the area between the defined centre in the LDP and the intervening boundary with the Eastern Expansion Area is different to the proposed defined centre area. It is separated from it by the estate access road and retail units such as Marks and Spencer's back onto the area with the opportunities for full integration limited. The area functions predominantly as a car sales and leisure area dominated by 3 car sales areas, the large vacant Megabowl unit and a large cinema with smaller scale A3 users scattered around the southern end. Matalan occupies a remote position in the northern portion. Whilst it is acknowledged that the area is an established commercial and leisure area with a number of extant permissions, notably for retail uses, there are no existing direct connections between this area and the Eastern Expansion Area and uncertainty in terms of whether these can ever be achieved in the longer term. The existing pedestrian route via the Queensway roadside pathway offers the existing and most realistic pedestrian link from the EEA in the long term. There is a desire to secure the infrastructure to improve access from this route into the district centre and within the district centre itself, and to facilitate a pedestrian link within this area to meet the intervening boundary. The most obvious place to locate this is at the northern end of the Megabowl unit. This was secured as part of an extant but currently unimplemented permission to convert the unit to a supermarket. However, the ability to secure a continuation of this link on the EEA side of the boundary is also uncertain. Therefore, at this time a pedestrian link between the district centre and the residential development within the EEA, over and above the existing roadside pathway, is an aspiration for the Council but cannot currently be guaranteed.

The Council is of the view that the inclusion of this area within the district centre boundary is not appropriate. It is for the LPA to consider and review its district centre boundaries to ensure that they reflect the centre's future role in terms of current retail planning policy and the retail hierarchy. The Council has included what it feels currently reflects a reasonable and appropriate district centre boundary having regard to the centre's size, layout, location, range of uses, catchment, and current and likely function over the Plan period. This has regard to the Newport Retail Capacity Study undertaken on the Council's behalf by Colliers International, the city centre first approach in retail planning policy and the form and function of Newport's City Centre. A cumbersome and unduly large district centre against the backdrop of current retail planning policy poses a threat to the vitality and viability of the city centre in our view and is unlike any other district centre in Newport in this respect. The sheer scale and ground area of the district centre as it currently stands (i.e. including the area in between) gives opportunities for new retail development pressure and curtails development management implementation of retail planning policy controls and raises uncertainty amongst potential developers in sequentially preferable centres regarding the role of the district centre.

Issue – Inspector’s Report
It is acknowledged that a similar set of arguments were discussed at the UDP Inquiry and the Inspector recommended the Plan should not include any caveats for Newport Retail Park District Centre. However, the preparation of the LDP provides an opportunity to review policies and assess whether they are achieving their objectives. For this reason the policy approach taken towards NRPDC has been reviewed alongside the evidence and policy recommendations set out in the Collier's Retail Study and Capacity Assessment (July 2010). A new policy approach in the Local Development Plan is therefore considered acceptable and justified.

Separate Policy Approach
A separate policy approach to NRP is considered justified and in accordance with PPW (5th ed, Nov 2012) which notes that development plans should establish existing hierarchy of centres and be clear about their future roles (10.2.1). Within this context Policy R7 has been prepared as the Council considers Newport Retail Park District Centre to be different to its other district centres and to have greater potential to have an impact on the City Centre. This is supported by the findings of the Colliers Retail Study and Assessment (July 2010). The Study notes that 55% of Newport’s occupied retail floorspace in district centres is at Newport Retail Park District Centre. The Centre’s potential to compete with the City Centre is also acknowledged at paragraph 8.25. Notwithstanding, the district centre allocation, the Collier’s Study recommends a number of policy restrictions that should be considered for Newport Retail Park District Centre (para 8.30 – 8.39). Policy R7 seeks to incorporate these recommendations in a way that allows retail development that is appropriate in scale to a district centre and does not impact on the vitality and viability of the City Centre.

Policy Title
For consistency and clarification purposes a revision to the Policy title is considered acceptable. The title will now read “Retail Proposals in Newport Retail Park District Centre”.

Opening part of the Policy
Past experience of retail applications submitted in relation to Newport Retail Park District Centre, is that applicants submit evidence defining it as a town centre for the purposes of the application of the
sequential test. Defining NRP as a District Centre within the policy clearly establishes its position in the retail hierarchy and sets out the approach the Council will take in assessing proposals that come forward.

The justification for allocating Newport Retail Park as a District Centre was to serve the Eastern Expansion Area, without this purpose it would have remained an out-of-centre retail park. Policy R7 reflects this in the opening part of the policy to clearly set out its primary function. Its wider role of serving the surrounding settlements will be reflected in paragraph 8.22.

Policy R7 prejudges applications for the Plan period
The Colliers Retail Study and Capacity Assessment (July 2010) and follow up letter dated February 2013 have formed the evidence and background work to the preparation of Policy R7. The Colliers Retail Study covers the plan period up to 2026 and has made policy recommendations for an appropriate LDP response for this period.

Criterion (i) Extant consents remain unaffected by the proposed policy. However, should they lapse new applications would be subject to the Local Development Plan policies once adopted. Criterion (i) is derived from the Colliers Retail Study recommendations that notes “further expansion of convenience retailing would change the function and character of the centre, expanding it beyond what is appropriate in a district centre and thereby changing its position in the hierarchy (para 8.37). This point is expanded upon in the Collier’s Supplement (February 2013) which seeks to ensure convenience retailing proposals that come forward are of an appropriate scale to a district centre. The threshold of 929sq m retail sales floorspace is considered appropriate as the Collier’s Supplement states, based upon the current actual retail sales floorspace of operators, it would permit smaller stores serving a local function, such as convenience stores, discounters and small supermarkets, but would prevent the addition of new superstores which are likely to draw trade from a wider area.

Criterion (ii) The January 2013 date is a point in time to provide a basis to measure any increase/decrease in net retail floorspace in the district centre. The thought process to this criterion is set out in Collier’s Supplement (February 2013) which notes the approach would be to make larger scale redevelopment in the centre or its extension, subject to the same tests as out of centre development – justified on the basis of the unusual justification for the district centre’s designation……this approach would also enable the sequential approach to be applied in a controlled manner. The net increase figure is an absolute figure based on the net floorspace as measured at January 2013. It is felt this criterion, allows any potential expansion to be monitored and implemented at a scale appropriate to the district centre’s position in the retail hierarchy. As noted above the justification behind allocating Newport Retail Park as a District Centre was to serve the Eastern Expansion area, this principal function has not changed, although paragraph 8.22 has been updated to reflect its wider role.

Criterion (iii) Colliers Retail Study (July 2010) at paragraph 8.35 notes there is potential for Newport Retail Park District Centre to change the nature of the goods it sells and thereby to compete directly with the City Centre for the sale of non-bulky comparison goods. Criterion iii is therefore considered to be justified in the interest of protecting the vitality and viability of the City Centre.

Criterion (iv) It is noted that Policy R8 also covers non retail uses in District Centres, however criterion iv) of Policy R7 seeks to ensure the proposed use is of a scale appropriate for a district centre and Newport Retail Park’s primary purpose of serving the Eastern Expansion Area.

Criterion (v) The suggested wording is not considered to change the purpose of the criterion, therefore no change is proposed to the Plan.

Definition of Retail Floorspace
A definition of retail sales floorspace has been added to the Plan to aid measuring it when considering applications and set out clearly the Council’s interpretation of retail sales floorspace. It has been included within the policy text to aid the reader. However, it is accepted that it is a definition rather than policy. The definition will be retained, but added to the supporting text.

Paragraph 8.21 – The evidence base to Policy R7 is set out in the Collier’s Retail Study, which is referenced throughout the supporting text. The following sentence will be added to paragraph 8.21 to reflect the positive contribution Newport Retail Park District Centre has made in providing jobs, services and retail provision for the Eastern Expansion Area:

“Newport Retail Park District Centre has successfully developed into a centre which provides shops, jobs and helps retain retail expenditure within Newport. However ……………”

Paragraph 8.24 – 8.28
As no changes are proposed to criteria (i) and (ii) of Policy R7, paragraphs 8.24 – 8.28 remain relevant.
Paragraph 8.30
Paragraph remains relevant as it supplements criterion iv).
### Representation Details

**Document:** Revised LDP, p.96  
**Policy:** R07  
**Summary:** R7 is muddled and unsubstantiated and should be deleted or at the very least subject to major amendment

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- **Muddled and unsubstantiated policy which should be deleted or at the very least subject to major amendment.**

- **Our clients wish to speak in relation to all of the points raised in relation to policies R6, R& and inset 25.**

- **The revised Deposit LDP policies on retailing are considered to be unsound and require to be debated.**

### Soundness Test

- **C2, CE1, CE2 and CE4**

## Council Responses

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- **No**
The preparation of the Local Development Plan (LDP) is an appropriate time to review boundaries defined in the Plan. Accordingly a review of all district centres allocated in the Adopted Unitary Development Plan has been undertaken for the preparation of the LDP. The definition of a boundary for Newport Retail Park District Centre within the LDP is of particular importance as the UDP does not define a boundary, with the East Newport Development Framework Supplementary Planning Guidance and appeals decisions forming the basis of a boundary. The defined boundary in the Revised Deposit UDP seeks to reasonably provide Newport Retail Park District Centre with a defensible boundary for Development Management purposes and give certainty to future investors, developers and officers in terms of defining the retail centre on a clear and adopted LDP, confirming its position in the retail hierarchy for the application of the sequential test and implementation of retail planning policy, and reflecting its role as a district centre to serve the eastern catchment area.

The exclusion of the part of the park next to the EEA is also considered appropriate. The layout and function of the area between the defined centre in the LDP and the intervening boundary with the Eastern Expansion Area is different to the proposed defined centre area. It is separated from it by the estate access road and retail units such as Marks and Spencers back onto the area with the opportunities for full integration limited. The area functions predominantly as a car sales and leisure area dominated by 3 car sales areas, the large vacant Megabowl unit and a large cinema with smaller scale A3 users scattered around the southern end. Matalan occupies a remote position in the northern portion. Whilst it is acknowledged that the area is an established commercial and leisure area with a number of extant permissions, notably for retail uses, there are no existing direct connections between this area and the Eastern Expansion Area and uncertainty in terms of whether these can ever be achieved in the longer term. The existing pedestrian route via the Queensway roadside pathway offers the existing and most realistic pedestrian link from the EEA in the long term. There is a desire to secure the infrastructure to improve access from this route into the district centre and within the district centre itself, and to facilitate a pedestrian link within this area to meet the intervening boundary. The most obvious place to locate this is at the northern end of the Megabowl unit. This was secured as part of an extant but currently unimplemented permission to convert the unit to a supermarket. However, the ability to secure a continuation of this link on the EEA side of the boundary is also uncertain. Therefore, at this time a pedestrian link between the district centre and the residential development within the EEA, over and above the existing roadside pathway, is an aspiration for the Council but cannot currently be guaranteed.

The Council is of the view that the inclusion of this area within the district centre boundary is not appropriate. It is for the LPA to consider and review its district centre boundaries to ensure that they reflect the centre’s future role in terms of current retail planning policy and the retail hierarchy. The Council has included what it feels currently reflects a reasonable and appropriate district centre boundary having regard to the centre’s size, layout, location, range of uses, catchment, and current and likely function over the Plan period. This has regard to the Newport Retail Capacity Study undertaken on the Council’s behalf by Colliers International, the city centre first approach in retail planning policy and the form and function of Newport’s City Centre. A cumbersome and unduly large district centre against the backdrop of current retail planning policy poses a threat to the vitality and viability of the city centre in our view and is unlike any other district centre in Newport in this respect. The sheer scale and ground area of the district centre as it currently stands (i.e. including the area in between) gives opportunities for new retail development pressure and curtails development management implementation of retail planning policy controls and raises uncertainty amongst potential developers in sequentially preferable centres regarding the role of the district centre. Experience over recent years shows that Newport Retail Park, by exceeding its role as a District Centre, has had a very damaging effect on the City Centre.

Issue – Inspector’s Report

It is acknowledged that a similar set of arguments were discussed at the UDP Inquiry and the Inspector recommended the Plan should not include any caveats for Newport Retail Park District Centre. However, the preparation of the LDP provides an opportunity to review policies and assess whether they are achieving their objectives. For this reason the policy approach taken towards NRPDC has been reviewed alongside the evidence and policy recommendations set out in the Collier’s Retail Study and Capacity Assessment (July 2010). A new policy approach in the Local Development Plan is therefore considered acceptable and justified. The concerns raised by the Council in the UDP inquiry have been realised, and Newport Retail Park has significantly adversely affected the vitality and visibility of the City Centre. In order to maintain the primacy of the City Centre, steps must be taken to limit the expansion of Newport Retail Park so that it functions as a District Centre.

Separate Policy Approach

A separate policy approach to NRP is considered justified and in accordance with PPW (5th ed, Nov 2012) which notes that development plans should establish existing hierarchy of centres and be clear about their future roles (10.2.1). Within this context Policy R7 has been prepared as the Council considers Newport Retail Park District Centre to be different to its other district centres and to have greater potential to have an impact on the City Centre. This is supported by the findings of the Colliers Retail Study and Assessment (July 2010). The Study notes that 55% of Newport’s occupied retail floorspace in district centres is at Newport Retail Park District Centre. The Centre’s potential to compete with the City Centre is also acknowledged at paragraph 8.25. Notwithstanding, the district centre allocation, the Collier’s Study recommends a number of policy restrictions that should be considered for Newport Retail Park District Centre (para 8.30 – 8.39). Policy R7 seeks to incorporate these recommendations in a way that allows retail development that is appropriate in scale to a district centre and does not impact on the vitality and viability of the City Centre.

Policy Title

For consistency and clarification purposes a revision to the Policy title is considered acceptable. The title will now read “Retail Proposals in Newport Retail Park District Centre”.
Opening part of the Policy

Past experience of retail applications submitted in relation to Newport Retail Park District Centre, is that applicants submit evidence defining it as a town centre for the purposes of the application of the sequential test. Defining NRP as a District Centre within the policy clearly establishes its position in the retail hierarchy and sets out the approach the Council will take in assessing proposals that come forward.

The justification for allocating Newport Retail Park as a District Centre was to serve the Eastern Expansion Area, without this purpose it would have remained an out-of-centre retail park. Policy R7 reflects this in the opening part of the policy to clearly set out its primary function. Its wider role of serving the surrounding settlements will be reflected in paragraph 8.22.

Policy R7 prejudges applications for the Plan period

The Colliers Retail Study and Capacity Assessment (July 2010) and follow up letter dated February 2013 have formed the evidence and background work to the preparation of Policy R7. The Colliers Retail Study covers the plan period up to 2026 and has made policy recommendations for an appropriate LDP response for this period.

Criterion (i)

Extant consents remain unaffected by the proposed policy. However, should they lapse new applications would be subject to the Local Development Plan policies once adopted. Criterion (i) is derived from the Colliers Retail Study recommendations that notes “further expansion of convenience retailing would change the function and character of the centre, expanding it beyond what is appropriate in a district centre and thereby changing its position in the hierarchy (para 8.37). This point is expanded upon in the Collier’s Supplement (February 2013) which seeks to ensure convenience retailing proposals that come forward are of an appropriate scale to a district centre. The threshold of 929sq m retail sales floorspace is considered appropriate as the Collier’s Supplement states, based upon the current actual retail sales floorspace of operators, it would permit smaller stores serving a local function, such as convenience stores, discounters and small supermarkets, but would prevent the addition of new superstores which are likely to draw trade from a wider area.

Criterion (ii)

The January 2013 date is a point in time to provide a basis to measure any increase/decrease in net retail floorspace in the district centre. The thought process to this criterion is set out in Collier’s Supplement (February 2013) which notes the approach would be to make larger scale redevelopment in the centre or its extension, subject to the same tests as out of centre development – justified on the basis of the unusual justification for the district centre’s designation. This approach would also enable the sequential approach to be applied in a controlled manner.

The net increase figure is an absolute figure based on the net floorspace as measured at January 2013. It is felt this criterion, allows any potential expansion to be monitored and implemented at a scale appropriate to the district centre’s position in the retail hierarchy. As noted above the justification behind allocating Newport Retail Park as a District Centre was to serve the Eastern Expansion area, this principal function has not changed, although paragraph 8.22 has been updated to reflect its wider role.

Criterion (iii)

Colliers Retail Study (July 2010) at paragraph 8.35 notes there is potential for Newport Retail Park District Centre to change the nature of the goods it sells and thereby to compete directly with the City Centre for the sale of non-bulky comparison goods. Criterion iii is therefore considered to be justified in the interest of protecting the vitality and viability of the City Centre.

Criterion (iv)

It is noted that Policy R8 also covers non retail uses in District Centres, however criterion iv) of Policy R7 seeks to ensure the proposed use is of a scale appropriate for a district centre and Newport Retail Park’s primary purpose of serving the Eastern Expansion Area.

Criterion (v)

The suggested wording is not considered to change the purpose of the criterion, therefore no change is proposed to the Plan.

Definition of Retail Floorspace

A definition of retail sales floorspace has been added to the Plan to aid measuring it when considering applications and set out clearly the Council’s interpretation of retail sales floorspace. It has been included within the policy text to aid the reader. However, it is accepted that it is a definition rather than policy. The definition will be retained, but added to the supporting text.

Paragraph 8.21 – The evidence base to Policy R7 is set out in the Collier’s Retail Study, which is referenced throughout the supporting text. The following sentence will be added to paragraph 8.21 to reflect the positive contribution Newport Retail Park District Centre has made in providing jobs, services and retail provision for the Eastern Expansion Area:

“Newport Retail Park District Centre has successfully developed into a centre which provides shops, jobs and helps retain retail expenditure within Newport. However .............”
Paragraph 8.24 – 8.28
As no changes are proposed to criteria (i) and (ii) of Policy R7, paragraphs 8.24 – 8.28 remain relevant.

Paragraph 8.30
Paragraph remains relevant as it supplements criterion iv).

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### Representation Details

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**Document:** Revised LDP, p.95

**Policy:** R06

**Summary:** Inset Plan 25 should be revised to include more land within the Newport Retail Plan District Boundary (see attached plan)

**Item Question** | **Representation Text**
---|---
3 | New Policy
4 | A new paragraph or new text
11 | Representation
12 | Speaking at Public Examination

Inset Plan 25 is wholly incorrect in the RDLP and does not show Newport Retail Park District Centre at all.

Our clients wish to speak in relation to all of the points raised in relation to policies R6, R7 and inset 25.

The revised Deposit LDP policies on retailing are considered to be unsound and require to be debated.

**Item Question** | **Tick-box reply**
---|---
2 | Soundness of LDP

No

**Item Question** | **Council Responses**
---|---
13 | Council Response

See 3157.L1 for response.
Representation Details

Document: Revised LDP, p.95
Policy: R6
Summary: Amendments/Objections to policies R6, R7 and SP20

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Soundness Test

The LDP is considered unsound under the following ‘tests of soundness’:

i) Consistency Tests
   • C2: The plan is in conflict with Planning Policy Wales (PPW) in including draft policies which actively seek to inappropriately constrain the potential growth of a District Centre and which are therefore likely to undermine the functioning and health of the Centre.

   ii) Coherence and Effectiveness Tests
      • CE1: The RDLDP does not set out a coherent retail strategy and draft Policies SP20, R6 and R7 do not logically flow from each other. The strategy fails to recognise the dual role of NRPDC which retains expenditure and jobs in Newport.
      • CE2: The retail strategy, policies and allocations are not founded on a robust or credible evidence base.
      • CE4: Policy R7 has insufficient flexibility to respond to changing circumstances.
This representation concerns draft policies R6 and R7 and the LDP Evidence Base. The Revised Deposit LDP (RDLDP) seeks to impose a special policy for NRPDC which would stifle growth. These policies are unnecessary and are not justified under national planning guidance or by the LDP Evidence Base.

The LDP is considered unsound under the following ‘tests of soundness’:

i) Consistency Tests
   • C2: The plan is in conflict with Planning Policy Wales (PPW) in including draft policies which actively seek to inappropriately constrain the potential growth of a District Centre and which are therefore likely to undermine the functioning and health of the Centre.

ii) Coherence and Effectiveness Tests
   • CE1: The RDLDP does not set out a coherent retail strategy and draft Policies SP20, R6 and R7 do not logically flow from each other. The strategy fails to recognise the dual role of NRPDC which retains expenditure and jobs in Newport.
   • CE2: The retail strategy, policies and allocations are not founded on a robust or credible evidence base.
   • CE4: Policy R7 has insufficient flexibility to respond to changing circumstances.

If Policy R7 is to be retained, it should read as follows:

R7 Retail Proposals in Newport Retail Park District Centre

The Newport Retail Park District Centre is defined in Inset Plan 25. Improved Shopping facilities will be favoured providing that:

i) The proposal is of a scale appropriate to the District Centre;
ii) The proposal would not have an adverse impact on the vitality and viability of the city centre;
iii) The siting and design of the proposals make appropriate provision for links to the adjoining residential development, particularly for pedestrians and cyclists;
iv) The surrounding highway and transportation network has capacity to serve the development, and access and servicing arrangements can be accommodated in a satisfactory manner;
v) The proposal is fully accessible on foot, by bicycle and by public transport;
vi) Satisfactory car parking, access and servicing arrangements exist or can be provided.

The supporting text in paragraph 8.21 should be amended. Paragraphs 8.24 to 8.28 should be deleted. Paragraph 8.30 should be amended.

Background to Representations

Newport Retail Park is identified as one of twelve District Centres in the Newport UDP. In such locations there is policy support for the improvement of shopping facilities.

UDP Paragraph 6.26a adds that NRPDC is included to reflect its additional function of providing a local shopping centre for the Eastern Expansion Area (EEA). The UDP Inquiry Report (paras 6.60 – 6.62) details that the Inspector considered that the proximity and linkages to the EEA, and the fact that the centre could meet the immediate needs of the EEA, as an ‘overriding advantage’ in deciding to allocate the centre.

The Report also details that the Council sought to single out NRP from other district centres with a caveat which sought to limit any increase in sales area, or change in the range of goods to that...
justified solely to serve the Eastern Expansion Area (EEA).

At the Inquiry, the Council proposed to change this to a criterion applicable to all district centres, arguing that any increase in floorspace or range of goods sold should be limited to that justified by their roles as District Centres.

The Inspector noted that Policy SP18 provided an overarching policy which required development at District Centres to be at a scale appropriate to that centre and enhance its retail function. He also noted that PPW required the application of the sequential approach with city sites considered first, followed by edge of centre and then district centre sites and finally out of centre sites. The Inspector noted that if sites could not be identified to accommodate a particular retailer in or on the edge of the city centre, the proposed policy suggested out-centre sites should be preferred ahead of District Centres, which ran contrary to PPW.

The Inspector commented (para 6.64) that his rejection of the proposed caveats meant that NRP would not be able to expand in an unconstrained manner. He noted that Policy SP18 required that development at District Centres to be of appropriate scale and that it enhanced the retail function of those centres.

The Inspector’s comments are particularly important given the directly comparable attempts the Council are making to again, seek to restrict NRPDC’s ability to fulfil its function as a District Centre.

LDP Revised Deposit

The representor submitted objections to the Council’s proposed policy in the Deposit Local Plan (April 2012) on the grounds that a separate policy to NRPDC was not appropriate or justified. In response the Council argued that NRPDC should have a separate policy due to characteristics which distinguished it from other district centres. If this is to be accepted, the NRPDC specific policy should be justified in light of the special circumstances and the supporting text should reflect the character and role of NRPDC. Policy R7 and the supporting text do not do this.

We consider that throughout the RDLDP and Evidence Base, there is an overwhelmingly and inappropriately negative position taken in relation to NRPDC. The RDLDP fails to recognise that policy should seek to promote inter alia all district centres as the most appropriate locations for retailing, leisure and other complimentary uses and enhance its vitality, attractiveness and viability (PPW paragraph 10.1.1). Similarly, it fails to recognise the role which NRPDC has in retaining retailers, expenditure and job opportunities within Newport which would otherwise leak outside the County. Accommodating demands arising from the EEA is therefore not the only relevant function which NRPDC performs, and this other main function should be recognised in the LDP.

Policy R7

The title of the policy should be amended to be consistent with Policy R6 i.e. ‘Retail Proposals in Newport Retail Park District Centre’.

The first paragraph of Policy R7 is unnecessary. It consists entirely of information which is not appropriate to include in a Policy. The paragraph should be amended simply to clarify the status of NRP as a District Centre, with the boundary defined on the proposals map. In the interests of consistency, comparable wording should be used for the other District Centres in Policy R6.

Policy R7 is far too inflexible, especially for a plan which runs to 2026. It seeks to prejudice and stifle expansion of floorspace regardless of prevailing circumstances (e.g. changes to population and expenditure growth). A criterion based policy such as in Policy R6 enables proposals to be considered and tested as and when they come forward. The Council’s policies prejudice proposals at NRPDC for the entire plan period.

Criterion (i) is unsubstantiated by the evidence base; it is unnecessarily detailed; and it is prejudicial as it assumes a new store in excess of 929sq m up to 2026 will be harmful. It is contrary to the PPW requirement to ‘enhance the vitality, attractiveness and viability’ of centres (including district centres). It ignores the fact that there are extant consents which would permit a further foodstore in excess of 929 sq m. Aside from this, it would protect Tesco’s monopoly status in the centre which would be contrary to paragraph 10.3.2 of PPW which states that “it is not the role of the planning system to restrict competition within a centre”.

Criterion (ii) is poorly worded; unsubstantiated by the evidence base; unnecessarily detailed; and prejudicial to fulfilling the policy objective to ‘enhance the vitality, attractiveness and viability’ of the centre. The proposed imposition of a criterion where proposals above a notional 500 sq m above a floorspace figure inexplicably selected from January 2013 is confusing. There should be no such threshold in the policy, but in any event as written it is unclear whether the intention is for the threshold to be incremental on a case by case basis or absolute. The policy seeks only to permit ‘services for the EEA’. This is imprecise and entirely inappropriate for a District Centre. It simply cannot be justified. Fundamentally, it fails to acknowledge the dual role that the District Centre has: i) its original role as an important provider of retail services, retaining expenditure and jobs within Newport; and ii) a centre to serve the needs of the emerging EEA.
Criterion (iii) tellingly takes an unjustified and unnecessarily negative approach when compared with Criterion (ii) of Policy R6, when they in fact seek to secure the same policy objective. The alternative wording is unjustified.

Criterion (iv) is unnecessary given that Policy R8 applies equally to all District Centres. There is no justification to seek to restrict ‘other class A services and related community facilities’ to those which ‘primarily serve the EEA’. This is imprecise and again fails to recognise the dual role of NRPDC.

Criterion (v) should be amended to state that proposals should ‘make appropriate provision for’ links to the adjoining residential development rather than ‘enhance and improve’.

Criteria (vi) to (viii) are acceptable.

The final paragraph in the policy refers to the definition of ‘retail floorspace’. The definition is overly complex, but in any case it is unnecessary to include this in the policy. In accordance with our suggested amendments it is also superfluous as it only relates to Policy R7 (i) and (ii) which we consider should be replaced, thereby making the definition unnecessary. Aside from this, any such definition should be in a glossary as recommended by the Council’s advisors, and should apply to all retail floorspace in centres, not just NRPDC.

In summary, the title of the policy should change and the first paragraph should be reduced. Policy R7 criteria (i) – (ii) should be deleted and replaced by criteria (i) of Policy R6. Policy R7 criterion (iii) should be replaced by Policy R6 criterion (ii). Policy R7 criterion (iv) should be deleted as it is unnecessary given Policy R8. Policy R7 (v) should be reworded as detailed above. Criterion (vi) – (viii) should be renumbered to reflect revisions. The final paragraph should be deleted.

Our proposed revised Policy R7 is as follows:

**R7 Retail Proposals in Newport Retail Park District Centre**

The Newport Retail Park District Centre is defined in Inset Plan 25. Improved Shopping facilities will be favoured providing that:

i) The proposal is of a scale appropriate to the District Centre;

ii) The proposal would not have an adverse impact on the vitality and viability of the city centre;

iii) The siting and design of the proposals make appropriate provision for links to the adjoining residential development, particularly for pedestrians and cyclists;

iv) The surrounding highway and transportation network has capacity to serve the development, and that access and servicing arrangements can be accommodated in a satisfactory manner;

v) The proposal is fully accessible on foot, by bicycle and by public transport;

vi) Satisfactory car parking, access and servicing arrangements exist or can be provided.

In addition to Policy R7, we have a number of concerns about the supporting text. Paragraph 8.21 refers to NRPDC having ‘more than sufficient floorspace and types of traders present to fulfil a role as a District Centre’. There is no detail in the text or indeed the Evidence Base to explain what is ‘sufficient’, or the basis on which this judgment has been reached. The concept appears to have been invented merely for the purpose of attempting to justify a highly restrictive policy. It continues that further development ‘will pose a threat’ to the city centre. Again, this sweeping generalisation is unjustified and unsubstantiated by the Evidence Base. Proposals should be assessed under our suggested revised criteria in Policy R7 should a proposal for an increase in floorspace come forward.

In light of our suggested changes to the policy, paragraphs 8.24 to 8.28 would be rendered superfluous following the deletion and replacement of the Policy R7 criterion they concern.

Paragraph 8.30 refers to the ‘primary purpose of the NRPDC is to serve the EEA’. This appears, correctly, to recognise that NRPDC does indeed have ‘another’ purpose, which is not a secondary purpose but an equally important one, but this is not identified either in this paragraph or elsewhere in the LDP. The paragraph should therefore be amended to reflect the dual purpose of the centre, which is to provide retail services, and retain retailers, expenditure and jobs in Newport, as well as to service the needs of the EEA.

The RDLDP refers to the Newport Retail Park being shown at Inset 25, however it is apparent that the wrong plan has been mistakenly used and should be replaced to reflect the boundary defined on the Proposals Map.

Evidence Base Justification
The Retail Evidence Base is provided by the Colliers Study (2010), and the District Centres Background Paper (June 2013).

The Colliers Study notes that there is potential for NRPDC to change the nature of the goods it sells and thereby to compete with the city centre for the sale of non bulky comparison goods (Colliers summary paragraph 14). They recommend 'notwithstanding its district centre designation' that the sale of comparison goods is restricted to bulky goods.

The tests of scale and impact in Policy R6 adequately provide policy protection against inappropriate development, and could be introduced into Policy R7.

Colliers own figures suggest that NRPDC is trading at 24% below benchmark levels for comparison goods floorspace, whereas the City Centre which is trading at 38% above benchmark levels (Colliers Appendix 5 Table 8). Given this, it is difficult to understand how it can be concluded that NRPDC is a 'threat' to the City Centre. This conclusion is contrary to the 'Evidence Base'.

The Colliers Study identifies a significant expenditure leakage from Newport – estimated at 55% of non-bulky comparison goods spending. The same source estimates that NRPDC accounts for just 9% of available non-bulky comparison goods expenditure in Newport. Regrettably, the study does not provide the details of where expenditure is leaking to, but it is likely that Cardiff, Cwmbran and Bristol are key competitors (as suggested at para 8.30 of the Colliers study). The leakage from Newport is six-times greater than the turnover of NRPDC.

The Evidence Base does not support the assertions of harm or potential harm arising from NRPDC that are littered throughout the Colliers Study, LDP Background Papers and Revised Deposit LDP. NRPDC is wrongly being singled out as a 'threat' to the vitality and viability of the city centre, when the Council's own evidence should confirm that expenditure leakage is the biggest threat. It is therefore unjustified and irrational to seek to sterilise NRPDC when it should, along with the city centre and other defined centres, be promoted as a focus for growth in accordance with PPW, in order (inter alia) to reduce expenditure leakage from the city.

It is therefore illogical for the Council to adopt a policy which would materially harm a District Centre which could help to reduce the expenditure leakage. The evidence base provides no evidence to prove that NRPDC has materially harmed the City Centre, nor any basis to conclude that preventing expansion at NRPDC will result in a harmful diversion of trade from the City Centre rather than reducing leakage of expenditure to locations outside the City.

The Evidence Base does not provide a logical or rational justification for the RDLDP policies. The Evidence Base and RDLDP policies seek to prejudge any proposals which may emerge at NRPDC during the plan period as being harmful to the city centre, regardless of nature, scale, or circumstances. This is unreasonable and unnecessary given that RDLDP Policy R6 provides sufficient safeguards, which could be introduced into Policy R7 for the Council to resist development proposals which are of inappropriate scale to the District Centre, and which are likely to have an adverse impact on the health of the City Centre.

Conclusions

The LDP is therefore unsound under the following tests of soundness:

i) Consistency Tests
   • C2: The plan is in conflict with PPW in including draft policies which actively seek to inappropriately constrain the potential growth of a District Centre and which are therefore likely to undermine the functioning and health of the Centre.

ii) Coherence and Effectiveness Tests
   • CE1: The RDLDP does not set out a coherent retail strategy and draft Policies SP20, R6 and R7 do not logically flow from each other.
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If Policy R7 is to be retained, it should read as follows:

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The Newport Retail Park District Centre is defined in Inset Plan 25. Improved Shopping facilities will be favoured providing that:
### Representation Details

**by:** (No grouping)

**Filtered to show:** (all of) Stage=L; Status=M

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The proposal is of a scale appropriate to the District Centre;

- The proposal would not have an adverse impact on the vitality and viability of the city centre;
- The siting and design of the proposals make appropriate provision for links to the adjoining residential development, particularly for pedestrians and cyclists;
- The surrounding highway and transportation network has capacity to serve the development, and that access and servicing arrangements can be accommodated in a satisfactory manner;
- The proposal is fully accessible on foot, by bicycle and by public transport;
- Satisfactory car parking, access and servicing arrangements exist or can be provided.

The supporting text in paragraph 8.21 should be amended. Paragraphs 8.24 to 8.28 should be deleted. Paragraph 8.30 should be amended.

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**Item Question** Council Responses

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12/02/2014 Page 613 of 1581
Boundary

The preparation of the Local Development Plan (LDP) is an appropriate time to review boundaries defined in the Plan. Accordingly a review of all district centres allocated in the Adopted Unitary Development Plan has been undertaken for the preparation of the LDP. The definition of a boundary for Newport Retail Park District Centre within the LDP is of particular importance as the UDP does not define a boundary, with the East Newport Development Framework Supplementary Planning Guidance and appeals decisions forming the basis of a boundary. The defined boundary in the Revised Deposit UDP seeks to reasonably provide Newport Retail Park District Centre with a defensible boundary for Development Management purposes and give certainty to future investors, developers and officers in terms of defining the retail centre on a clear and adopted Plan, confirming its position in the retail hierarchy for the application of the sequential test and implementation of retail planning policy, and reflecting its role as a district centre to serve the eastern catchment area.

The exclusion of the part of the park next to the EEA is also considered appropriate. The layout and function of the area between the defined centre in the LDP and the intervening boundary with the Eastern Expansion Area is different to the proposed defined centre area. It is separated from it by the estate access road and retail units such as Marks and Spencers back onto the area with opportunities for full integration limited. The area functions predominantly as a car sales and leisure area dominated by car sales areas, the large vacant Megabowl unit and a large cinema with smaller scale A3 users scattered around the southern end. Matalan occupies a remote position in the northern portion. Whilst it is acknowledged that the area is an established commercial and leisure area with a number of extant permissions, notably for retail uses, there are no existing direct connections between this area and the Eastern Expansion Area and uncertainty in terms of whether these can ever be achieved in the longer term. The existing pedestrian route via the Queensway roadside pathway offers the existing and most realistic pedestrian link from the EEA in the long term. There is a desire to secure the infrastructure to improve access from this route into the district centre and within the district centre itself, and to facilitate a pedestrian link within this area to meet the intervening boundary. The most obvious place to locate this is at the northern end of the Megabowl unit. This was secured as part of an extant but currently unimplemented permission to convert the unit to a supermarket. However, the ability to secure a continuation of this link on the EEA side of the boundary is also uncertain. Therefore, at this time a pedestrian link between the district centre and the residential development within the EEA, over and above the existing roadside pathway, is an aspiration for the Council but cannot currently be guaranteed.

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Issue – Inspector’s Report

It is acknowledged that a similar set of arguments were discussed at the UDP Inquiry and the Inspector recommended the Plan should not include any caveats for Newport Retail Park District Centre. However, the preparation of the LDP provides an opportunity to review policies and assess whether they are achieving their objectives. For this reason the policy approach taken towards NRPDC has been reviewed alongside the evidence and policy recommendations set out in the Collier’s Retail Study and Capacity Assessment (July 2010). A new policy approach in the Local Development Plan is therefore considered acceptable and justified. The concerns raised by the Council in the UDP inquiry have been realised, and Newport Retail Park has significantly adversely affected the vitality and visibility of the City Centre. In order to maintain the primacy of the City Centre, steps must be taken to limit the expansion of Newport Retail Park so that it functions as a District Centre.

Separate Policy Approach

A separate policy approach to NRP is considered justified and in accordance with PPW (5th ed, Nov 2012) which notes that development plans should establish existing hierarchy of centres and be clear about their future roles (10.2.1). Within this context Policy R7 has been prepared as the Council considers Newport Retail Park District Centre to be different to its other district centres and to have greater potential to have an impact on the City Centre. This is supported by the findings of the Colliers Retail Study and Assessment (July 2010). The Study notes that 55% of Newport’s occupied retail floorspace in district centres is at Newport Retail Park District Centre. The Centre’s potential to compete with the City Centre is also acknowledged at paragraph 8.25. Notwithstanding, the district centre allocation, the Collier’s Study recommends a number of policy restrictions that should be considered for Newport Retail Park District Centre (para 8.30 – 8.39). Policy R7 seeks to incorporate these recommendations in a way that allows retail development that is appropriate in scale to a district centre and does not impact on the vitality and viability of the City Centre.

Policy Title

For consistency and clarification purposes a revision to the Policy title is considered acceptable. The title will now read “Retail Proposals in Newport Retail Park District Centre.”
Opening part of the Policy
Past experience of retail applications submitted in relation to Newport Retail Park District Centre, is that applicants submit evidence defining it as a town centre for the purposes of the application of the sequential test. Defining NRP as a District Centre within the policy clearly establishes its position in the retail hierarchy and sets out the approach the Council will take in assessing proposals that come forward.

The justification for allocating Newport Retail Park as a District Centre was to serve the Eastern Expansion Area, without this purpose it would have remained an out-of-centre retail park. Policy R7 reflects this in the opening part of the policy to clearly set out its primary function. Its wider role of serving the surrounding settlements will be reflected in paragraph 8.22.

Policy R7 prejudges applications for the Plan period
The Colliers Retail Study and Capacity Assessment (July 2010) and follow up letter dated February 2013 have formed the evidence and background work to the preparation of Policy R7. The Colliers Retail Study covers the plan period up to 2026 and has made policy recommendations for an appropriate LDP response for this period.

Criterion (i)
Extant consents remain unaffected by the proposed policy. However, should they lapse new applications would be subject to the Local Development Plan policies once adopted. Criterion (i) is derived from the Colliers Retail Study recommendations that notes “further expansion of convenience retailing would change the function and character of the centre, expanding it beyond what is appropriate in a district centre and thereby changing its position in the hierarchy (para 8.37). This point is expanded upon in the Collier’s Supplement (February 2013) which seeks to ensure convenience retailing proposals that come forward are of an appropriate scale to a district centre. The threshold of 929sq m retail sales floorspace is considered appropriate as the Collier’s Supplement states, based upon the current actual retail sales floorspace of operators, it would permit smaller stores serving a local function, such as convenience stores, discounters and small supermarkets, but would prevent the addition of new superstores which are likely to draw trade from a wider area.

Criterion (ii)
The January 2013 date is a point in time to provide a basis to measure any increase/decrease in net retail floorspace in the district centre. The thought process to this criterion is set out in Collier’s Supplement (February 2013) which notes the approach would be to make larger scale redevelopment in the centre or its extension, subject to the same tests as out of centre development – justified on the basis of the unusual justification for the district centre’s designation...this approach would also enable the sequential approach to be applied in a controlled manner.”

The net increase figure is an absolute figure based on the net floorspace as measured at January 2013. It is felt this criterion, allows any potential expansion to be monitored and implemented at a scale appropriate to the district centre’s position in the retail hierarchy. As noted above the justification behind allocating Newport Retail Park as a District Centre was to serve the Eastern Expansion area, this principal function has not changed, although paragraph 8.22 has been updated to reflect its wider role.

Criterion (iii)
Colliers Retail Study (July 2010) at paragraph 8.35 notes there is potential for Newport Retail Park District Centre to change the nature of the goods it sells and thereby to compete directly with the City Centre for the sale of non-bulky comparison goods. Criterion iii is therefore considered to be justified in the interest of protecting the vitality and viability of the City Centre.

Criterion (iv)
It is noted that Policy R8 also covers non retail uses in District Centres, however criterion iv) of Policy R7 seeks to ensure the proposed use is of a scale appropriate for a district centre and Newport Retail Park’s primary purpose of serving the Eastern Expansion Area.

Criterion (v)
The suggested wording is not considered to change the purpose of the criterion, therefore no change is proposed to the Plan.

Definition of Retail Floorspace
A definition of retail sales floorspace has been added to the Plan to aid measuring it when considering applications and set out clearly the Council’s interpretation of retail sales floorspace. It has been included within the policy text to aid the reader. However, it is accepted that it is a definition rather than policy. The definition will be retained, but added to the supporting text.

Paragraph 8.21 – The evidence base to Policy R7 is set out in the Collier’s Retail Study, which is referenced throughout the supporting text. The following sentence will be added to paragraph 8.21 to reflect the positive contribution Newport Retail Park District Centre has made in providing jobs, services and retail provision for the Eastern Expansion Area:

"Newport Retail Park District Centre has successfully developed into a centre which provides shops, jobs and helps retain retail expenditure within Newport. However ..............."
Paragraph 8.24 – 8.28
As no changes are proposed to criteria (i) and (ii) of Policy R7, paragraphs 8.24 – 8.28 remain relevant.

Paragraph 8.30
Paragraph remains relevant as it supplements criterion iv).
## Soundness Test

The LDP is therefore unsound under the following tests of soundness:

i) Consistency Tests

   • C2: The plan is in conflict with PPW in including draft policies which actively seek to inappropriately constrain the potential growth of a District Centre and which are therefore likely to undermine the functioning and health of the Centre.

ii) Coherence and Effectiveness Tests

   • CE1: The RDLDP does not set out a coherent retail strategy and draft Policies SP20, R6 and R7 do not logically flow from each other.

   • CE2: The retail strategy, policies and allocations are not founded on a robust or credible evidence base.

   • CE4: Policy R7 has insufficient flexibility to respond to changing circumstances.

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### Representation

See Representation 3160.L1 under Policy R6 for full representation

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### Item Question

#### Soundness of LDP

**Tick-box reply**

- **Soundness of LDP**: No
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12/02/2014  Page 618 of 1581
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Paragraph 8.30
Paragraph remains relevant as it supplements criterion iv).

3160.L3/SP20
Stadium Newport Limited
RPS Group PLC
25/07/2013
E O M

Document: Revised LDP, p.35
Policy: SP20
Summary: Objection/Amendment to R6/R7 and SP20

10 Soundness Test

i) Consistency Tests
• C2: The plan is in conflict with PPW in including draft policies which actively seek to inappropriately constrain the potential growth of a District Centre and which are therefore likely to undermine the functioning and health of the Centre.

ii) Coherence and Effectiveness Tests
• CE1: The RDLDP does not set out a coherent retail strategy and draft Policies SP20, R6 and R7 do not logically flow from each other.
• CE2: The retail strategy, policies and allocations are not founded on a robust or credible evidence base.
• CE4: Policy R7 has insufficient flexibility to respond to changing circumstances.

11 Representation
See Representation 3160.L1 under Policy R6 for full representation

2 Soundness of LDP

The representation is considered to be raising concerns with Policy R6. A detailed response is provided in relation to representation 3160.L1.
<table>
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<tr>
<th>Rep'n/Para/Policy</th>
<th>Agent</th>
<th>Accession No</th>
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<tr>
<td>University of Wales Newport</td>
<td></td>
<td>05/07/2013</td>
<td>E</td>
<td>O</td>
<td>M</td>
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**Document:** Revised LDP, p.91  
**Policy:** R01  
**Summary:** Plan should be more explicit about how the Council and University will work together to help boost economy.

### Item Question: Soundness Test

#### Coherence and effectiveness.

**Representation Text:**

The plan for the city centre talks about growth, but does not indicate what will create that growth or where the additional business will come from. The new University campus in the City Centre is one of the significant developments that have happened in the last few years, yet barely gets a mention. There has been a lot of work done recently on the multiplier effects of University on local economies and the benefits that they bring to local businesses, including on local cafes and bars - just the areas the LDP is proposing to see increase. The plan should therefore be more explicit on how the council and the University should work together both in terms of future developments in the City, to increase student numbers and to create spin out companies to help boost the local economy. The same of course applies to Caerleon.

### Item Question: Speaking at Public Examination

#### Council Responses

**Item Question**  
**Tick-box reply**

2 2  

**Soundness of LDP**  

No

### Council Response

The Local Development Plan is primarily a land use plan that sets out future land use development proposals and policies for assessing proposals that come forward in the future. Details of what will create the growth and where business will come from is still to be determined in some cases, particularly in relation to employment. The LDP works in partnership with other Council documents and strategies that aim to attract investment and employment opportunities, such as the Economic Development Strategy and Newport 2020 Masterplan Review and Refresh. The LDP seeks to ensure that sufficient land is available to implement such strategies. It is agreed that the City Centre Campus has benefited the vitality of the city centre, and the Council had this outcome in mind when it supported and part-funded its construction. Furthermore, land is allocated to support the development of Phase 2 of the campus.
<table>
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<tr>
<th>Item Question</th>
<th>Representation Text</th>
<th>Tick-box reply</th>
</tr>
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<tbody>
<tr>
<td>10</td>
<td>Soundness Test</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>The plan fails CE1, CE2 and CE4</td>
<td></td>
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<tr>
<td>11</td>
<td>Representation</td>
<td></td>
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<tr>
<td></td>
<td>Objection to paragraph 6.34 – Cardiff Road, Monmouthshire Banks Sidings Reference is made under supporting text to EM2 (paragraph 6.24) to the northern part of the site close to Cardiff Road being identified for employment uses. This should be revised in line with any revision to EM2(ix) (discussed above) given that objections have been made to removing reference under EM2 to the site or seeking any specific uses for the site. In short, the change sought is the deletion of paragraph 6.24 or revise in line with changes to EM2(ix).</td>
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<td>12</td>
<td>Speaking at Public Examination</td>
<td>Yes</td>
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<td></td>
<td>Given the strategic importance of the Monmouthshire Bank Sidings site within the Revised Deposit Local Development Plan, these representations require full examination and representation before the Inspector at the relevant hearing sessions.</td>
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**Additional material submitted**

**Document:** Revised LDP, p.81, para.6.24

**Policy:** EM02.09

**Summary:** Remove any reference to employment land at Monmouthshire Bank Sidings

<table>
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<tr>
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<td>Savills</td>
<td>02/08/2013</td>
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**Newport City Council Local Development Plan**

**Soundness Test**

The plan fails CE1, CE2 and CE4
### Representation Details

**Filtered to show:** (all of) Stage=L; Status=M

<table>
<thead>
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**Document:** Revised LDP, p.81  
**Policy:** EM02.09  
**Summary:** Objection to EM2(ix) and associated allocations on the Proposals Map

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CE1, CE2 and CE4
The RDLDP refers to an area of 1.2ha of the MBS site under regeneration policy EM2(ix). For the reasons set out in full below, an objection is raised to this policy on the basis that it is unnecessary. The land identified in EM2(ix) was also considered at the recent public inquiry but on the basis that there were no land use proposals for it. As such, it was included as "white land" within the red line of the appeal submission. The land was left devoid of a proposal (other than to accommodate a new access to the site) in order to allow for some potential for mixed use within the MBS site in the future should the adjacent WW site come forward for mixed use development.

The need to reserve the 1.2ha for employment or health care uses was considered at the public inquiry. Lack of Justification for Healthcare Reference

It was established at the inquiry that there was no need to retain this land for any healthcare uses and that despite the long term aspiration of NCC to see the MBS and WW sites developed for high profile healthcare uses, there was no evidence of any demand from the Health Board or any aspirations to develop the site other than from NCC and its partners, such as Newport Unlimited. This matter has been debated for a long period of time, as far back as the UDP inquiry in 2003 where it was also established that there was no firm justification for reserving the sites for the healthcare uses. There remains no justification for retaining the land for healthcare uses and as such, objections are made below to the policy and to the reference to healthcare uses.

Lack of Justification for B1/B8 References

NCC adopted a brief for the MBS / WW sites entitled "Monmouthshire Bank Sidings/Whiteheads Draft Planning Framework SPG" prior to the public inquiry. This set out preferred strategic connections and land uses across the two sites, including that the northern section of the MBS site should be reserved for employment uses (circa 11ha).

Comprehensive objections were made on behalf of Network Rail (the landowners at the time) and RHSW to the brief. Objections were made on the basis that the planning brief / SPG should carry little or no weight given the lack of justification for employment / healthcare uses within the site, that it would undermine the ability to progress regeneration across the two sites and, that there was no justification for requiring a southern access. The fundamental objection was that the MBS and WW sites did not need to be brought forward under the terms of the Planning Framework SPG. Importantly, the Inspector agreed with a number of the objections expressed and ultimately gave very little weight to the brief in terms of the distribution of land uses within the MBS site.

Paragraph 209 of the Inspector’s report into the MBS inquiry concluded that there is adequate supply of employment land in Newport, in particular noting it was established that 65 years worth of unconstrained employment land was available. The Inspector concluded at paragraph 214 that "the need for additional employment land to that allocated in the UDP and which was considered as part of the context of the H1 and other allocations, is not made out. Therefore, I have forwarded this material consideration little weight."

Therefore, the Inspector came to the firm conclusion that there was no need to retain any part of the MBS site (including the land now identified under EM2(ix) of the RDLDP) for employment use. The Planning Framework SPG has now been superseded through the grant of planning permission on the MBS site. It was found to be of limited weight in the appeal process itself in terms of land uses and has been overtaken in terms of the Inspectors conclusions on the access needs for to the site. Essentially, the adopted brief is now defunct and should have no material impact upon allocations within the RDLDP. The site subject to EM2(ix) is dealt with as part of a Unilateral Undertaking (UU) in respect of the MBS permission. The UU identifies 1.2ha of the site for possible employment purposes, within the locations identified on the RDLDP Proposals Maps under EM2(ix).

Given the abundant supply of employment land within Newport, and the conclusions of the Inspector, it would be practical to plan for flexibility of the use of the EM2(ix) land to be considered within the life of the plan up to 2026. There is no justification for including the EM2(ix) land within the regeneration site policies. Instead it should either be referred to as ‘white land’ within the RDLDP. The site is within settlement boundaries and would be suitable for assessment against general development control policies for a variety of uses. This would allow for a range of uses including those put forward under EM2(ix), subject to the normal development control tests. This would retain ultimate flexibility for the land and, should the best efforts to comply with the terms of the UU not yield a B1 user within a reasonable timeframe, it would allow for alternative forms of development of this sustainably located site.

In short, the change sought is the deletion of reference to the MBS site from Policy EM2(ix) and removal of the same notation from the associated Proposals Map. For the avoidance of doubt, policy annotation H1(14) should be retained as proposed in the RDLDP.

Speaking at Public Examination

Given the strategic importance of the Monmouthshire Bank Siding site within the Revised Deposit Local Development Plan, these representations require full examination and representation before the Inspector at the relevant hearing sessions.
**Representation Details**

<table>
<thead>
<tr>
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<th>Representation Text</th>
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<tbody>
<tr>
<td>11</td>
<td>Support for Policy H1(14) RHSW are committed to developing the site in the short term and agree that 575 units should be delivered within the plan period up to 2026. In short, support is therefore provided for the identification of the site as a housing commitment, to be delivered within the plan period up to 2026.</td>
</tr>
<tr>
<td>12</td>
<td>Speaking at Public Examination Yes Given the strategic importance of the Monmouthshire Bank Sidings site within the Revised Deposit Local Development Plan, these representations require full examination and representation before the Inspector at the relevant hearing sessions.</td>
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**Council Responses**

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<th>Item Question</th>
<th>Council Response</th>
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<tr>
<td>13</td>
<td>In the long term interests of the LDP, it is considered that the site at Cardiff Road (Monmouthshire Bank Sidings) should remain within the LDP as a Regeneration Site. If permissions ever lapse or building work ceases on site, the flexibility needs to exist to allow new development to take place. Support noted.</td>
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**Document: Revised LDP, p.65**

**Policy: H01.14**

**Summary: Support Policy**

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**Additional material submitted**
### Representation Details

by:  (No grouping)

Filtered to show:  (all of) Stage=L; Status=M

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<td>Alfieri, Mr Nicholas</td>
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<td>29/07/2013</td>
<td>E</td>
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Document: Revised LDP, p. 109

Policy: CF08

Map: Proposals East: Proposals Plan - East

Summary: Convert barns into residential holiday lets.

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Additional material submitted - Please click here

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**Item Question** | **Representation Text**
---|---
4 | 4 | A new paragraph or new text | Yes
This statement and documents are intended to vary the Proposed Policy regarding Changing the Use of existing agricultural buildings in the Open Countryside into Holiday Lets.

This document has additional details that can be used by the Council to ascertain how certain sites (that would currently fall outside the proposed policy) but should be viewed as acceptable.

**SITE LOCATION**

The application site is located immediately adjoining the Llandevaud Inset Map 11. A Location Plan is attached.

The land is agricultural.

**PROPOSAL**

My client seeks to have a Use applied to his land to permit the Change of Use of the existing buildings to be used as residential Holiday Lets. The proposal is to convert the existing agricultural buildings into compact one / two bedroom self contained holiday lets. There is growing demand for this type of accommodation. The site affords excellent views over countryside towards Newport and would, without question be highly desirable. The scheme would encourage tourists to visit; currently Newport has a lack of such accommodation. The site falls just outside the Village Boundary of Llandevaud. Ordinarily a relatively straightforward planning application would be lodged to seek planning consent; however the buildings do not have any real architectural merit and fall within Open Countryside, so would be refused. The site is used daily by my client. The site has a good access and is of an excellent size. The proposals would be carried with a scheme to improve visibility at the junction with the public highway. The scheme would not, in any manner, be of harm to the locality.

**Sustainable use of land - Objective 1**

To ensure that all development makes the most efficient use of natural resources by seeking to locate development in the most sustainable locations, minimising the impact on the environment and makes a positive contribution to local communities.

The buildings are existing agricultural buildings – they would be retained and adapted as necessary. The buildings are immediately adjacent the existing and proposed Llandevaud Village Plan. Despite being characterised as ‘Open Countryside’ in planning terms it could be viewed as a natural extension to the village boundary. Utilising this land is a sustainable use of land – due to its location adjacent a built up area residential village.

**Climate Change - Objective 2**

To ensure that development and land uses in Newport make a positive contribution to helping to minimise the causes of climate change and to mitigating the impacts, by incorporating the principles of sustainable design, reducing the need to travel, providing safe and active travel routes, and managing the risks and consequences of flooding.

The reuse of existing buildings and being converted to comply with current Building regulations is an extremely environmentally friendly type of development. The Holiday Lets would be served by a Package Type Private Treatment plant – to serve foul drainage, thus not applying any additional pressure on the existing utility infrastructure. The storm water would provide the opportunity to reuse ‘grey’ water, and then discharge to soakaways. The development does not lie within a Flood Risk area; neither will the development increase the risk of flooding to any other property.

**Economic Growth - Objective 3**

To enable a diverse economy that meets the needs of the people of Newport and those of the wider South East Wales economic region.

Newport has seen an increase in tourists. This is in part to the Ryder Cup being hosted in Celtic Manor in 2010. Newport has seen an increase in tourists. This is in part to the Ryder Cup being hosted in Celtic Manor in 2010. There was a lack of quality tourist accommodation in the immediate area; however more appropriately a lack of variety. Although Celtic Manor is a first class resort, it does not offer the less developed and more personal, tranquil setting that this site can offer.

Wales, from a Tourist point of view, projects itself as being quaint and of beautiful countryside. This project ticks both boxes – with stunning views over nearby countryside and within nearby access of a major road – the A48. It isn’t hard to visualise the finished article in a holiday brochure. The site is more consistent with Monmouthshire than Newport; and Monmouthshire fully value the importance of such Holiday lets. The development, by means of being of great requirement would bring additional trade, albeit small, to this rural part of Newport.

**Housing - Objective 4**

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 meets the needs of the population. Also to foster the creation of places which contribute to local distinctiveness and thriving communities.

The proposal is to change the use of existing and currently used agricultural buildings into two compact sized holiday lets. They are not to be seen as permanent dwellings – a planning condition would be attached to enforce their numbers of months of use.

Conservation and the Environment

Objective 5
To ensure that all development or use of land does not adversely affect, and seeks to preserve or enhance, the quality of the built environment. The buildings and access are existing. The access and buildings are currently used daily by the applicant. The modifications would relatively minor, and would not be visible to the wider public. Cars would be parked to ensure that they are not visible to ensure that the area remains, visually, part of the countryside.

Objective 6
To protect and enhance the quality of the natural environment, including protected and non-protected species and habitats, regardless of Greenfield or Brownfield status, and also including the protection of controlled waters. The proposed scheme would include a hedgerow planting scheme to the North boundary; as well as new hedgerow to the rear of the new visibility splay – both measures would enhance the visual appearance of the lane.

Community Facilities and Infrastructure - Objective 7
To ensure the provision of appropriate new, and/or enhanced existing, community facilities. The development is minor and will not allow for any new community provisions. Visually the lane will be improved.

Culture and Accessibility - Objective 8
The principle that services and facilities should be sustainable and safely accessible to all regardless of culture, age, gender, and impairment is considered important to achieving sustainable development. Development proposals should therefore provide convenience and enjoyment of use for all and strive to enhance cultural identity. To ensure that development proposals and uses are socially and physically accessible to all, taking account of the needs of all individuals. The development will be fully disabled accessible.

HIGHWAYS AND PARKING-
The proposed Holiday Lets would use the existing access point onto the existing Llandevaud Road – an adopted Highway.
The scheme would include improving the visibility at the intersection with the public Highway – by means of a planted hedgerow set at the correct angle at the intersection to maximise visibility. The scheme would ensure that the maximum visibility is achieved at 2.4m from the road edge.
The scheme currently has an ad-hoc parking arrangement. The parking area is suitably large enough to permit a parking layout to the planners and Highways approval.

ACCESS STATEMENT-
The site is accessible by private transport; buses frequently use the A48 main trunk road. The lane, although narrow, is used frequently by walkers. There is no reason as to why users of the Holiday Lets could use the site exclusively by foot or cycle.

MOVEMENT WITHIN THE SITE-
The site, although close to bus routes, will make use of private cars and bicycles. The occupiers / members of the public will continue to use the same vehicle access point, as detailed on the OS Plan. The improved access point will improve the existing visibility at the access point to the roadway. There isn’t a public footway at this part of the Lane. The pedestrians accessing the site will not feel at risk – this is reinforced by the number of dog walkers, joggers and local residents who regularly walk on the lane.
The site will have a level access into the proposed dwelling.
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<td>Comments noted; however, since specific proposals cannot be addressed in the LDP, a full application for planning permission would be required. It is considered that the LDP policies provide adequate guidance and support for rural tourism. No change is needed to CF08.</td>
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**Representation Details**

**Document:** Revised LDP, p.73

**Policy:** H10

**Map:** Proposals East: Proposals Plan - East

**Summary:** Allow conversion of agricultural building for holiday lets.

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**Speaking at Public Examination**

**Change of use in countryside and conditions relating to.**

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<td>Soundness of LDP</td>
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**Council Response**

Policy H10 specifically notes that it is applicable to residential use only, this would not include holiday lets. There are separate policies within the plan which would be utilised when assessing an application for holiday lets.
### Representation Details

**Rep'n/Para/Policy** | **Representor** | **Accession No** | **Date Lodged** | **Late?** | **Source** | **Type** | **Mode** | **Status** | **Status Modified**
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3202.L1//H01.30 | Persimmon Homes (East Wales) | Nathaniel Lichfield & Partners | 07/08/2013 | ☐ | E | I | M | Filtering to show: (all of) Stage=L; Status=M

**Document:** Revised LDP, p.68  
**Policy:** H01.30  
**Summary:** Background to NLP Reps

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### Item Question | Representation Text
--- | ---
11 | Representation  
1.0 Background  
	n These representations have been prepared by Nathaniel Lichfield & Partners on behalf of Persimmon Homes (East Wales).  
	n The representation relates to our client’s land interests at a proposed residential site at the rear of the South Wales Argus site, off Bideford Road, Newport. The Revised Deposit Local Development Plan (LDP) now allocates this Site as a new housing allocation under Policy H1 (30).  
	n The brownfield site measures approximately 2.3 hectares, currently consisting of an area of concrete with no on-site buildings, a car park and some derelict 1, 2 and 3 storey buildings which were formally utilised for the printing of newspapers approximately 4 years ago. Also to the east of this area, beyond the car park, is an area of re-vegetated scrub land.  
	n As this Site is now a proposed housing allocation in the LDP we have not submitted a separate Sustainability Appraisal (SA), as the allocation of this Site has been considered as part of the SA/SEA for the Revised LDP.  
	n In accordance with Newport City Council’s representation form, we set out our client’s comments on the Revised Deposit LDP below.

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### Item Question | Council Responses
--- | ---
12 | Speaking at Public Examination  

To ensure the identified issues are fully considered and discussed at Examination

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### Item Question | Tick-box reply
--- | ---
2.2 | Soundness of LDP  

No

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### Item Question | Council Responses
--- | ---
13 | Council Response  

Noted.
Item Question  Council Responses

11 11 Representation

Section 1: Achieving the Vision – Strategy and Plan

Objective 1 (Sustainable Use of Land), 3 (Economic Growth) and 4 (Housing Provision).

Our client continues to support LDP objective 1 and 4 which seek to locate development in the most sustainable locations, particularly where this can also deliver the regeneration of appropriate previously developed sites. This ensures new development is located within areas that already offer existing infrastructure such as local services and public transport opportunities.

Our client also supports the reference made in paragraph 1.27 of the Revised Plan (which accompanies LDP Objective 3). This paragraph recognises the economic contribution the housing sector makes via the construction industry and consequently the local economy. Whilst our client welcomes this reference, for accuracy, the direct and indirect economic impacts associated with housebuilding need to be emphasised. Such impacts relate to e.g. construction impacts (direct and indirect jobs and investment), fiscal impacts (Council Tax receipts); Section 106 contributions as well as indirect spending by new residents on retail, leisure, first occupational expenditure etc.

We continue to concur with the general provisions of objective 4 which seeks to ensure there is an adequate supply of land for housing in the most sustainable locations. The Revised LDP’s allocation of the former South Wales Argus site for housing (Policy H1 (30)) accords with this objective, as this Site is previously developed/underused urban land and its development will therefore deliver environmental improvements, as well as social and economic benefits.

The Site’s allocation for housing will also act to provide an element of choice and flexibility (as required by Soundness Test CE4) in the LDP’s housing land supply. Unlike many of the allocated housing sites in the LDP, this is a new Site which has not been rolled forward from the previous UDP and is therefore a genuinely new Site which therefore offers a greater level of choice.

Required Change:
For clarity and accuracy, paragraph 1.27 associated with Objective 4 should be rephrased so it recognises the full extent of economic benefits (direct and indirect) associated with house building.

13 13 Council Response

It is felt that paragraph 1.27, which states that growth in housing is likely to provide a significant boost to the construction industry and, consequently, the local economy, already achieves what has been suggested.
**Representation Details**

| Rep'n/Para/Policy | Agent | Accession No | Date Lodged | Late? | Source | Type | Mode | Status | Status Modified |
|-------------------|-------|--------------|-------------|-------|--------|------|------|--------|----------------|----------------|
| 3202.L3/SP01      | Nathaniel Lichfield & Partners | 07/08/2013 | O            | E     | O      | M    |      |        |                |

Document: Revised LDP, p.16

Policy: SP01

Summary: No required change

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<td>Section 2: Spatial Strategy and Strategic Policies Policy SP1: Sustainability</td>
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<td>Our client continues to support emerging Policy SP1 which seeks to ensure development proposals will make a positive contribution to sustainable development. This policy is a continuation from the LDP objectives, which seek to ensure previously developed land is prioritised against greenfield sites, in line with the provisions of PPW. The former South Wales Argus site is now a proposed housing allocation under Policy H1 (30). The Site is previously developed and is located within the defined settlement boundary. As such the Site’s allocation is consistent with the requirements set out in SP1 and would make efficient use of the land resource. In addition to this, the Site is surrounded by a mix of land uses including existing residential, retail and employment and is located close to local facilities with good access to public transport (including shops, a community hall, a primary school and a number of bus stops). The Site’s accessible location will therefore help to minimise the need for future residents to travel to meet their day-to-day needs, in line with the sustainability aims of this emerging policy.</td>
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<td>Council Response</td>
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<td>Support for Policy SP01 noted.</td>
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Emerging Policy SP10 sets out the dwellings which will be provided between 2011 and 2026 in order to meet Newport’s housing requirement. Our client continues to support the emphasis given to the provision of housing land on previously developed land and as such, the proposed housing allocation at our client’s site (the former South Wales Argus Site) is supported. This proposed new allocation will provide certainty and clarity (both for the developer, the LPA and local residents) its allocation will help to meet Newport’s housing requirement by helping to provide a choice and flexibility in the Plan’s housing land supply. However, whilst the LDP’s housing supply primarily focuses on previously developed sites, in line with the requirements of national planning policy, this approach also brings challenges. Such sites typically have high level of abnormal costs and therefore we highlight the need for LDP policies regarding e.g. Affordable Housing and Planning Obligations, to incorporate a level of flexibility, which takes into account the viability challenges posed by developing on such sites. This approach accords with Soundness Test CE4 (flexibility) and will help to ensure such sites are deliverable.

No required change.

The Affordable Housing Policy H4 does indeed take into account the possibility for each site to assess its need on viability. The planning system does recognise that sites have unique factors which will result in varied levels of costs. In addition to the abnormal costs associated with each site there are additional factors such as Building Regulations and Code for Sustainable Homes that increase the requirement to builders and therefore affect costs. Such factors are not in the control of the Local Planning Authority and are required by the conditions of the Welsh Government, who take into account the additional costs such new conditions require. Such costs are knowns and as such it is the planning systems role to ensure developments provide adequate levels of education, open space and affordable housing etc. Such costs should be taken into account at the land acquisition stage.

It is accepted that some sites will have additional costs that are not picked up through the BCIS method which may have an effect on lower value areas but which should not skew a reasonable approach based on a methodology which the house building industry recognise. The planning system has remained flexible in its approach allowing viability assessments to allow for such abnormal costs to be factored in so that the housing market can continue but it should not do so to the detriment of creating sustainable communities.
Emerging Policy SP13 states that development will be required to help deliver more sustainable communities by making contributions (via Section 106 and the Community Infrastructure Levy) to local and regional infrastructure, in proportion to its scale and the sustainability of its location.

As set out at Deposit Plan Stage, whilst our client agrees with the general principle of this policy, the wording of the policy and its supporting text continues to be too ambiguous, inflexible and it is questioned whether the policy wording accords with the tests set out in Welsh Office Circular 13/97 (Planning Obligations).

Previously submitted comments to the Deposit Plan stage, highlighted concern with the absence of any mention of viability within the policy or the supporting paragraphs - despite Policy SP10 confirming the LDP’s housing allocation strategy seeks to primarily focus upon previously developed sites. This approach is likely to yield more abnormal site costs and therefore may result in viability challenges.

It is noted that the Policy in the Revised LDP has been amended to “SP13: Planning Obligations” (as opposed to “SP13 Community Infrastructure Levy” in the previous Deposit LDP) and a reference has been inserted within supporting paragraph 2.44 which makes reference to the CIL Charging Schedule needing to be reflective of the Financial Viability Study. However our client remains concerned that no reference is included within the Policy itself and no mention appears to be made in relation to viability of S106 contributions.

As previously expressed at the Deposit Plan Stage, Policy SP13 should therefore be re-worded to include a degree of flexibility – i.e. reference stating ‘subject to viability’. This re-wording should also be reflected in the supporting paragraphs (for both CIL and section 106 contributions) to provide a degree of flexibility. This change will ensure the Plan is sound in accordance with Test CE4, which requires the Plan to be reasonably flexible to enable it to deal with changing circumstances.

Required Change:
Amendment to Policy SP13 and supporting text to specifically reference viability in relation to S106 contributions as well as CIL.
Proposals must be considered on a site by site basis to ensure development is not unnecessarily stifled and the Plan is reasonably flexible (in line with Test CE4).
### Representation Details

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**Document:** Revised LDP, p.34  
**Policy:** SP19  
**Summary:** No required change

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**Item Question**  
**Representation Text**

11 11 Representation  
This Policy states that residential proposals which assist the regeneration of the urban area (see criteria ii) and reuse of vacant underused or derelict land (see criteria iii) should be particularly favoured.

As per our previous Deposit Plan representations, our client continues to support criteria ii and iii) of emerging Policy SP19.

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**Item Question**  
**Council Responses**

13 13 Council Response  
Support Noted
Representations Details

by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M

Rep'n/Para/Policy   Representor                          Agent                          Accession No  Date Lodged  Late?  Source  Type  Mode  Status  Status Modified

3202.L7/H01.30     Persimmon Homes (East Wales)        Nathaniel Lichfield & Partners 07/08/2013    E       O       M

Document: p.68
Policy: H01.30

Summary: Clarification on affordable housing level should be provided

Item Question  Representation Text
Section 5: Housing Policy H1 (30): Housing Sites  
Section 13 “Delivery & Implementation Plan”

The former South Wales Argus site is now currently allocated for residential use under Policy H1 (30) and we set out our client’s specific comments below:

Principle of a housing allocation

Our client unequivocally supports the proposed housing allocation. It is consistent with the Plan’s Strategy (in accordance with soundness test CE1) and we concur with the Council’s Initial Report for Consultation which concludes:

“it is noted that this site is brownfield land and within a sustainable location. It is considered that the proposal accords with the strategy of the plan and will therefore be allocated within the LDP as a housing proposal.”

We re-emphasis the key benefits of this Site as a housing allocation (in accordance with paragraph 9.2.9 of PPW):

a) It makes best use of a previously developed site and therefore offers a key urban regeneration opportunity.

b) The Site has no incompatible neighbouring uses which may make the Site’s development for housing unsuitable.

c) The Site is sustainably located, within walking distance of local facilities which include shops, a community hall, a primary school and a number of bus stops. This location will help to reduce carbon emissions and will help to sustain local services and facilities.

d) To our client’s knowledge, there are no infrastructure capacity issues on the Site and therefore the Site may be appropriately redeveloped for housing.

e) The Site is not subject to any physical or environmental constraints relating to e.g. flooding, contamination, land stability issues etc, which may make the redevelopment of the Site for residential uses unsuitable.

In addition to the provisions set out in paragraph 9.2.9 of PPW, we confirm that although part of the Site was utilised for printing newspapers this use ended some 4 years ago and the on-site buildings have remained derelict ever since. As part of the Site’s wider redevelopment the remaining South Wales Argus offices will continue to operate from the adjacent Site and some of the income raised by the redevelopment is earmarked to help fund the refurbishment of the neighbouring South Wales Argus office. This will therefore result in the retention and improvement of this existing employment use.

The Employment Land Review (ELR) which informs the Revised LDP identifies an abundance of employment land in Newport and the former South Wales Argus Site has failed to come forward for alternative employment uses since operations ceased over 4 years ago and therefore the Site is entirely appropriate as a housing allocation. Its development will also offer the opportunity to co-locate both housing and employment within a close proximity, which will help foster long-term sustainable travel-to-work patterns.

Estimated Affordable Housing

Policy H1 (30) estimates that 24 affordable housing units will be provided by the former South Wales Argus Site. Whilst we recognise this is an ‘estimate’ (calculated on the basis of 30% of 80 dwellings), we emphasise the need for the affordable housing level to be considered in light of viability considerations. This approach is consistent with LDP Policy H4 (Affordable Housing) and accords with soundness test CE4 which requires Plan’s to be reasonably flexible to deal with changing circumstances.

Site Delivery

Our client supports the reference made in Policy H1 (30) which confirms the former South Wales Argus Site is expected to be delivered within the LDP plan period (i.e. by 2026). We can confirm that it is our client’s intention to submit a full planning application on the Site very shortly and then, pending approval, our client aims to commence development very soon after that. The Site is intended to be developed in one single phase and is anticipated to be delivered in its entirety prior to April 2016. On this basis we request that the ‘Implementation and Delivery’ section of the LDP (see page 136) is
amended to reflect our client’s build programme.

Required Change:
The heading stating “affordable housing units estimated” in Policy H1 (30) should be qualified via a footnote, which forms part of this Policy. This footnote should cross refer to the provisions within Policy H4, in particular the need for provision to be set to reflect site viability. This approach minimises any ambiguity and will ensure the Plan’s policies are consistent with one another (in accordance with CE2). This additional reference will also ensure the Plan means soundness test CE4 which requires the Plan to be reasonably flexible. The Plan’s ‘Delivery and Implementation Plan’ to be amended so the Site is shown to be delivered during the first phase of the Plan (2011-2016). This reflects our client’s build programme and will ensure that the Plan is realistic (soundness test CE2).

13  Council Response

Support noted. The Delivery and Implementation elements of the Revised LDP reflect the anticipated build rate as of 1st October 2012. The H1 table only indicates an estimated total of affordable housing units based on the implementation of Policy H4. Therefore it is not appropriate to alter this as the Plan sets out a policy requirement of 30% which is reflected here. Any amendments through viability work can be implemented but the plan must commit to a strong starting point to achieve the greatest level of affordable housing provision as possible.
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Document: Revised LDP, p. 70  
Policy: H04  
Summary: Amendments proposed to be made to current draft Affordable Housing SPG should be published prior to LDP examination
Emerging Policy H4 still seeks to achieve 30% affordable dwellings on residential development of 10 or more dwellings or of 0.33 hectares in the urban area; however the Policy now includes a reference at the end which states “provision will be set to reflect site viability”.

This new insertion on viability within the policy is supported and better reflects the viability evidence which sits behind the Plan.

Consideration of viability on a site-by-site basis is essential to ensure housing is not unduly stifled. This approach is important particularly in light of the LDP’s allocation strategy which focuses on reusing brownfield land and also recognising the impacts from the recent economic recession. It accords with the requirements of Soundness Test CE4, which requires Plans to be reasonably flexible to enable it to deal with changing circumstances.

Our client welcomes paragraph 5.14, which provides some additional information on the details of the affordable housing policy and references a forthcoming ‘Affordable Housing Supplementary Planning Guidance’, however clarity on how the Council intends to consider viability issues should be set out now, not left to a forthcoming SPG. This will provide the necessary clarity on how this Policy is intended to be implemented (in accordance with Soundness Test CE3). Section 14 of the Revised LDP states that work on the Affordable Housing SPG is to be undertaken between 2014-2016, although it not clear whether this will be undertaken prior to the Plan’s Examination or not. Whilst we are aware the Inspector will not be considering SPGs as part of the LDP Examination, completion of this SPG prior to the Examination would be useful to help understand how this Policy is intended to be implemented.

Policy H4 evidence-base

The Viability Assessment and Affordable Housing Background Paper form key elements of the evidence-base which sits behind Policy H4. We set our client’s key comments on this evidence-base below:

• The Viability Report recommends a differential affordable housing percentage to be adopted in different areas of Newport (see page 13). However the LDP does not appear to have adopted this approach. Policy H4 appears to be seeking to apply a uniform affordable housing percentage. This approach seems at odds with the evidence-base and therefore we question the Plan’s consistency with its evidence (in accordance with Soundness Test CE2).

• The Viability Report states that viability should ultimately be considered on a site-by-site basis (see page 14). We support the principle of this approach and therefore the inclusion of a reference to this effect within Policy H4.

• The Viability Report was based upon a notional one hectare site and applies a set of fixed assumptions relating to Section 106 costs, market values, dwelling densities, build costs (according to current Building Cost Information Service BCIS) etc. However the Viability Report does not appear to have considered the potential viability impacts of abnormal costs. The example in the Appendix the Viability Report does incorporate any ‘exceptional development costs’. This highlights the limitations of this type of analysis, and re-emphasises the importance that viability be considered on a site-by-site basis, as costs can vary significantly between different locations.

• This large variation in costs between locations is particularly apparent in relation to market values. For example, the Viability Report is based upon average values within the Newport West area, which vary between £81,000 (for 1 bed flats) to £270,000 (for 5 bed detached) – this equates to an average of £159,642. The Newport West area includes 5 post-code areas including NP20 3 (Gaer and Glasllwch). Conversely, figure 3 of the Local Housing Market Assessment (which is included within the Council’s Background Paper on Affordable Housing), calculates an average house price of £126,975 within the Gaer ward. This is a significant variance and reflects the wide range of dwelling values just within the Newport West area. This serves to further illustrate the limitations of the Viability Report methodology and therefore the acute need to consider viability issues on a site-by-site basis, which needs to be recognised in the LDP.
Representation Details

by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M

Rep’n/Para/Policy  Representor  Agent  Accession No  Date Lodged  Late?  Source  Type  Mode  Status  Status Modified

Representations Details

Required Change:
The amendments proposed to be made to the current draft Affordable Housing SPG (2004) should be published prior to the LDP Examination in order to enable the Inspector, developers and members of the public to understand how the Council intends to apply LDP Policy H4 in practice. This approach accords with soundness test CE3.

Emphasis required with in the LDP to assess viability on a site-by-site basis.

Item Question  Council Responses

13  
Council Response

Support noted.

The detail of how the Policy will be implemented will be set out in the Supplementary Planning Guidance. It is considered that the level of detail required would be too excessive to be written in the plan. This Supplementary Planning Guidance is a high priority and the Council will aim to adopt this guidance as soon as possible after the adoption of the plan.

The affordable housing background paper sets out the reasoning behind the use of the ‘blanket’ 30% policy.
The justification is that there are only 9 housing proposals as well as windfall sites available for negotiations to affordable housing. The table in section 4 outlines that it is the implementation of the blanket policy that results in the greatest level of provision to meet the Local Housing Market Assessment identified need of 86%. Therefore a reduced target i.e. 10% or 0% under the split approach would not do enough to assist in meeting what is a ministerial priority.

It is clear that residual values are routinely likely to be lower in some locations than others. Whether this leads to a differential policy approach will depend on local choice and circumstances. A single target approach has been accepted extensively across local authorities where it can be shown that numbers are tighter in low value areas.

There is a danger that on housing market improvement some areas see faster price increases than others. Where this happens it may be prudent to monitor around a single target than to have split targets which may be insensitive to change.

The response here is similar to that to HBF (136.L4). The Council accepts that some sites will be more heavily burdened with abnormals than others. As previously noted in the response to the HBF representation, it has been agreed across Wales and England that the correct approach to base policy on normal situations and negotiate where prices are higher (lower) than average and costs are higher (lower) than average.

Each application received which requires an element of affordable housing is tested against the site’s viability, this ensures that the maximum provision is being achieved whilst taking into account the sensitivities associated with wider housing delivery.
Policy EM4 relates to alternative uses of employment land.

As previously set at Deposit Plan stage - whilst we acknowledge that part of the former South Wales Argus Site was utilised for printing newspapers, the printing of newspapers on-site ceased some 4 years ago and these buildings have remained derelict ever since. Despite this element of the business ceasing to be undertaken on-site, the South Wales Argus offices will continue to operate from the adjacent site, with the remainder of the site being redeveloped for housing. In fact, some of the money raised by the redevelopment of the wider site is earmarked to help fund the refurbishment of the neighbouring South Wales Argus office and will therefore result in a benefit to this existing employment use.

In line with this, our client still considers an amendment should be made to Policy EM3 [this should read 'EM4'] so it explicitly considers any wider benefits which may be captured from permitting an alternative use on an employment site e.g. in the case of our client’s site enhancement and refurbishment of an existing employment premises and regeneration of a derelict urban site. This amendment better reflects the wider policy considerations and policy balances which need to be considered when considering alternative uses.

Required Change:
Insertion of an additional criterion which considers the wider benefit yielded as a result of permitting an alternative use on part of a site. Amendment to criteria i) to include reference to (direct and indirect) employment level.
### Representation Details

**Document:** Revised LDP, p.65  
**Policy:** H01  
**Summary:** Allocate land at Croes Farm, Marshfield for residential development.

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**Representation Details**

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Additional material submitted - Please click here
On behalf of my clients, Mr and Mrs J Harris, the owners of the land shown in the attached plan, I wish to point out that the Revised LDP is unsound and needs to be changed. You will be aware that Croes Farm is itself subject of any application for residential redevelopment by Waterstone Homes, who also have an interest in this land.

The first of the Assembly Governments objectives for housing is:-
"to provide more housing of the right type and offer more choice."
As openly indicated in the Plan the supply of housing land is focussed on brownfield sites and includes many of the sites that were included in the previous UDP. Indeed, several of the sites have had permissions for many years and seem no nearer to development now. Such a strategy is flawed because it provides insufficient choice, range and variety of sites with flexibility to deal with changing circumstances.

While the Assembly Government encourages housing development on mainly brownfield sites within urban areas, it does not require housing allocations to be almost exclusively on such sites, accepting that some greenfield development is necessary to provide a balance of development opportunities reflecting choice, range and variety. The Revised Deposit Plan provides for it housing sites to be concentrated within the urban boundaries of the City with few opportunities beyond the City Boundaries. In particular there are no new allocations in Marshfield/Castleton. In fact, the village boundary has been drawn even tighter to exclude land which would have been available for minor development in the UDP.

The Welsh Assembly Government emphasises the need to make up the shortfall in affordable housing provision. The dependence on brownfield sites, where development costs are higher is in danger of not producing the required affordable housing provision because of the threat to the viability. The last published Joint Land Availability Study shows the City to have land available to provide a 7.0 year land supply available but only based upon completion rates over the past 10 years of development. The build rates were constrained by insufficient range of sites available for immediate development, and the economic climate generally.

The Study showed that only 26% of the dwelling units available were likely to be built in the first 5 years whereas over 74% would not become available until after the first 5 years. The Statement just a few days ago by the Minister for Housing and Regeneration set out a number of steps to stimulate house building in Wales and the focus is early bringing forward of sites. National Government requires a 5 year supply of available housing land and where there is a shortfall, the local planning authority is required to address it. This Revised Deposit Plan does little to address the short-term availability of land, nor does it address the requirement for a choice, range and variety of sites with flexibility to deal with changes in circumstances.

The Plan would be made more sound with a modest allocation of greenfield sites which would address the above mentioned deficiencies. One such allocation would be that identified in the attached plan at Marshfield. The villages of Marshfield/Castleton are situated between Newport and Cardiff where there is a high demand for new housing. This has been obvious with the take up of new housing over the past 2 decades. The villages have a reasonable local infrastructure which itself needs to be sustained. In addition there are reasonable public transport links with Newport and Cardiff.

National Government suggests a vigorous housebuilding industry is needed to kick-start a lethargic economy and initiatives have been commenced to encourage the Planning Process to allow faster lead-in time to development. The Revised Deposit Plan proposals do little to provide a range of housing sites offering variety, quality and choice in the short-term. This site in Marshfield is modest in scale and ideally located in relation to some of the more recent village development, its amenities and services. It would form a natural rounding off for housing purposes.

To justify the allocation of this greenfield site and why the Council should increase the range of choice of sites rather than depend on urban regeneration.

Item Question | Soundness of LDP | Tick-box reply | No
Justification of Requirement

Following representations at the Deposit LDP stage the housing requirement figure has been justified and increased from the proposed Welsh Government Population projections. There is scope for an authority to deviate from the WG population projections but this deviation is required to be well evidenced. The NLP assessment sets out this evidence base and illustrates that Newport, as one of the few areas in Wales with an anticipated population increase noted in the Census, is set to grow and reflects the Council’s policy aspiration for growth. It should be recognised that the majority of the sites (46 of 55) have planning permission or permission subject to a Section 106 agreement. This established supply with clear market intent illustrates not only that a growth strategy is appropriate but achievable.

As noted above, the Plan identifies its housing requirement for the plan period based on an assessment of need and this is also true of its employment land requirements. The clear strategy for the Plan is for growth and it will be through the successful implementation of the policies of the Plan that this will be achieved. There is a clear link between housing supply and economic growth which is why the supply will be monitored annually.

Reliance on previous Development Plan sites

The Local Development Plan does have a number of housing sites which were identified within the Unitary Development Plan. In total there are 15 of the 55 housing sites which continue into the new plan. The majority of these sites have progressed significantly from the UDP, as noted below:

1. Land adj. McReadys. As of 1st April 2013 the developer is on site preparing the site for development.
2. Eastern Expansion Area. Planning permission has been granted with a signed Section 106 agreement. Gallagher Estates have confirmed through the JHLAS process that they will be delivering units on site in 2015.
3. Glebelands. This site has an extant planning permission associated with the school site adj to the residential area. The land has recently been sold to a developer.
4. Monmouthshire Bank Sidings. Redrow are on site and progressing.
5. Traston Lane. The site has planning permission and the agent has confirmed that they anticipate development on the site in 2015.
6. Pirelli. This site has been sold to the Seren Group (RSL) who launched the development in September 2013.
7. Ty Du Works. An application is being considered by the Council for a new scheme on the site.
8. Farmwood Close. This is an historic site with a LDC for the implementation of 10 units which have not been completed. The land is currently being marketed.
9. City Vision. The developer is on site and progressing.
10. Trinity View. The developer is on site and progressing.
11. Glan Llyn. The developer is on site and progressing. A third developer (St Modwen) are anticipating to begin work on Phase 2 in 2015.
12. Mill Street. The site is owned by NCC who will market the site.
13. Herbert Road. This site is adjacent to the Glebelands site noted above. The site is compliant with the overall strategy of the LDP being a brownfield urban site in need of regeneration. There is no application on the site but the area land owner notes their intention to sell the site for development.
14. Whitehead Works. This site is part of a Welsh Government regeneration scheme, which anticipates delivery to begin in 2016.
15. Bideford Road. This site is compliant with the overall strategy of the LDP being a brownfield urban site with potential for regeneration. There is no application on the site but the area is the remaining part of a housing estate development.

The information above clearly shows that although there are a number of sites which have continued from one development plan to the other they have in the main progressed significantly or that they will be delivered within the plan period. It is also important to note that it was made clear through the UDP process that the growth proposed in the east of the city (i.e. Glan Llyn and Llanwern Village) was not anticipated to be delivered wholly within the UDP plan period.

Affordable Housing

It is recognised that the required level of affordable housing for Newport cannot be met by the Plan alone. The level of supply which can be achieved through the implementation of the affordable housing policy in addition to those units already secured through the planning process has been clearly set out. It is not the sole responsibility of the planning system to meet the affordable housing requirement however the Plan does set a policy framework in order to achieve the highest level of affordable housing provision possible. Such provision has taken into account the viability of the policy threshold for affordable housing yet remains flexible to ensure that viability can be considered so that the housing market is not stifled by a non-negotiable approach to affordable housing provision.

Over reliance on previously developed sites
Planning Policy Wales sets out the overarching requirement for development to be placed on brownfield sites in preference to greenfield sites. The plan allocates 82% housing units on brownfield sites with the remaining 18% of units on greenfield sites (these calculations excludes the completions, windfall and small sites supply figures). The LDP is therefore compliant with Planning Policy Wales in terms that it has followed the search sequence criteria starting with the re-use of previously developed land and buildings within settlements which are located in areas accessible to jobs and services, where there is existing infrastructure and the scope to build sustainable communities.

Sites beyond the settlement boundary
As part of the development of the LDP sites were suggested for inclusion across Newport. Those applications have been assessed individually and the result of this assessment can be viewed in the Alternative Sites Assessment Report 2013. In addition to this work a review of boundaries, including Langstone, was undertaken the full details of which can be viewed in the Settlement boundary methodology background paper 2013.

Housing Land Supply
Based on a housing supply of 11,622 units over the LDP plan period the Council anticipate the following delivery rate:

- Completions to date (Oct 2012) = 5%
- Remaining completions between 2011-2015 = 25%
- Completions between 2016 – 2020 = 38%
- Completions between 2021 – 2026 = 19%
- Remaining 13% left to small site and windfall completions.

The plan sets out the anticipated rate of delivery in Chapter 13 which illustrates that the total number of units is set to be delivered across the plan period. This in turn is established yearly through the Joint Housing Land Availability Study and monitored annually within the AMR. The effects of the economic recessions are still being felt within the housing market so it is therefore of no surprise that the plan anticipates a lower growth in the first period of the plan compared to the final ten years.

It is considered by the Council that the Plan provides enough land that is both deliverable and viable which ensures a 5 year supply is met and, that although the annual build rate is higher than currently achieved, even when taking into account the residual method of calculation there is an adequate supply of land which has been agreed with the industry through the JHLAS process. Many of the sites have progressed since the Revised Deposit Plan was written and deliver rates will need to be taken from the most up to date JHLAS study process.

The annual monitoring process will consider the implementation of the policies within the Plan, including the delivery of housing allocations, including the overprovision of housing. The Plan sets out a supply based on a robust evidence base which reflects the key strategy for Newport of regeneration on brownfield sites. This prioritisation of the sustainable use of land will be undermined with the increased allocation of greenfield sites.

The site is positioned in the Zone C1 of the DAM plans. Allocation of this Greenfield site for residential development without meeting the required justification tests would be contrary to TAN 15.

In addition, the plan seeks to promote the reuse of Brownfield sites in preference to extensive use of Greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities.

The forecast housing need has been assessed in the context of population and employment projections and current market realities. The plan allocates sufficient land to meet this requirement. Additional housing allocations in a rural location cannot therefore be justified. Furthermore, the release of the representation site for housing would be contrary to the Council’s strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

It is recommended that this site at Croes Farm is not included in the Local Development Plan for residential purposes.
## Representation Details

**Document**: Revised LDP, p.22, para.2.25  
**Policy**: SP07  
**Map**: Proposals West: Proposals Plan - West  
**Summary**: Delete Green Wedge allocation and amend Environmental Space allocation

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**Morgan, Mr & Mrs P**  
**Agent**: Derek Prosser Associates  
**Accession No**: 3208.L1/2.25/SP07  
**Date Lodged**: 22/07/2013  
**Late?**: P  
**Source**: O  
**Type**: M  
**Mode**: O  
**Status**: M  
**Status Modified**: Yes

Additional material submitted - Please click here

**Item Question**  
**Tick-box reply**

**Soundness of LDP**  
**No**

12/02/2014
No change. The area of Green Wedge is located to the north of Bettws and Malpas on the boundary with Torfaen County Borough Council. The area is characterised by undulating hills and woodland.

The Green Wedge allocation sits adjacent a Green Wedge allocation in the neighbouring authority.

In relation to the appropriateness of the site for inclusion in the Green Wedge allocation it is considered that the area is in accordance with the purpose of Green Wedge as set out in Planning Policy Wales. The area of land does serve to prevent the coalescence of two settlements (Malpas, Bettws and Cwmbran), and assists in safeguarding the countryside from encroachment.

It is considered that the allocation of this area is in accordance with Planning Policy Wales in that normal planning and development management policies cannot provide the necessary protection (a countryside designation would not have the same level of control over certain types of development for example extensions to houses). It is considered that only land that is strictly necessary to fulfil the purposes of the policy has been provided in the designation based on the purpose of Green Wedge as identified in PPW. In this instance the openness of the land is considered important.

Piecemeal removal of parts of the Green Wedge within the boundary of Newport would serve to undermine the intention of the various Green Wedge designations in the area.
The Plan should be amended by the deletion of the area shown on the attached plan, from the proposed Green Wedge and, that part which is designated as Environmental Space should not be so designated.

The purpose of Green Wedges is to prevent the coalescence of settlements, to control the expansion of urban areas and to safeguard the countryside from encroachment. This particular area of the proposed Green Wedge has very limited width and a tenuous width of link with the wider Green Wedge north of Bettws, because of its proximity to the administrative boundary of Torfaen CBC. Immediately north of the boundary are the extensive grounds of Rougemont School which, despite being within Torfaen’s own Green Wedge (Green Space), has been allowed to expand with major developments during the past decade. The School’s location in this position is clearly because of its proximity to the built up area of Malpas and the (Torfaen) Council’s decision to allow its major expansion will just as clearly be because of its perception as part of Newport’s built-up area. It is certainly not because it is an open green area which separates Newport from Cwmbran.

Additionally, the site is not an open area and its modest development with a few houses would not threaten the coalescence of Newport and Cwmbran because it already has development at its frontage to Malpas Road, echoing residential development on the other side of Malpas Road, and immediately to its north, also fronting Malpas Road, is the substantial urban development of Rougement School.

It is noticeable that the extensive open school grounds to the adjoining School to the south of the Sneyd Park land and having an open frontage to Malpas Road, are not included in the Green Wedge. If the designation is to have any credibility and consistency, it should either include the school playing fields or it should exclude the Sneyd Park land referred to in the plan attached. For the reasons expressed above, the Sneyd Park land should be excluded from the designation.

The land designated as an Environmental Space is not appropriate for inclusion as such a designation. In paragraph 4.7 of the Written Statement, the Council suggests that Environmental Spaces provide a network of connected accessible, multi-functional sites that can bring about multiple social, health, economic and environmental benefits to the area. This is an isolated designation, it is not connected or accessible, nor is it multi-function from the point of view that it is privately owned land to the rear of a number of private houses. If it has environmental and ecological value, this can be retained through normal development control processes.
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C2, CE1 and CE2.
Summary
Policy H1 should be amended to include a new residential allocation site at Bettws Hill, Bettws (site plan enclosed), in order to ensure that there is an adequate supply of land to enable delivery of the housing requirements set out in Policy SP10 in order to ensure that there is adequate choice of housing within the Bettws/Malpas area of the City.

Rationale for Proposed Change
We note that in Policy H1 a total housing provision of 11,622 is proposed against a requirement of 10,350 set out in SP10. It is therefore suggested that this provision creates a housing ‘oversupply’ of 12% beyond the identified requirement. We consider that two points are worthy of note in respect of the provision figures when compared against the proposed housing provision in the previous Deposit Plan:
1. The proposed housing provision of 10,350 over the Plan period is higher than the previous proposed provision figure of 8,750. We support this increase in requirement.
2. Housing yield figures for the main categories of the supply to meet that requirement are lower in most instances than the figures given in the previous Deposit Plan.

Regarding point 2, the key differences are shown in the table below.

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The difference in the figures as presented in the two documents is the introduction, in the revised Deposit Draft plan, of completions (563), windfall sites above 10 units (1013) and small sites below 10 units (513).

In our view, while it is appropriate to include completions, to date from the start date of the Plan period, it is not appropriate to include an allowance either for small sites or windfall sites of more than 10 units, due to the inherent unpredictability and uncertainty associated with the delivery of such housing over the Plan period.

Subtracting those elements of the provision leaves a housing provision of 10,096, some 254 units below the identified Plan requirement. A more 'sound' approach to meeting the requirement (including the 10% reserve margin) would be to allocate additional housing land, on the basis that this land is likely to come forward within the plan period.

We also consider that there is too much reliance within the Deposit Draft LDP on brownfield sites to deliver the required levels of housing over the Plan period set out in Policy SP10. We estimate that some 75% of the land identified as existing commitments, existing commitments subject to Section 106 agreement, land under construction and allocations under Policy H1 can be classed as brownfield land. We consider that the timing of delivery of many sites within Policy H1 is uncertain because a substantial proportion of the brownfield land supply in Newport is constrained and is relatively expensive to develop compared to greenfield land. The inhibiting effects of various brownfield land constraints have been exacerbated by current economic recession which has had a significant adverse impact on the availability of investment finance (secured from either private or public sectors) to enable site development.

A heavy reliance on brownfield land development within Policy H1 will, in our view, continue to make it difficult for the LDP to fulfil the requirement of paragraph 9.2.3 of Planning Policy Wales which states that "Local planning authorities must ensure that sufficient land is genuinely available or will become available to provide a 5-year supply of land for housing, judged against general objectives and the scale and location of development provided for in the development plan.”

In addition, we consider that within the LDP there is undue focus on providing for housing requirements on land within Newport to the south of the M4. The sustainable growth of settlements north of the M4 will be restricted by lack of readily available sites for new housing. In that respect, the LDP fails to take into account paragraph 9.2.5 of Planning Policy Wales, which states that "In producing their development plans local planning authorities should devise a settlement strategy which establishes housing policies in line with their local housing strategy and spatial pattern of housing development balancing social, economic and environmental needs.”

The approach of the LPA in meeting housing requirements appears to be driven primarily by the availability of brownfield sites, rather than any reasoned strategy of meeting localised housing needs within the whole of the City and within its constituent parts. In that respect we note that there are only two sites proposed for housing in Bettws and Malpas, sites H1 (39) and H1 (46). In total they are likely to yield a maximum of 253 houses. Both of the sites are brownfield.

The allocation of the site at Bettws Hill, which is a greenfield location, will enable housing needs to be met locally on a site that is readily available and with no overriding constraints. The site relates well...
to existing and new housing developments. It is sustainable (i.e. it is close to local amenities such as shops and schools), accessible by a choice of modes of transport and is capable of making it positive contribution to the environment through the dedication of an attractive and ecologically rich woodland to an appropriate management body to preserve and enhance its environmental and conservation importance.

A full sustainability appraisal, identical in scope and level of detail to those conducted by the Authority, has been carried out on the proposed residential allocation site and that assessment is attached in the form of a completed Candidate Sites form and OS based site plan showing the Candidate Site in red and adjoining land in the same ownership edged in blue.

We conclude that the land in question has the capacity to accommodate around 90 units and we therefore seek that the following amendment to the Plan. (see hyperlink for Revised housing Table.)

<table>
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<td>2.2 Soundness of LDP</td>
<td>No</td>
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</table>

Housing allocations; reliance on brownfield sites and insufficient land allocated in Bettws. The constraints associated with various proposed allocations and housing commitments may need to be addressed in detail.
Support of growth strategy noted.

Windfall Allowance
In addition to a perceived under supply within the Plan the representation also alleges an over reliance on windfall sites. Planning Policy Wales notes that ‘flexibility will be needed in respect of the emergence of unidentified sites, i.e. sites not allocated in the LDP for the particular type of development and generally referred to as windfall sites, para 2.5.2’. The rate of windfall sites is based on a review of the past trend of windfall supply which has been drastically cut to reflect the need for the Plan to remain flexible whilst concentrating growth on allocated housing sites and tight settlement boundaries. The plan will be monitored as to the percentage of houses developed on allocated housing sites to ensure that the housing policies of the plan are being effectively implemented.

Over Reliance on Brownfield Sites
Planning Policy Wales sets out the overarching requirement for development to be placed on brownfield sites in preference to greenfield sites. The plan allocates 82% housing units on brownfield sites with the remaining 18% of units on greenfield sites (these calculations exclude the completions, windfall and small sites supply figures). The LDP is therefore compliant with Planning Policy Wales in terms that it has followed the search sequence criteria starting with the re-use of previously developed land and buildings within settlements which are located in areas accessible to jobs and services, where there is existing infrastructure and the scope to build sustainable communities.

Range and Choice
The supply of housing is considered to provide for a clear range and choice of housing which is a clear concern for many representors. The housing sites within the Plan are located across the City, with a clear focus on regeneration in the east as per the established strategy. The Plan provides a supply of affordable units for a mixture of needs as well as providing a mix of family homes and inner city living to cater for the broad housing market. The opportunity to provide homes in more rural locations has been investigated and there was no clear evidence to justify expansion to existing settlements. No evidence has also been provided to support the representation that a site is required to bridge the division between Newport and Monmouth. Assessments of housing need take into account cross boundary issues. The Plan therefore has provided the opportunity for exception sites where such justification can be produced. It is considered that the plan provides a more than adequate supply of housing, both market and affordable, which is both deliverable and viable.

It is therefore considered that the LDP provides a balanced housing supply, concentrating on the continued sustainable use of previously developed land.

The site is located adjacent to the settlement boundary within Countryside designation.

The plan seeks to promote the reuse of Brownfield sites in preference to extensive use of Greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities.

The forecast housing need has been assessed in the context of population and employment projections and current market realities. The plan allocates sufficient land to meet this requirement. Additional housing allocations in a rural location cannot therefore be justified. Furthermore, the release of the representation site for housing would be contrary to the Council’s strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

The site at Bettws Hill does not reflect the underlying brownfield strategy for the plan and it is therefore recommended that this site is not included in the Local Development Plan for residential purposes.

12/02/2014
### Representation Details

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**Document:** Revised LDP, p.81

**Policy:** EM02

**Map:** Proposals West: Proposals Plan - West

**Summary:** Want Housing site H32 (former Sainsbury's site) allocated as EM2 regeneration.

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**Item Question** | **Representation Text**
---|---
3 3 | New Policy
4 4 | A new paragraph or new text
8 8 | Candidate Site Name
9 9 | Existing Sainsbury's
56 | Candidate Site Reference
10 10 | Soundness Test
CE2, CE4 |
11 11 | Representation

We note that the deposit LDP formally allocates 'the existing Sainsburys' as a housing allocation under Policy H1 (LDP Ref H32). Whilst we welcome the formal recognition in the Deposit LDP of the significant redevelopment opportunity presented by the existing Sainsburys site, we do not consider that this housing allocation is the most appropriate manner in which to treat the site. As such, we therefore object to the LDP in its present state. We detail below the reason for this objection, together with our suggested approach to rectifying this issue so that the plan can be considered to be sound.

We consider that the housing allocation (Ref H32) does not take full account of the present (and likely future) planning status of this important site. As your Authority will be aware, there is a current resolution to grant outline planning permission (App Ref 09/0733) for the mixed use redevelopment of this site.

This resolution to grant planning permission is subject to the completion of a Section 106 agreement. We, at GVA, are currently at an advanced stage in negotiating the S106 legal agreement with Newport City Council on behalf of the current landowners. It is therefore expected that formal planning permission for the mixed use redevelopment of the site will be secured in the near future.

In light of this situation, we consider that the LDP should be amended to reflect the site's mixed use development potential, as opposed to its current treatment solely as a housing site. We therefore suggest that the site should be treated as an 'urban regeneration' site under policy EM2 of the LDP, as opposed to being allocated solely for housing under Policy H1. Such an amendment would more accurately reflect the current planning situation associated with the site and provide the required flexibility in order to facilitate the redevelopment of this site over the LDP period. At present there is a risk that any proposed uses, apart from residential, could potentially fall foul of the policy context that seeks to ensure residential development only at the site. We are sure that this is not the intention of the plan and that this oversight can be simply dealt with by the reallocation of the site from housing to urban regeneration.

We therefore request that the site be allocated under Policy EM2, with supporting text as follows:

**Existing Sainsburys**

This area of land has a resolution to grant planning permission for mixed use, residential led development. It is expected that the site will deliver mixed use redevelopment over the LDP plan period and such development will be encouraged.

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**Speaking at Public Examination** | **No**
---|---

12/02/2014
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<th>Council Responses</th>
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The Former Sainsburys site has permission subject to signing a Section 106 agreement for a residential led mixed development. It is acknowledged that a hotel will be a small part of this site, however, the sites within policy EM2 all have more significant employment B-use land. It is considered that the site should remain within the H1 Policy.
### Representation Details

**Rep'n/Para/Policy** | **Representor** | **Agent** | **Accession No** | **Date Lodged** | **Late?** | **Source** | **Type** | **Mode** | **Status** | **Status Modified**
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3213.L1/EM03 | K & W Development Ltd | Mango Planning & Development | 05/08/2013 | E | O | I | M

**Document:** Revised LDP, p.83  
**Policy:** EM03  
**Summary:** To allocate West Way Rd site for bulky good retail

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| 10 | Soundness Test  
CE1, CE2, and CE4 |
| 11 | Representation  
Part of the site is proposed to be allocated for employment uses within the Revised Deposit LDP. The site also now benefits from an existing planning permission for mixed-use redevelopment, which proposes uses that go beyond B1/B2/B8 and extend to Sui Generis/Pseudo retail (07/0508). By granting this permission, the LPA has acknowledged that the site is suitable and capable of accommodating uses other than B1/B2/B8. As such, the continued allocation of the site for employment use is inappropriate given its recent history and there is very little prospect of the site being brought forward for employment use in any case. There is also an acknowledged need for further bulky goods retail in Newport within the development plan period. By allocating this site for bulky goods retail, the LPA will maximise potential for a key vacant brownfield site to be brought in to beneficial use. The site is uniquely placed to fulfil a complimentary role to the existing 28 East Retail Park and other surrounding retail uses. Indeed, the proposed bulky goods use represents an extension to the existing retail uses in the area, such that would warrant the overall area being recognised as a District Centre. On the basis of the above, my client respectfully requests that this site be allocated for bulky goods retail use in the LDP and that the site, together with the 28 East Retail Park be allocated as a District Centre. |

| 12 | Speaking at Public Examination | Yes |

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**Item Question** | **Tick-box reply** |
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**Item Question** | **Council Responses** |
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<td>13</td>
<td>Council Response</td>
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### Document: Revised LDP, p.83

#### Policy: EM03

**Summary:** To allocate West Way as a District Centre

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#### Item Question  Council Responses

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<td>Council Response</td>
<td>It is considered that the suggestion to allocate Land at West Way as a District Centre would not be appropriate. The Retail Study carried out for the Council and Newport Unlimited in 2010 by Colliers International does not recommend any additional District Centres. It is also considered that the allocation of this site for bulky goods and as a District Centre would deviate from TAN 4 guidance and undermine the objective of regenerating the City Centre.</td>
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### Representation Details

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**Filtered to show:** (all of) Stage=L; Status=M

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**Document:** Revised LDP, p.83  
**Policy:** EM03  
**Summary:** Allocate 28 East Retail Park as a District Centre

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| 11   | Representation | See rep 3213 - L1 for full text  
| 12   | Speaking at Public Examination | Yes |

**Council Responses**

13  
Council Response

It is considered that the suggestion to allocate Land at West Way as a District Centre would not be appropriate. The Retail Study carried out for the Council and Newport Unlimited in 2010 by Colliers International does not recommend any additional District Centres. It is also considered that the allocation of this site for bulky goods and as a District Centre would deviate from TAN 4 guidance and undermine the objective of regenerating the City Centre.
REPRESENTATIONS TO REVISED DEPOSIT LOCAL DEVELOPMENT PLAN CONSULTATION LAND TO THE REAR OF 15 RIDGEWAY, NEWPORT

I am instructed by the landowner of an area of land to the rear of 15 Ridgeway, Newport, edged red on the attached plan, to submit representations and details of the site to the current Revised Deposit Local Development Plan consultation as a potential future residential development site. The site has an area of approximately 1.8 hectares (4.3 acres).

Representations were also made to the Deposit Local Development Plan consultation in May 2013, however we note from your website that comments made in relation to this previous consultation will not automatically be sent to the Inspector.

In relation to the proposed policies within the Revised Deposit Local Development Plan we consider that the wording of the relevant housing policies (i.e. SP10) should be revised to allow for the development of suitable, sustainably located sites for residential development where it is adjacent to, and well related to the settlement and existing development. Additional housing development could be accommodated on appropriate Greenfield areas around the City in order to help deliver the required amount of growth, both within this Local Plan period and going forward into the next, which would contribute towards meeting Local Plan ‘Objective 4’.

My clients land is “Greenfield” but is located immediately adjacent to the settlement boundary and has good links with the wider urban area. The site is very well located in relation to the settlement and is well connected being within a reasonable walking/cycling distance from existing local facilities and employment opportunities. There are bus stops along Ridgeway providing regular services to the City Centre and railway station. The site is also readily accessible to the M4 motorway to the west via the B4591. This is therefore a highly sustainable location.

Additionally, we are not aware of any site specific, technical or infrastructure constraints that would inhibit or unduly constrain development. Furthermore there are no landscape designations or safeguards on the site.

The surrounding area is predominantly residential in character, with various local facilities including a primary school and convenience shops in close proximity. Residential development would therefore be appropriate in this location.

Although being located outside of the development boundary there is other development in the surrounding vicinity including a riding school directly to the north west of the site. The M4 motorway provides containment to growth along this north western edge of the City and it is therefore considered that this location would be a suitable area for future expansion of the urban area.

The settlement boundary should be reviewed with a view to amending it in this location in the long term to include this area and allow for its development in the future.

My client would like to promote this land for residential development in the period to 2026 and beyond and would appreciate an acknowledgment of this letter and acknowledgement that the land will be noted as available and suitable in any upcoming Call for Sites / SHLAA process and as a formal representation to the Revised Deposit Local Development Plan June 2013.

As summarised above, the land is available, well related to the settlement and to employment and community facilities. Residential development would be appropriate in this location and fit with the surrounding context. Although we acknowledge that adequate housing land has been identified to meet the LDP’s current housing requirements, we consider that this site has potential as a long term housing site should additional land be required towards the end of the current plan period or in the next plan period. We believe that the proposed policies should be revised to allow for the development of sites like this in the event that additional land is required.
The Plan sets out a policy framework which allows residential development in areas which are compliant with the overall strategy of the plan. It also gives the flexibility for developments on the edge of settlements through the implementation of the housing exceptions policy where all the relevant criteria are met. The suggested wording is not considered appropriate as the Plan sets out a clear strategy and combined with National Policy makes an allowance for local affordable residential developments to occur where exceptions can be evidenced.

The site cannot be noted as available in the Joint housing land availability Survey process (the equivalent SHLAA process in Wales) because the site does not have planning permission or is allocated within an adopted development plan as required by Technical Advice Note 1. The site will need to be resubmitted as a potential site at each stage of the LDP process.

The site would result in incursion into open countryside in a prominent semi natural woodland location in Newport.

The plan seeks to promote the reuse of brownfield sites in preference to extensive use of greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities.

The forecast housing need has been assessed in the regional context and current market realities. The plan allocates more than sufficient land to meet this requirement. Additional housing allocationsoutside of the settlement boundary cannot therefore be justified. Furthermore, the release of the representation site for housing would be contrary to the Council’s strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

It is recommended that this site at land to rear of Ridegway is not included in the Local Development Plan for development.
### Representation Details

**Document:** Revised LDP, p.65  
**Policy:** H01  
**Map:** Inset 2: Marshfield and Castleton Village Area

**Summary:** Land at Bakery Lane, Castleton should be allocated for housing.

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**Representor:** Matthews, Mr Jon  
**Agent:** Carolyn Jones Planning Services  
**Accession No:** 3220.L1//H0  
**Date Lodged:** 23/07/2013  
**Source:** E  
**Mode:** O  
**Status:** I  
**Accession No:** M  

**Additional material submitted - Please click here**  
SA/SEA submitted
Representation Details

The housing requirement detailed within the LDP has now been identified as 10350. The Plan allocates 11,622 units which allows for a 12% flexibility allowance within the allocations. The increased provision for housing numbers is welcomed. However, the on-going reliance on brownfield sites is considered questionable. Many of the sites have been "rolled forward" from allocations contained within previous UDP and previously Deposit LDP.

The strategy of reliance on brownfield allocation is flawed, in that the deliverability of many of these sites within the plan period is doubtful. In addition, it precludes the option of delivering a range and choice of housing sites for future development. The brownfield strategy should therefore be amended to include a selection of greenfield sites that can be brought forward in the shorter term.

Reliance on brownfield sites has a greater element of risk, in that, brownfield sites generally have greater constraints and higher development costs than greenfield sites. Greenfield sites are subject to further constraints and can be delivered and brought forward in the early phases of the Plan period. Brownfield sites are likely to have infrastructure, contamination and remediation issues, which are both costly and time consuming to address. Allocating a percentage of greenfield sites would ensure a more flexible strategy, and would be a more equitable approach to providing housing sites within the Plan.

In this respect, the small site at Bakery Lane, Castleton is well suited to provide a small scale, greenfield site for housing on the edge of the village, which could be developed without damaging the overall strategy of the LDP.

Evidence in Support of the proposed allocation
Castleton and Marshfield are popular residential villages to the west of Newport. Over recent years both have seen new residential development. The villages remain separate entities and coalescence has been avoided. Allocation of the subject site would not affect this.

Both Castleton and Marshfield offers a wide range of facilities within walking distance. This includes a school, shops, PFS, churches, playing fields, public right of way, village hall, pubs & post office, Public transport (bus) links are available through the village with additional services along the A48 connecting to Cardiff & Newport. Newport train station is just under 5 miles away from Castleton. The site is therefore well scored in terms of sustainability criteria.

The physical characteristics of the site ensure the site is well related to the existing settlement pattern. There is existing development on three sides. Some of the properties are very extensive residential complexes which lie outside the current settlement limits. These and the other residential properties along Bakery Lane and along Marshfield Road frame the subject site making it eminently suitable as a new residential site.

As can be seen from the attached photographs the northern boundary of the subject site is formed by a row of dense, mature, conifer trees which separate the site from the open countryside beyond. This further reinforces the suitability of the site for residential development.

The site can be easily accessed. Bakery lane is a narrow private land which allows for access to the existing properties along the lane. The owner of the subject site has however retained control over additional land within the curtilage of the Coach House & Green View to allow for the widening of Bakery Lane and to enable the required visibility splay to be created. The proposed access improvements are detailed on the enclosed Drawing No: CJP1203/04. Clearly therefore a suitable access to the required standard can be provided.

In conclusion, it is considered that the Bakery Lane site is suitable for a small scale residential development and would provide an attractive form of residential development in an area popular with prospective purchasers. The site would add to the range & choice of sites allocated within the LDP.

Suggested Changes
On the basis that the current housing strategy relies heavily on brownfield allocations, it is considered that limited greenfield allocations are appropriate. Consequently, it is proposed that the Bakery Lane site at Castleton should be allocated as a residential site under Policy H1. Subsequent amendments will be required to the environmental policies of SP5, SP7 and SP8, and to the boundaries of the Settlement within the Inset Plan and Proposals Map.
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**Item Question**  Council Responses
Justification of Requirement

Following representations at the Deposit LDP stage the housing requirement figure has been justified and increased from the proposed Welsh Government Population projections. There is scope for an authority to deviate from the WG population projections but this deviation is required to be well evidenced. The NLP assessment sets out this evidence base and illustrates that Newport, as one of the few areas in Wales with an anticipated population increase noted in the Census, is set to grow and reflects the Council’s policy aspiration for growth. It should be recognised that the majority of the sites (46 of 55) have planning permission or permission subject to a Section 106 agreement. This established supply with clear market intent illustrates not only that a growth strategy is appropriate but achievable.

As noted above, the Plan identifies its housing requirement for the plan period based on an assessment of need and this is also true of its employment land requirements. The clear strategy for the Plan is for growth and it will be through the successful implementation of the policies of the Plan that this will be achieved. There is a clear link between housing supply and economic growth which is why the supply will be monitored annually.

Reliance on previous Development Plan sites

The Local Development Plan does have a number of housing sites which were identified within the Unitary Development Plan. In total there are 15 of the 55 housing sites which continue into the new plan. The majority of these sites have progressed significantly from the UDP, as noted below:

1. Land adj. McReadys. As of 1st April 2013 the developer is on site preparing the site for development.
2. Eastern Expansion Area. Planning permission has been granted with a signed Section 106 agreement. Gallagher Estates have confirmed through the JHLAS process that they will be delivering units on site in 2015.
3. Glebelands. This site has an extant planning permission associated with the school site adjacent to the residential area. The land has recently been sold to a developer.
4. Monmouthshire Bank Sidings. Redrow are on site and progressing.
5. Traston Lane. The site has planning permission and the agent has confirmed that they anticipate development on the site in 2015.
6. Pirelli. This site has been sold to the Seren Group (RSL) who launched the development in September 2013.
7. Ty Du Works. An application is being considered by the Council for a new scheme on the site.
8. Farmwood Close. This is an historic site with a LDC for the implementation of 10 units which have not been completed. The land is currently being marketed.
9. City Vision. The developer is on site and progressing.
10. Trinity View. The developer is on site and progressing.
11. Glen Llyn. The developer is on site and progressing. A third developer (St Modwen) are anticipating to begin work on Phase 2 in 2015.
12. Mill Street. The site is owned by NCC who will market the site.
13. Herbert Road. This site is adjacent to the Glebeland site noted above. The site is compliant with the overall strategy of the LDP being a brownfield urban site in need of regeneration. There is no application on the site but the area land owner notes their intention to sell the site for development.
14. Whitehead Works. This site is part of a Welsh Government regeneration scheme, which anticipates delivery to begin in 2016.
15. Bideford Road. This site is compliant with the overall strategy of the LDP being a brownfield urban site with potential for regeneration. There is no application on the site but the area is the remaining part of a housing estate development.

The information above clearly shows that although there are a number of sites which have continued from one development plan to the other they have in the main progressed significantly or that they will be delivered within the plan period. It is also important to note that it was made clear through the UDP process that the growth proposed in the east of the city (i.e. Glen Llyn and Llanwern Village) was not anticipated to be delivered wholly within the UDP plan period.

Over Reliance on Brownfield Sites

Planning Policy Wales sets out the overarching requirement for development to be placed on brownfield sites in preference to greenfield sites. The plan allocates 82% housing units on brownfield sites with the remaining 18% of units on greenfield sites (these calculations excludes the completions, windfall and small sites supply figures). The LDP is therefore compliant with Planning Policy Wales in terms that it has followed the search sequence criteria starting with the re-use of previously developed land and buildings within settlements which are located in areas accessible to jobs and services, where there is existing infrastructure and the scope to build sustainable communities.

Range and Choice
The supply of housing is considered to provide for a clear range and choice of housing which is a clear concern for many representors. The housing sites within the Plan are located across the City, with a clear focus on regeneration in the east as per the established strategy. The Plan provides a supply of affordable units for a mixture of needs as well as providing a mix of family homes and inner city living to cater for the broad housing market. The Plan therefore has provided the opportunity for exception sites where such justification can be produced. It is considered that the plan provides a more than adequate supply of housing, both market and affordable, which is both deliverable and viable.

It is therefore considered that the LDP provides a balanced housing supply, concentrating on the continued sustainable use of previously developed land.

This site at Bakery Lane is in Green Wedge outside the settlement boundary of Castleton and in the proposed Wentlooge Special Landscape Area.

The prime purpose of Green Wedge is to prevent coalescence between urban areas. The designation is not made necessarily on the basis of the physical quality of the landscape, but rather to maintain their openness. This allocation should be retained in order to ensure the openness of the area. The boundary of Castleton was reviewed in the Settlement Boundary Methodology Background Paper and it is stated that it is proposed to continue to draw the village boundaries tightly around Castleton as the village is not considered to be a sustainable location for new development proposals. Furthermore there is sufficient supply of housing land so that there is not a requirement to allocate a green field site in an unsustainable location. It is recommended that site remain within the green wedge allocation.
**Representation Details**

by: (No grouping)

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<td>Matthews, Mr Jon</td>
<td>Carolyn Jones Planning Services</td>
<td></td>
<td>23/07/2013</td>
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**Document:** Revised LDP, p.22

**Policy:** SP08

**Summary:** Remove land at Bakery Lane, Marshfield from the SLA boundary.

---

**Soundness Test**

**CE1 CE2**

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**Representation**

Policy SP8 designates seven Special Landscape Areas throughout the City boundaries. One of these is at the Wentlooge Levels. Whilst priority within SLA's is given to landscape conservation, development is not precluded. Any development is however required to respect the valued characteristics of the recognised landscaped.

SP8 (iii) includes land at Bakery Lane, Castleton. Whilst the need to protect the special characteristics of the Wentlooge Levels is recognised & supported in principle, the identified site makes no contribution to the broader landscape of the Levels. The site is surrounded on three sides by existing established residential development and the fourth northern boundary has a line of conifer trees. As a result the site is much more related to the village than the countryside to the north-east. It certainly has no relationship to the wider Wentlooge Levels.

A sensitively designed residential development on the site would well related to the existing built up area of the village. The development would be well screened and any development would not be prominent or in an isolated position in the open countryside.

**Suggested changes**

The site at Bakery Lane should be removed from the Wentlooge Levels Special Landscape Area and should be included within the Settlement Boundary for the village of Castleton. The Proposals/Inset Maps should be amended to reflect the above, as detailed on the attached plans.

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**Speaking at Public Examination**

Yes

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**Tick-box reply**

**Soundness of LDP**

No

---

**Council Responses**

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12/02/2014
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The designation of Special Landscape Areas was assessed using the Landmap information system, as referenced in PPW, which is the data set used in the overall assessment undertaken using the Special Landscape Area Designation Criteria included within Countryside Council for Wales’ guidance. The Local Authority did refine the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. This work looked at the proposed SLAs identified by the assessment of the Landmap data and did not seek to amend this nationally consistent data set. The area land at Bakery Lane is allocated as part of the SLA3 Wentlooge Levels and this is based on the overall value of the landscape taking into account its qualities and features which have been deemed worthy of designation.
Newport City Council Local Development Plan

Representation Details

by: (No grouping)

Filtered to show: (all of) Stage=L; Status=M

Rep'n/Para/Policy Representer Agent Accession No Date Lodged Late? Source Type Mode Status Status Modified
3220.L3//SP05 Matthews, Mr Jon Carolyn Jones Planning Services 23/07/2013 E O I M

Document: Revised LDP, p.21

Policy: SP05

Summary: Amend the Countryside boundary to include land at Bakery Lane, Marshfield within the settlement boundary.

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<td>6</td>
<td>Amend the boundaries of an existing site</td>
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<td>8</td>
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Soundness Test

CE1
CE2

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<th>Representation</th>
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<td>Policy SP5 - Countryside</td>
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Policy SP5 aims to protect the countryside surrounding the city. Extensive areas of countryside are identified on the Proposals Map, including an area to the north and east of Castleton.

The principle of protecting the countryside is supported and accepted but it is considered that the extent of the countryside designations is excessive. There are areas on the fringes of the built up area which are better related to the existing settlement pattern and can be suitable for development.

One such area is the land at Bakery Lane, Castleton. This area, which extends to 2.2 hectares has existing residential development on three sides and a strong defensible boundary of mature trees on the fourth side. It therefore forms a logical extension to the village. Consequently, it is considered that the countryside designation should be deleted from the Proposals Map, and the Settlement Boundary for the village should be amended so that the site falls within the settlement boundary for Castleton.

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Soundness of LDP

No

Council Responses

12/02/2014
No change. The site is within a proposed Special Landscape Area, Green Wedge, and Countryside allocation. The plan seeks to promote the reuse of brownfield sites in preference to extensive use of greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities. The forecast housing need has been assessed in the context of population and employment projections and current market realities. The plan allocates sufficient land to meet this requirement. Additional housing allocations in a rural location cannot therefore be justified. Furthermore, the release of the representation site for housing would be contrary to the Council’s strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

A background paper ‘Delivery and Implementation’ has been produced to expand on the information supplied in Chapter 13 of the Deposit LDP. This sets out the proposed phasing, constraints and infrastructure requirements for each allocation. The Delivery of each site is considered here, setting out the justification for its continuation in the plan based on evidence from developers and landowners. Some of the large brownfield sites allocated within the previous Unitary Development Plan have started construction e.g. Glan Llyn with 4000 homes and employment uses on the site. The impact on development by the economic recession is to be considered and the plan takes a long term view across the entire plan period.

The LDP sets out a strategy for growth which allocates an adequate supply of land for residential and employment uses. The supply of this land is not concentrated in one area but across the City. It is recognised that growth in the east is significant but the west has not been overlooked with large brownfield sites allocated at Novelis, former Whitehead Works and Monmouthshire Bank Sidings. The review of village boundaries has clearly considered the need for expansion in these areas and following their assessment boundaries have been tightened and allocations resisted due to the unsuitability of sites proposed in these unsustainable locations.

Notwithstanding the representation submitted in support of this site, the Council maintains the position that the LDP is sound and relies on the evidence which supports it. In this respect, the Council does not support this site. The countryside allocation should therefore remain.
### Representation Details

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**Document:** Revised LDP, p.22

**Policy:** SP07

**Map:** Inset 2: Marshfield and Castleton Village Area

**Summary:** Remove Land at Bakery Lane, Castle ton from the Green Wedge and Special Landscape Area

---

Matthews, Mr Jon

Carolyn Jones Planning Services

Additional material submitted

Accession No: 3220.L4//SP07

Date Lodged: 23/07/2013

Late?: E O I M

Source: E O I M

Type: E O I M

Mode: E O I M

Status: E O I M

Status Modified: E O I M

12/02/2014
Policy SP7 identifies a series of Green Wedges the aim of which is to prevent coalescence between settlements. Within these areas development which prejudices the open nature of the land will not be permitted.

SP7 (i) identifies a Green Wedge between Newport & Cardiff. The principle of protecting this area is supported and this objective is reinforced by Policy SP6 which defines Green Belt to West of Marshfield & Castleton & the Newport / Cardiff boundary.

However, the area identified under these two designations is extensive and it is considered that not all sites are either needed or worthy of inclusion within the designation areas and could be excluded from the designations without prejudicing the overall objective of preventing coalescence between the two cities of Newport & Cardiff.

In this respect we consider that an area land at Bakery Lane, Castleton is suitable for development and is well related to the existing built up, rather than the wider countryside. As such, it is considered that the site should be excluded from the Green Wedge (& Special Landscape Area) and be included within the Settlement Boundary of Castleton.

The site is to the North of Bakery Lane and is contained by existing residential development on three sides. The fourth (northern) boundary is defined by a row of mature conifers. With these strong defensible boundaries the site relates more to the existing built up area of the village than to the open grazing fields to north-east. The site has defensible boundaries and makes no valuable contribution to the openness of the Green Wedge.

Development of a small scale residential scheme on the site will not have any detrimental effect on the Green Wedge and would not diminish the open area nor result in any coalescence between the village & the city of Newport.

No changes. In relation to the appropriateness of the site for inclusion in the Green Wedge allocation it is considered that the allocation of this area is in accordance with the purpose of Green Wedge as set out in Planning Policy Wales. The area of land does serve to prevent the coalescence of two settlements (Newport and Cardiff), and assists in safeguarding the countryside from encroachment.

It is also considered that the allocation of this area is in accordance with Planning Policy Wales in that normal planning and development management policies cannot provide the necessary protection (a countryside designation would not have the same level of control over certain types of development for example extensions to houses). It is considered that only land that is strictly necessary to fulfil the purposes of the policy has been provided in the designation based on the purpose of Green Wedge as identified in PPW. In this instance the openness of the land is considered important.

Piecemeal removal of parts of the Green Wedge within the boundary of Newport would serve to undermine the intention of the various Green Wedge designations in the area.
**Representation Details**

by: (No grouping)
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Document: Revised LDP, p.21
Policy: SP05
Map: Inset 7: Redwick Village Area
Summary: Amend Settlement Boundary to include land at Redwick.

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<td>Amend the boundaries of an existing site. Yes</td>
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<td>8 8 Candidate Site Name</td>
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<td>9 9 Candidate Site Reference</td>
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**Item 11** Representation

The Redwick village boundary, as it stands, is inappropriate as it does not reflect what is perceived to be the village of Redwick by the residents, i.e. the dwellings The Haven, Fair Winds and Corner House are considered to be outside the village, when they are in fact, far closer to the centre of the village than properties to the north of the plan, namely Laurel House and Daycroft Cottage, which for some peculiar reason, are considered to be in the village.

Currently the eastern village boundary lies on the land east of the reen which runs adjacent to Green Cottage. I object to the proposal to move it west of this reen.

The result of this proposed boundary change impacts significantly on the potential commercial value of my land, as it is my intention to seek planning permission for the erection of four detached houses as infill. As you will see from the map attached, my land is encompassed three sides with domestic dwellings.

The current plan shows no potential development land within the village. As such, people wishing to return to the village or looking for properties for their children are restricted if there are no properties available.

A small number of new houses would not significantly affect the character of the village if they are sympathetically developed within the local environment and this would not impact on the sustainability of the village. I feel that the village boundary needs to be extended rather than contracted, to promote further controlled development.

A new village has been erected funded by the Big Lottery (300K) and Welsh Assembly Government (200K). Surely with the amount spent on this project the aim should be to maintain and develop the village community and not further constrict the boundaries and thus prevent any future newcomers to the village!

I understand the Welsh Assembly Government (WAG) has granted planning permission for a large development on the former Llanwern lies lower than that of Redwick and does not benefit from the management of the Caldicot and Wentlooge Water Board. We understand that to satisfy WAG the developers have agreed to incorporate large lakes to accommodate any flood risk. Obviously lakes are full of water already so where does any flood water go? You will no doubt be aware, that recent work has been undertaken to improve the sea wall east of the River Usk to the standard that currently exists at Redwick, which has not been flooded for over 400 years! I note that following the work undertaken east of the Usk, you now consider this land to be suitable as a candidate site for planning. If you consider Redwick as a potential flood plain, then equally these sites should be classified the same.

Therefore, I think that the plot of land mentioned should be included in the village boundary to allow controlled and gradual development of the village.

| 12 12 Speaking at Public Examination | No |

12/02/2014 Page 673 of 1581
Council Response

The Newport LDP Preferred Strategy discourages development in Redwick unless it would serve a clear strategic purpose. Any amendment to the settlement boundary that might result in inappropriate housing development would clearly be at variance with this principle. One ought to bear in mind, however, that Policy H5 of the LDP allows for exceptions where affordable housing is concerned. Specifically, it is stated that, where a genuine local need is identified, proposals for affordable housing on sites within, or adjacent to, settlements will be considered favourably, provided that such housing would remain affordable in the long term.

The Revised Deposit LDP promotes 'brownfield' development, whereby proposals are directed towards previously developed sites with comprehensive public-transport networks. Redwick, a small rural village with few public-transport links, is the type of location where further development is resisted in order to prevent the coalescence of urban and rural settlements. To this end, it is proposed to maintain a tight village boundary around the existing built form and those sites which benefit from 'live' planning permission.
Representation Details

Filtered to show: (all of) Stage=L; Status=M
by: (No grouping)

Rep'n/Para/Policy     Representor                                                                      Agent              Accession No    Date Lodged    Late?   Source   Type    Mode     Status     Status Modified
3242.L1/Objectiv   19/07/2013 O M

Document:Revised LDP, p.9  Policy: Objective 02  Summary: Suggest revision to Plan to incorporate air quality into its core objectives and strategic policies.

Item Question  Representation Text

11 11  

Air Quality
Environmental Health feel it is essential that the Council includes its commitment to improving Air Quality within the LDP as currently it makes little reference to it, particularly within its Sustainability, Objectives and Strategic Policy sections. Improving air quality in Newport is a statutory requirement and is therefore a priority objective for Environmental Health, and the Council. Climate Change and its potential impact appears well represented within the Deposit Plan although Environmental Health consider the impacts of air quality are equally important, given its impacts have severe public health implications and are arguably more tangible than those attributed to climate change particularly at a local level.

To improve air quality within the authority area Environmental Health has produced an Air Quality Action Plan. The current version is in draft form but is anticipated to become a formal document during the Summer of this year. The plan details the current areas where monitoring has shown that air quality poses an unacceptable risk to health and proposes measures which when implemented will reduce air pollution and improve air quality. All areas which suffer from poor air quality do so predominantly as a result of road transport.

Although there is some cross reference to air quality within Section 3 – ‘General Policies’ of the Deposit Plan, Environmental Health feel that given its importance in terms of public health a section should be incorporated within the other core sections of the Plan giving it similar weight and importance as the climate change objectives. Therefore it is suggested that the Deposit Plan should be revised to include ‘Climate Change & Air Quality’ within its core objectives section. Many of the considerations applicable to mitigating against climate change, for example sustainable design of developments and incorporating sustainable travel considerations into new development at the design stage, will also help improve local air quality.

In addition to its consideration for new proposed development another key area where the incorporation of air quality is essential is Transport given that the majority of poor air quality is a result of highways emissions - Objective 8.

The incorporation of air quality considerations (the wording can be provided if necessary) into the ‘Strategic Policies’ section, particularly SP1 Sustainability, is also required. Again there is a robust consideration of climate change in this section, many aspects of which provide substantial overlap with those related to air quality.

SP2 ‘Health’ is also an obvious strategic aim which should incorporate the Council’s air quality ambitions given the well-established links between respiratory illnesses, increased mortality and poor air quality. This section current makes a tentative connection between climate change and health impacts but is lacking sufficient reference to poor air quality.

Finally as the main source of poor air quality within the authority area ‘SP14 Transport Proposals’ should also contain greater emphasis on the benefits of improving air quality by promoting sustainable travel.

Item Question  Council Responses

13 13  

Council Response

The plan is read as a whole and therefore it is considered that the plan adequately covers the issue of air quality and recognises this within the text of objectives and strategic policies. For example, the supporting text to Objective 9 - Health & Well-being specifically makes reference to air quality issues. Wording will be added to paragraph 1.8 'Climate change' to recognise the need for the plan to cover this issue.
One of Environmental Health’s statutory duties is the requirement to identify and assess contaminated land. An important precursor to this process is ensuring that development of brownfield sites adequately addresses historic ground contamination and to ensure each site is fit for purpose. Environmental Health have recently prepared a revised Contaminated Land Strategy document which we would encourage all stakeholder groups to consider when brownfield sites are put forward for development.

Therefore given the large amount of reference to brownfield sites within the Deposit Plan and the preference for these sites over greenfield sites for development, we would like to see more emphasis on the responsibility for developers to undertake ground assessment and remediation and therefore ensure sites are ‘fit for purpose’. In addition preference for those developments which go beyond simply satisfying regulatory requirements and provide additional ‘betterment’ for brownfield sites should be encouraged.

The wider environmental benefits of remediating sites should also receive greater recognition within the Deposit Plan. For example, the impact of contaminated land and ground water on ecological receptors such as sensitive habitats (River Usk, Gwent Levels etc) should be mentioned.

Inclusion of additional reference to the Council’s commitment to safeguarding public health and the wider environment through the requirement to assess and remediate contaminated land prior to development could be included within Objective 1 (Sustainable use of Land) and Objective 9 (Health and Well-being). In addition improved reference to this area in Strategic Policies SP1 Sustainability and SP2 Health is also required.
Item Question  Council Responses

11 Representation

Houses in Multiple Occupation
Regarding Section H8 (ii) which is currently worded as:

"THE PROPOSAL DOES NOT CREATE AN OVER CONCENTRATION OF HOUSES IN MULTIPLE OCCUPATION IN ANY ONE AREA OF THE CITY WHICH WOULD CHANGE THE CHARACTER OF THE NEIGHBOURHOOD OR CREATE AN IMBALANCE IN THE HOUSING STOCK;"

We suggest that the wording should be amended to say "...which would have a detrimental impact on the character of the neighbourhood..."

This is because not all HMOs have a detrimental impact on neighbourhoods, and some areas of Newport (either now or in the future), may benefit from a number of properties being converted into HMOs.

In order to strive to prevent a situation occurring where Planning Permission is granted, development works completed and then Environmental Health require further works, we also request the following:

"iv) the Proposals meet the standards set by Newport City Council's Houses in Multiple Occupation Licensing Scheme."

13 Council Response

It is considered that the policy is clear as to its intention to protect the character of an area. The proposal of an additional criterion is not considered appropriate. This is due to that fact that as a land use planning document which can only consider planning issues. It is therefore not appropriate to provide advice or guidance on different legislative processes such as the Housing in Multiple Occupation Licensing Scheme.
In 2002 the European Commission proposed a Directive relating to the assessment and management of Environmental Noise. The European Parliament and Council have adopted the Assessment and Management of Environmental Noise 2002/49/EC, more commonly referred to as the Environmental Noise Directive (END). The END deals with noise from road, rail, air traffic, and from industry. It focuses on the impact of such noise on individuals, complementing existing EU legislation, which sets standards for noise emissions from specific sources.

The aim of the END is to define a common approach to environmental noise issues across the European Union. The three main objectives of the END are:

- To determine the noise exposure of the population through noise mapping.
- To make information available on environmental noise to the public.
- To establish Action Plans based on the mapping results, to reduce noise levels where necessary, and to preserve environmental noise quality where it is good.

The Directive was transposed into Welsh legislation by the National Assembly for Wales as Welsh Statutory Instrument 2006 No. 2629 (W.225) The Environmental Noise (Wales) Regulations 2006. It is a requirement of the action plans to identify quiet areas and aim to protect them against an increase in noise. The action plans state the intention to link the initial identification of quiet areas with locations of public amenity and open space identified by local authorities as being important to their local communities.

In summary, Noise Action Planning Priority Areas (NAPPAs) will aim to prevent an increase in environmental noise and reduce it if necessary in defined areas of Newport. Quiet Areas will aim to preserve environmental noise quality where it is good i.e. protect them against increase in noise. Once an area has been designated as a Quiet Area, Planning Policy Wales requires development plan policies to have regard to the need to protect it from an increase in noise, and requires special consideration where noise-generating development is proposed nearby.

Therefore we feel that the Deposit Plan must make detailed reference to the Environmental Noise Directive. NAPPAs and Quiet Areas, once designated, will impact the nature of development that can take place and this must be reflected in the Deposit Plan.

GP7 makes it clear that noise is a health consideration, and it is felt that potential harm may be assessed in detail during the consultation stages of planning applications. There is no need to make this policy verbose. At this stage, no Quiet Areas have been designated by the Welsh Government.
### Representation Details

**Document:** Revised LDP, p.49  
**Policy:** GP07  
**Summary:** Proposed changes to Policy GP7

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| 11 | "Odour" should be included in the capitalised summary (can occur from A3 premises etc.).  
- There should be mention of "Loss of Amenity" in addition to harm to health in the capitalised summary.  
- There is mention of Planning Policy Wales, Chapter 13 in GP7 and in that document is mention of the Environmental Noise Directive but as contaminated land and air quality are specifically mentioned in the Deposit Plan, noise mapping and quiet areas should be too.  
- GP7 could be improved to better reflect the amount of input EH have to protect Amenity and Public Health (e.g. noise sensitive development, noisy development, new roads etc.).  
- The EA and "other regulatory bodies" are mentioned. That could imply external regulatory bodies. This should be extended to include internal (NCC) statutory consultees as EH cover the majority of the issues in the summary. |

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| 13 | Council Response  
Odour could be considered under other identified risk to environment, local amenity or public health and safety. The list in the policy is not exhaustive as there may be other health considerations that are of interest depending on the development being considered.  
Impact on amenity is considered in Policy GP2 of the plan and therefore does not need to be repeated.  
Paragraph 3.44 makes reference to the preparation of a Noise Action Plan and quiet areas and also in Policy 4.10 |
### Representation Details

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<td></td>
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</table>

Document: Revised LDP, p.6
Policy: Intro & Overview
Summary: Conclusion of representation

**Item Question - Representation Text**

11 11 Representation

We would be grateful if the Deposit Plan could be revised to take into account the representations in this document. Environmental Health will fully support the Planning Policy team to revise the Plan including the provision of written text where requested.

**Item Question - Council Responses**

13 13 Council Response

Comments in submitted documents have been noted and addressed directly under the relevant sections/policy headings.

---

| 3265.L1//General | Hurford, Ms Janet |       | 16/07/2013 | P |       | S | M |

Document: Revised LDP, p.75
Policy: General G&T
Summary: Support for plan, including removal of gypsy and traveller sites from Nash/Goldcliff/Whitson area.

**Item Question - Representation Text**

11 11 Representation


The removal of the proposed gypsy sites from Nash/Goldcliff/Whitson area has my upmost support, as the levels in this area are not suitable for any type of development, let alone a single storey, temporary dwelling that could take the biggest impact of all from flooding. The area is not supported by mains drainage, a sustainable transport solution, or adequate highways to support a transitional living encampment.

I still believe that the best option for these gypsy sites is to replicate the social housing model, where a certain % of all future developments provide an area for a small gypsy site. This prevents a single area taking all of the impact, pushes the development onto developers as part of the planning process, and stops us creating areas of social exclusion.

**Item Question - Council Responses**

13 13 Council Response

Support noted.
### Representation Details

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<tr>
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<td><strong>Policy:</strong> SP05</td>
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<td><strong>Summary:</strong> Support the Llanvaches village boundary.</td>
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#### Item Question  Representation Text

**11**

Having viewed the Revised Deposit Local Development Plan for Newport City Council we strongly support the Llanvaches village boundary as represented by Inset 13.

As this is a rural community it is important for residents wellbeing to preserve special landscape areas and environmental spaces.

#### Item Question  Council Responses

**13**

Support noted.

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### Representation Details

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<td><strong>Summary:</strong> Support the Plan as it does not propose any development at Llanvaches</td>
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#### Item Question  Representation Text

**11**

Following a meeting at the Llanvaches Village Hall regarding the Revised Deposit Newport LDP 2011 - 2026, I am writing to confirm that I support the current revisions that affect Llanvaches. I understand that no submissions have been made regarding any development at the Cayo or at the Rock and Fountain- I strongly oppose any possible development at both of these sites.

#### Item Question  Council Responses

**13**

Opposition to the development at Llanvaches noted.
### Representation Details

**Document:** Revised LDP, p.65  
**Policy:** H01  
**Summary:** Object to housing proposals at the Rock and Fountain and Long Meadow (Cayo).

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<td>E</td>
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<td>M</td>
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#### Item Question  Representation Text

11

**Representation**  
Re. Proposed changes to the LDP for Llanvaches

We understand that a request has been made to include two areas of land within the Llanvaches Local Development Plan. We object strongly to these being included in the LDP for Llanvaches.

One is for a proposed residential development to the rear of the Rock and Fountain. As has already been noted by the Council, this site is detached from the village of Llanvaches and is in a remote unsustainable location. We request this area of land to remain as countryside in the LDP and for the land to be protected from development.

A second proposal is for houses on Long Meadow (between Rectory Road and the Cayo). Again, we request this area of land to remain as countryside in the LDP and for the land to be protected from development.

The number of new houses from both of these sites would change the character of Llanvaches. We have lived here for over 30 years and aver that the existing village boundary (as amended to exclude the football and playing fields) is appropriate as it stands in the UDP.

Given its remote location and lack of public transport, Llanvaches is not the type of village where development should be encouraged. Further, the main method of transport in and out of the village is by car. The village infrastructure in terms of access roads would not support the proposed developments; the disturbance involved with such significant developments would also put a huge strain on the village.

Llanvaches is a village characterised by being rural, quiet, low crime, and with modest development limited to infill and sympathetic barn conversions. Given its remote location, poor infrastructure and roads, and lack of public transport, Llanvaches is not the type of village where significant development should be encouraged.

Further, we submit that all of the housing needs identified currently are adequately met by other development sites already identified, and if more sites are needed, we suggest that the Council should look to locate developments on brownfield sites in sustainable locations.

We therefore request that the areas of land surrounding the current boundary remain as countryside in the LDP.

#### Item Question  Council Responses

13

**Council Response**  
Opposition to the development at Llanvaches and support for the village boundary are noted.
Having attended an extremely informative presentation of the Llanvaches LDP plan we would ask that the following considerations be made regarding any further planning applications.

1. As shown in the presentation by Mr Clive Bevan we have some serious flooding issues that need to be addressed prior to any further planning applications being granted. This particular issue has been raised and ignored regarding previous granted planning applications. Decisions that have resulted in worsening flooding for the residents of the village.

2. The sewerage system is at full capacity and cannot support any further additions to it.

3. The broadband in the village has no spare capacity causing frustration to residents and especially detrimental to businesses in the area with potential to affect their livelihoods.

4. Consider road access to the village and the impact of additional traffic. We already experience difficulties due to increase of vehicle use. This is especially problematic for those residents living on Tabernacle Road when trying to access and exit their driveways.

The Local Development Plan has a range of policies which include the consideration of a development's impact on flood risk, traffic and infrastructure. Planning applications will need to satisfy these policies as they currently do under the adopted Unitary Development Plan. Broadband issues should be resolved by the current Superconnected Cities project.
**Representation Details**

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**Document:** Revised LDP, p.113  
**Policy:** CF13  
**Summary:** Queries regarding CF13 and school improvements to Bassaleg School (response to queries from Mark Hand dated 19/07/2013).

---

### Item Question Representation Text

11  
I have been reviewing the above document prior to the closing date for comments on the 26th July. Section CF13 referring to School Sites is of particular concern as the Council's policy for additional and enhanced school facilities to meet future educational needs makes no mention of Bassaleg School. In this respect the Housing Section of the Report confirms that the former Novelis Alcan site at Rogerstone is expected to provide circa 780 homes over the plan period thereby requiring the provision of a new primary school. However, there is no corresponding acknowledgement that 11-18 year old children will fall into the catchment area of Bassaleg School and what impact this may have on our aging buildings and school campus. It appears that NCC do not propose to undertake any significant capital investment at Bassaleg School for the plan period ending in 2026 and I would be grateful if you could please confirm this point. I would also be grateful if you would please clarify Section CF13 in relation to the previous 21st Century School Funding bid submitted by NCC. In this bid it was my understanding that there was a clear intent to remove and replace demountable class rooms across the Newport School Estate. Can you please confirm the current status of this bid and whether Section CF13 effectively supersedes the Council's previous intentions regarding demountable class rooms. 
As time is of the essence can you please ensure that I receive a prompt reply to the above questions as subject to your response I may wish to submit a formal objection on behalf of Bassaleg School to Section CF13 by the 26th July LDP closing date. I would draw to your attention that I now propose to seek clarification direct from WG regarding the future use of any capital monies allocated to NCC under the 21st Century Schools Programme.
I look forward to hearing from you.

---

### Item Question Council Responses

13  
Council Response

This policy relates to the allocation of land for new schools. Proposals to extend existing schools would be assessed in the usual fashion during the development-management process. Details of specific education policies should be sought from Education Services.
Document: Revised LDP, p. 75
Policy: General G&T
Summary: Support the Gypsy and Traveller allocations.

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<td>We believe that the proposals for the Transit and other provision for Travellers are now ones we can support.</td>
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Support noted.
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### Representation Details

**Rep'n/Para/Policy**: 3520.L1//H01.54

**Representor**: Walters Land (Rogerstone) Limited

**Agent**: Savills

**Accession No**: 3520.L1//H01.54

**Date Lodged**: 26/07/2013

**Late?**: E

**Source**: C

**Mode**: M

**Status**: M

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Document: Revised LDP, p.68

Policy: H01.54

Summary: General comments regarding to site.
**Newport City Council Local Development Plan**

**Representation Details**

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**Newport Revised Deposit Local Development Plan**

Representations on behalf of the Walters Land (Rogerstone) Limited Land at the former Alcan/Novelis factory site and related policies Savills is instructed by Walters Land (Rogerstone) Limited (Walters) to make representations in respect of the Newport Revised Deposit Local Development Plan (RDLDP) This letter summarises the representations concerning policies relating to or which could affect the redevelopment of the former Alcan site at Rogerstone (also referred to within the plan as the Novelis site) but now known as Jubilee Park.

This letter should be read in conjunction with the representation forms, which are enclosed. It begins with a summary of the substantial progress that Walters has made since completing the site’s purchase in March 2012 and securing a positive resolution by Members of the Planning Committee in April 2013.

There is significant alignment between Walters’ ambitions for the site and the content of the RDLDP and, on this basis, much of what we say is positive and supportive. However, there are some areas of the plan that we consider can and should be improved. This letter provides essential context, which explains the rationale behind our comments (which are contained on the individual representation forms and summarised in this letter).

In this light, our comments relate to the following policies or parts of the plan:

- Policy SP1 – Sustainability and SP10 – House Building Requirement
- Policy SP13 – Planning Obligations
- Policy SP16 – Major Road Schemes
- Policy H1(54) and H1(55) – Housing Sites
- Policy H4 – Affordable Housing
- Policy EM2 – Regeneration Site
- Policy T1 – Railways
- Policy CF13 – School Sites
- Policy GP1 – General Development Principles
- Policy GP3 – Service Infrastructure

**Background – Walters Basic Position**

The site presents a major regeneration opportunity and this has been recognised by Newport City Council (NCC) in their positive recommendation to Members of the Planning Committee, resulting in the application (LPA Ref. 12/0886) securing a resolution to approve subject to the signing of a Section 106 Agreement.

The site was previously the location of a large aluminium plant, which closed in April 2009. Since then it has been cleared of all buildings (aside from Mandrake House and the ‘drill hall’) in preparation for reclamation and redevelopment. The whole site was acquired by Walters (in March 2012) and the very positive progress that has already been made is testament to their commitment to deliver the regeneration of the site within the plan period and in the short term.

Reference is made to the site under Policy H1(54) and EM2(x). Subject to the small changes recorded in this letter, these policies capture the potential of regenerating the site to create a new mixed use but housing led development.

As noted above, a resolution to approve the scheme was agreed by Members of the Planning Committee in April 2013, subject to the signing of the Section 106 Agreement (which is due to happen very soon). When issued, the outline planning permission will deliver up to 1,200 new homes, a primary school, local centre, community facilities and a green grid of new and improved open space including parks, play space and informal areas.

Walters already knows a lot about the site having undertaken a number of detailed investigations and assessments as part of the planning application (an Environmental Impact Assessment (EIA) application). A team of consultants were appointed to assess the characteristics and conditions of the site to inform the submission, including detailed assessments on flood risk, ground conditions, highways, landscape, archaeology and ecology. A design team were also commissioned to prepare an Outline Masterplan and Design and Access Statement setting out the broad parameters for the site. With the benefit of all this knowledge and their experience in regeneration and redevelopment, Walters is confident that comprehensive redevelopment can be delivered bringing forward a significant amount of new housing within the plan period. In fact, consultants have now been appointed to work up the detailed design to inform the reserved matters applications that will be submitted shortly.

Walters’ plan is ambitious but realistic with current timescales proposing to begin land remediation and reclamation as early as the end of this summer. We know that this is achievable as Walters Land Limited (WLL) is a land development company specialising in remediating and preparing brownfield sites for development. WLL uses the complementary resources of the other Walters Group companies to carry out the remediation works. Their vast experience and the resources available for reclaiming and remediating sites and preparing them for development ensures that each site can be delivered in a relatively short period of time.

Reserved matters applications setting out more detailed proposals for the first phase of development (and the infrastructure that will serve it) are scheduled to be submitted in autumn 2013. All this activity and momentum is very positive and reinforces Walters’ commitment to Jubilee Park and its future development in the plan period.
On this basis, Walters is delighted to see the site identified as an ‘Urban Regeneration’ site in the RDLDP. More specifically, the site’s allocation comes in two places – in Policy H1(54), which allocates the former Alcan site for 925 dwellings and a primary school and in Policy EM2(x), which allocates the site for a variety of uses including office, commercial, leisure, residential and community uses. Walters’ view is however that the site should be the subject of just one allocation (to avoid potential confusion) and that the 925 figure should not be treated as an upper limit for the amount of housing that can be achieved on the site. The reasons for these statements are made in light of the fact that Walters has already secured a resolution to approve a mixed use, housing led regeneration of the site that could deliver up to 1,200 new homes. In this context the following key representations are made to the DLDP.

Objection – Requirement to prioritise previously developed land for new housing
The allocation of new sites for residential development is predominantly weighted towards previously developed, or brownfield, sites in terms of site area and numbers. There is however an allocation for a new greenfield development. Given the plan’s overall strategy to prioritise previously developed land in preference to greenfield sites, as set out within PPW and Strategic Policy SP1 of the RDLDP, it would be appropriate to include a phasing policy within the housing chapter, which requires that allocations for previously developed sites come forward in advance of any greenfield sites. This would particularly assist regeneration sites, such as the Novelis, as well as numerous other brownfield sites in the area.

Summary and Conclusions
As we said at the start of this letter, and for obvious reasons, there is a lot to support in the RDLDP. These representations welcome the allocation made for the Novelis site and, even at this early stage, should provide the Council with the confidence that the site can and will deliver development proposed under Policy H1(54).

The control of the site by a single, land development company which specialises in making sites like this ready for development by housebuilders, together with the resolution that is in place for the outline planning application, underscores the prospects of delivery early in the plan period. The signing of the legal agreement is imminent, which will release the consent to allow Walters to meet their timescales to begin site remediation at the end of the summer.

There are places where the plan can be improved, and three key changes are recommended. The first is that, whilst supporting the basic allocation, the RDLDP needs to recognise that more housing can be delivered from the site or that the figure currently used is not an upper limit.

The second is the need to ensure that previously developed sites come first. This can be easily achieved through the deletion of the new greenfield site (which is not needed to meet the requirements the plan aims to accommodate). Alternatively more emphasis can be given to a sequence that starts with previously developed sites or which postpones or reserves any new greenfield sites until the later stages of the plan period.

The third is the deletion of the site from Policy EM2(x), which we believe is unnecessary, given the site’s housing allocation under Policy H1 and the clear potential it has to provide a substantial number of new homes. Other objections are raised in relation to general development control policies and in order to ensure that the provision of school places in relation to the development is commensurate with the development that is to be provided on site.

None of these changes threaten the integrity of what we see as a generally very good plan – we just think it could be better, more sustainable and more accurate in terms of the sites it relies on and the sequence it follows.

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<th>Item Question</th>
<th>Council Responses</th>
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<td>13</td>
<td>Support noted and clarification as to the delivery rates anticipated on site is welcomed. The Planning application notes that the site can deliver up to 1200 units. However the final figure for the site is yet to be agreed. The housing table will be updated for the examination to reflect the most up to date position for each of the sites. It is considered that the Plan contains sufficient support for the Alcan development. In terms of holding back greenfield sites it is unclear whether this type of approach could be achieved, particularly given that planning permissions for greenfield sites are already in place. The representation states that the new greenfield sites allocated within the plan should be deleted, removal of the site from EM2(x) and the objections to the general development policies will all be dealt with under specific representations.</td>
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### Representation Details

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**Document:** Revised LDP, p.24

**Policy:** SP10

**Summary:** Object to housing requirement in Policy SP10.

**Item Question**

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<td>11 11</td>
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This form should be read in conjunction with the covering letter submitted on behalf of Walters Land (Rogerstone) Limited, dated 26/07/13, which sets out the full background and justification for the representations.

SP10 is considered to make an overprovision for new housing land and does not prioritise previously developed sites in the way that PPW advises.

In this light our recommended changes are:

a) Reduce total housing provision to be more in line with WG projections (specifically by removing the 12% contingency that sees the total number being far in excess of the WG projections).

b) To make it clear that a proper sequence to land release and development is to be followed in each category (where this is possible) and that any greenfield sites will be kept in reserve and will be released only if there is a demonstrable failure of the City's stock of previously developed sites.

Strategic Policy SP1(ii) and SP10 – Development Sequence, Housebuilding Requirement and Phasing

The above point about the capacity of the site is important when the plan’s strategic policies are considered. Policy SP1(ii) makes it clear that the DLDP’s priority is to secure the regeneration of previously developed sites before greenfield land is released for development. This is sensible and sustainable and reflects a strong and established national policy direction. It is then repeated in much of the language of Policy SP10, but is undermined by the sequence that the policy uses (in points I – iv) and the inclusion of a greenfield allocation that this list relies on.

As we see it at the moment, the DLDP proposes a very high amount of housing and a lot more than the Welsh Government projections. The figure that the sites summarised under parts I – iv comes to over 11,622 which, on the face of it, is a significant and unnecessary contingency – even before the additional amount that the Novelis site could add. On this basis and either to reflect the extra development that Novelis could deliver, or the need to reduce the over provision, the new greenfield site identified in the plan should be deleted (see below). This would improve the performance of the plan without threatening the delivery of the housing numbers that lies at the heart of its housing strategy. The alternative would be to establish a clearer sequence in points I – iv of Policy SP10. At the moment this could see no distinction between the new allocations in Policy H1. We are sure that this is not the intention of the RDLDP’s authors, but it could be the outcome. It can be straightforwardly resolved by making it clear that the preference in each category will be for the redevelopment of previously developed sites rather than through the release of greenfield land. This installs the proper planning sequence. A second alternative if the Council was adamant that new greenfield releases are necessary is to ensure that they are only made in later phases of the plan period (during 2021 – 2026). This then provides a safeguard in the very unlikely event that any of the sites do not perform. On this basis, whilst we support Policy SP1, we object to Policy SP10 as it is currently drafted. The change sought is either to make a reduction on the new allocations (see below) and/or to make it clear that a sequential approach will be adopted which explicitly prioritises the redevelopment of previously developed sites in all the categories listed under parts I – iv of the Policy.

**Speaking at Public Examination**

It is important that the developers are represented at the examination in order to ensure that any discussion on housing numbers or new greenfield sites is informed fully.

**Item Question**

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The Council response to the cover letter can be found against representation 3520.L1. The response to the proposed deletion of the Woodlands site can be found against representation 3520.L5. There is no set flexibility figure required for housing supply within development plans. However, during the examination of the Brecon Beacons National Park LDP WG noted a notional figure of 10% but that needed to reflect local circumstances. Other authorities within South East Wales have a range of 12-20% flexibility. It is good practice to allow for unknowns and the need for flexibility within a development plan is inherent from National Planning Policy. In Newport’s case the majority of the housing supply has planning permission or is being progressed. Those remaining 9 sites without planning permission are in line with the overall strategy or regeneration needs of the plan. Together they provide a 12% oversupply which is considered appropriate to enable the plan to cope with uncertainties that may arise over the plan period.

It is considered that the Plan contains sufficient support for the Alcan (Novelis) development. It is unclear whether this type of approach could be achieved, particularly given that planning permissions for greenfield sites are already in place.
Representation Details

Filtered to show: (all of) Stage=L; Status=M
by: (No grouping)

Rep’n/Para/Policy Representer
3520.L3//SP13 Walters Land (Rogerstone) Limited

Agent
Savills

Accession No
25/07/2013

Date Lodged
25/07/2013

Late?
E

Source
C

Type
M

Mode

Status

Status Modified

Document: Revised LDP, p.28
Policy: SP13

Summary: Viability needs greater recognition in Policy SP13.

Item Question Representation Text

3 New Policy

10 Soundness Test

C2, CE2, CE4

11 Representation

This form should be read in conjunction with the covering letter submitted on behalf of Walters Land (Rogerstone) Limited, dated 26/07/13, which sets out the full background and justification for the representations. Greater recognition needs to be included in this policy to development viability being a fundamental consideration when seeking planning obligations and/or CIL. Where viability is proven to be hindered by planning obligation and/or CIL requirements, the Council will need to consider the planning obligation priorities for that particular development, having regard to the site location and local needs in the vicinity. This approach should be taken by the Council in any event, and sufficient justification ought to be provided by the Council for all planning obligations to make sure they meet the planning obligations tests contained in Circular 13/97.

Policy SP13 – Planning Obligations

Policy SP13 provides the policy framework for the Council to seek developer contributions towards community infrastructure, facilities and services. The policy is phrased so that it can apply to securing planning obligations under Section 106 or through levy receipts under the CIL Regulations 2010, as amended. Greater recognition needs to be included in this policy to development viability being a fundamental consideration when seeking planning obligations and/or CIL. Where viability is proven to be hindered by planning obligation and/or CIL requirements, the Council will need to consider the planning obligation priorities for that particular development, having regard to the site location and local needs in the vicinity. This approach should be taken by the Council in any event, and sufficient justification ought to be provided by the Council for all planning obligations to make sure they meet the planning obligations tests contained in Circular 13/97.

12 Speaking at Public Examination

No

Item Question Council Responses

13 Council Response

The Community Infrastructure Levy Charging Schedule will be set at a financially viable level, following a Viability Assessment and consequent adoption following Examination. The methodology used to implement SP13 – Planning Obligations, will be set out in the Planning Obligations Supplementary Planning Guidance (SPG). The currently adopted Planning Obligations SPG addresses the issue of financial viability and the approach the Council will take in negotiating S106 agreements. The re-adoption of the Planning Obligations SPG is noted as a high priority in Chapter 14 of the Revised Deposit LDP.
### Item Question Representation Text

11 Representation

This form should be read in conjunction with the covering letter submitted on behalf of Walters Land (Rogerstone) Limited, dated 26/07/13, which sets out the full background and justification for the representations.

SP16(i) proposes strategic highway improvements at Junction 28 (Tredegar Park Interchange) of the M4 motorway. Recognition that improvements are required to alleviate the congestion experienced at this junction is fully supported by Walters.

12 Speaking at Public Examination

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<tr>
<th>Item Question</th>
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<tr>
<td>11 Representation</td>
<td>This form should be read in conjunction with the covering letter submitted on behalf of Walters Land (Rogerstone) Limited, dated 26/07/13, which sets out the full background and justification for the representations. SP16(i) proposes strategic highway improvements at Junction 28 (Tredegar Park Interchange) of the M4 motorway. Recognition that improvements are required to alleviate the congestion experienced at this junction is fully supported by Walters.</td>
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<td>Savills</td>
<td>25/07/2013</td>
<td>E</td>
<td>C</td>
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Document: Revised LDP, p.30, para.(i)

Policy: SP16

Summary: Support Policy SP16.
### Representation Details

**Document:** Revised LDP, p.68  
**Policy:** H01.55  
**Summary:** Delete H01 (55) housing allocation.

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**Agent:** Walters Land (Rogerstone) Limited  
**Representer:** Savills  
**Accession No:** 3520.L5/H01.55  
**Date Lodged:** 25/07/2013  
**Source:** E  
**Type:** C  
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**Status:** M  
**Status Modified:** 12/02/2014
Representation Details

Representation Details

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This form should be read in conjunction with the covering letter submitted on behalf of Walters Land (Rogerstone) Limited, dated 26/07/13, which sets out the full background and justification for the representations.

Policy H1 is a key policy. Once all of the sources of housing are accounted for, this policy makes provision for a total of 11,622 new dwellings (including a 12% contingency) over the plan period (to 2026). This is substantially more land than is required. In this light, our comments on, objections to or recommendations for Policy H1 are as follows:

a) To support H1(47)
b) To consider the introduction of a phasing dimension to the allocations
c) To delete allocation H1(55)
d) Or to reserve this site for release only if needed.

H1(54) and H1(55) – Housing
Policy H1 is a key policy. Once all of the sources of housing are accounted for, a total of 11,622 new dwellings (including a 12% contingency) over the plan period (to 2026) is proposed. This is substantially more land than is required. If the most recent WG projection is used, land for a total of 7,500 new homes is required. If unchanged, Policy H1 provides for about 4,100 more than this or very nearly 55% more than the number required in WG’s most up to date projections.

It is clearly a decision for Council’s whether they decide to over or under provide for housing (against the most up to date projections). However this is a significant over provision and whilst there is some very brief explanation given in the plan, this neither recognises the scale of the difference nor explains the need for it. This is important because the Council has a number of sites with planning permission (or resolutions) that it wishes to bring forward for redevelopment and further unnecessary allocations (either because of type of land or location) could deflect attention away from these priorities. We know that the Council agrees with this basic proposition from earlier statements in the plan. This is significant because there is a substantial allocation for new or additional greenfield sites, under Policy H1. This is at the Woodland Site, Ringland (H1(55) – 300 units). This site should be deleted from the plan as it is not needed and could have an adverse impact on the delivery of key previously developed sites including Jubilee Park. The impact on housing numbers would be minimal and deletion of this new greenfield site would therefore improve the performance of the plan (and the principles and sequence it wishes to follow) without threatening strategy at any level. Looking more positively at the terms of Policy H1, we can confirm our full support for the allocation of the Jubilee Park (former Alcan site) under H1(54), which is identified to deliver a significant number of dwellings within the plan period. The Council should have the confidence that Walters, who are highly experienced and have an excellent track record in reclaiming and redeveloping post industrial sites, are committed to the redevelopment of this site and can deliver early benefits, in the form of new housing, within the plan period. For the reasons described earlier in this letter, the plan should recognise that more housing can be delivered on the site. A total of 1,200 new homes on the site should be targeted, or it should be made clear that the 925 figure is not an upper limit.

In this light, our comments on, objections to or recommendations for Policy H1 are as follows:

a) To support H1(54)
b) To consider the introduction of a phasing dimension to the allocations
c) To delete allocation H1(55)
d) Or to reserve this site for release only if needed.

For the reasons described above, we object to the allocations at H1(55) or recommend that it is included as reserve sites only (to be called on should the other sequentially preferable sites fail in any way).

12 12 Speaking at Public Examination

It is important that the developers are represented at the examination in order to ensure that any discussion on housing numbers or new greenfield sites is informed fully.

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<th>Item Question</th>
<th>Tick-box reply</th>
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<tr>
<td>2 2 Soundness of LDP</td>
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12/02/2014
Representation Details

Council Response

Support noted. A response to the cover letter can be found in 3520.L1.

The woodlands site is located within the settlement boundary. The site is part of the disposal programme for the Council and as such the allocation reflects Council's intention to dispose of the land for future development.

Following representations at the Deposit LDP stage the housing requirement figure has been justified and increased from the proposed Welsh Government Population projections. There is scope for an authority to deviate from the WG population projections but this deviation is required to be well evidenced. The NLP assessment sets out this evidence base and illustrates that Newport, as one of the few areas in Wales with an anticipated population increase noted in the Census, is set to grow and reflects the Council’s policy aspiration for growth. It should be recognised that the majority of the sites (46 of 55) have planning permission or permission subject to a Section 106 agreement. This established supply with clear market intent illustrates not only that a growth strategy is appropriate but achievable.

It is considered that the Plan contains sufficient support for brownfield development. In terms of holding back greenfield sites it is unclear whether this type of approach could be achieved, particularly given that planning permissions for greenfield sites are already in place.
### Representation Details

**Document:** Revised LDP, p.68  
**Policy:** H01.54  
**Summary:** Support for H1 (54) housing allocation.

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<td>Soundness Test</td>
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- Whilst H(54) is supported, other objections indicate that the plan is unsound in other regards.
Representation Details

This form should be read in conjunction with the covering letter submitted on behalf of Walters Land (Rogerstone) Limited, dated 26/07/13, which sets out the full background and justification for the representations.

We confirm our full support for the allocation of the former Alcan site under H1(54), which is identified to deliver 925 dwellings (although the resolution for the site would allow up to 1,200 new homes).

Significant progress has already been made to allow Walters to start work on the site very soon. This support should however be read in parallel with our objections to other allocations within Policy H1.

H1(54) and H1(55) – Housing

Policy H1 is a key policy. Once all of the sources of housing are accounted for, a total of 11,622 new dwellings (including a 12% contingency) over the plan period (to 2026) is proposed. This is substantially more land than is required. If the most recent WG projection is used, land for a total of 7,500 new homes is required. If unchanged, Policy H1 provides for about 4,100 more than this or very nearly 55% more than the number required in WG’s most up to date projections.

It is clearly a decision for Council’s whether they decide to over or under provide for housing (against the most up to date projections). However this is a significant over provision and whilst there is some very brief explanation given in the plan, this neither recognises the scale of the difference nor explains the need for it. This is important because the Council has a number of sites with planning permission (or resolutions) that it wishes to bring forward for redevelopment and further unnecessary allocations (either because of type of land or location) could deflect attention away from these priorities. We know that the Council agrees with this basic proposition from earlier statements in the plan.

This is significant because there is a substantial allocation for new or additional greenfield sites, under Policy H1. This is at the Woodland Site, Ringland (H1(55) – 300 units). This site should be deleted from the plan as it is not needed and could have an adverse impact on the delivery of key previously developed sites including Jubilee Park. The impact on housing numbers would be minimal and deletion of this new greenfield site would therefore improve the performance of the plan (and the principles and sequence it wishes to follow) without threatening strategy at any level. Looking more positively at the terms of Policy H1, we can confirm our full support for the allocation of the Jubilee Park (former Alcan site) under H1(54), which is identified to deliver a significant number of dwellings within the plan period. The Council should have the confidence that Walters, who are highly experienced and have an excellent track record in reclaiming and redeveloping post industrial sites, are committed to the redevelopment of this site and can deliver early benefits, in the form of new housing, within the plan period. For the reasons described earlier in this letter, the plan should recognise that more housing can be delivered on the site. A total of 1,200 new homes on the site should be targeted, or it should be made clear that the 925 figure is not an upper limit.

In this light, our comments on, objections to or recommendations for Policy H1 are as follows:

a) To support H1(54)
b) To consider the introduction of a phasing dimension to the allocations
c) To delete allocation H1(55)
d) Or to reserve this site for release only if needed.

For the reasons described above, we object to the allocations at H1(55) or recommend that it is included as reserve sites only (to be called on should the other sequentially preferable sites fail in any way).

Speaking at Public Examination

It is important that the developers are represented at the examination in order to ensure that any discussion on housing numbers or new greenfield sites is informed fully.

---

Item Question: Soundness of LDP

Tick-box reply: No
13 13 Council Response

Support noted. A response to the cover letter can be found in 3520.L1.

Following representations at the Deposit LDP stage the housing requirement figure has been justified and increased from the proposed Welsh Government Population projections. There is scope for an authority to deviate from the WG population projections but this deviation is required to be well evidenced. The NLP assessment sets out this evidence base and illustrates that Newport, as one of the few areas in Wales with an anticipated population increase noted in the Census, is set to grow and reflects the Council’s policy aspiration for growth. It should be recognised that the majority of the sites (46 of 55) have planning permission or permission subject to a Section 106 agreement. This established supply with clear market intent illustrates not only that a growth strategy is appropriate but achievable.

It is considered that the Plan contains sufficient support for brownfield development. In terms of holding back greenfield sites it is unclear whether this type of approach could be achieved, particularly given that planning permissions for greenfield sites are already in place.
Representation Details
by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M

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Document: Revised LDP, p.70
Policy: H04
Summary: 30% figure should be a target.

Item Question | Representation Text
--- | ---
3 3 | New Policy Yes
10 10 | Soundness Test C2, CE2, CE4

This form should be read in conjunction with the covering letter submitted on behalf of Walters Land (Rogerstone) Limited, dated 26/07/13, which sets out the full background and justification for the representations.

Whilst the level of affordable housing will be examined as the plan progresses, it is recommended that the policy wording is amended to reflect the modern approach to affordable housing delivery. In this respect, the proposed 30% provision ought to be treated as a target figure – to allow for flexibility, should viability justify so, and policy or commentary explicitly allow for innovative forms of affordable housing, which may not meet the TAN 2 definition, but deliver some form of affordable housing (for example developer shared equality, low cost home ownership). The policy should also include the ability to deliver affordable housing off site, for example though contributions to improvements to existing and empty housing stock.

Policy H4 – Affordable Housing
Policy H4 provides further guidance on the affordable housing requirements. It sets out the need to include 30% affordable housing on sites of 0.33 hectares or 10 or more houses (in settlement boundaries) or 0.2 hectares or 3 or more houses (in village boundaries). Whilst the level of affordable housing will be examined as the plan progresses, it is recommended that the policy wording is amended to reflect the modern approach to affordable housing delivery. In this respect, the proposed 30% provision ought to be treated as a target figure – to allow for flexibility, should viability justify so, and policy or commentary explicitly allow for innovative forms of affordable housing, which may not meet the TAN 2 definition, but deliver some form of affordable housing (for example developer shared equality, low cost home ownership). The policy should also include the ability to deliver affordable housing off site, for example though contributions to improvements to existing and empty housing stock.

Item Question | Council Responses
--- | ---
12 12 | Speaking at Public Examination No
2 2 | Soundness of LDP | Tick-box reply No

There is a clearly evidenced percentage of need within Newport, which stands at 86%. The policy therefore requires 30% but allows for flexibility where viability can be taken into account. It is therefore not considered necessary to set out the required percentage as a target as the policy is inherently flexible. National Planning Policy sets out the definition of affordable housing, it is not appropriate for Local Planning Authorities to alter such definitions. The use of commuted sums to improve existing stock is used within Newport but is viewed an a method only to be used in exceptional circumstances because there is a real need for physical stock within development to provide mixed and balanced communities. Also there is a limited stock and high land value in certain areas of Newport which makes the application of commuted sums unviable.
Document: Revised LDP, p.81, para.(x)

Policy: EM02

Summary: Changes to Policy EM02

**Item Question**: Changes to Policy EM02

**Representation Text**: This form should be read in conjunction with the covering letter submitted on behalf of Walters Land (Rogerstone) Limited, dated 26/07/13, which sets out the full background and justification for the representations. The allocation on Novelis under H1 is adequate to bring the site forward for development. Whilst the scheme is undoubtedly a regeneration scheme, it does not need to be allocated under Policy EM2. As a consequence, the reference to Novelis under EM2(xii) should be deleted. Preferred Change sought: EM2(xii) should be deleted. Should the Council wish to retain reference to Novelis within Policy EM2, the reference under (xii) and the supporting text at paragraph 6.35 should make it clear that residential use is the predominant use for the site and the commercial, leisure and community uses are suitable additional uses but ultimately optional and interchangeable with each other.

**Change sought if EM2(xii) to be retained**: EM2(xii) changed to read – Novelis (former Alcan site), Rogerstone, 40ha for predominantly residential use with potential for ancillary B1, commercial, leisure and community uses.

Policy EM2 – Regeneration Site

Policy EM2(x) allocates the site as a ‘Regeneration Site’ for 40ha of B1, Commercial, Leisure, Residential and Community Uses.

Whilst the principle of allocating the site for regeneration purposes is supported, there is concern that the dual allocation of the site for residential use, under Policy H1, and business, commercial, leisure, residential and community uses, under EM2, dilutes the primary purpose of allocating the site for residential use. Consequently an objection is required. Further explanatory text, at paragraph 6.25 of the RDLDP, states that redevelopment of the site will require a masterplan approach and that a provision of a primary school will be required on site as part of the development. Reference is also made to the need for a flood consequences assessment and the potential for hydraulic modelling to be undertaken. This was all done as part of the outline planning application with the scheme including provision for a primary school to meet school places generated by the development. The concern is that the residential uses allocated under H1(54) do not take the priority that they should within the policy wording of EM2(x). The allocation on Novelis under H1 is adequate to bring the site forward for development. Whilst the scheme is undoubtedly a regeneration scheme, it does not need to be allocated under Policy EM2. As a consequence, the reference to Novelis under EM2(x) should be deleted. Preferred Change sought: EM2(x) should be deleted. Should the Council wish to retain reference to Novelis within Policy EM2, the reference under (x) and the supporting text at paragraph 6.25 should make it clear that residential use is the predominant use for the site and the commercial, leisure and community uses are suitable additional uses but ultimately optional and interchangeable with each other. Change sought if EM2(x) to be retained: EM2(x) changed to read – Novelis (former Alcan site), Rogerstone, 40ha for predominantly residential use with potential for ancillary B1, commercial, leisure and community uses.
### Representation Details

**Filtered to show:** (all of) Stage=L; Status=M

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Whilst the principle of allocating the site for regeneration purposes is supported, there is concern that the dual allocation of the site for residential use, under Policy H1, and business, commercial, leisure, residential and community uses, under EM2, dilutes the primary purpose of allocating the site for residential use. Consequently an objection is required.

**Item Question**

**Council Responses**

Agree to change description of site to ‘40ha for predominantly residential use with potential for ancillary B1, commercial, leisure and community uses’. The site will remain allocated as a regeneration site in order to provide the developer with sufficient flexibility (plus any future developers).

---

**3520.L9/(i)(d)/T01** Walters Land (Rogerstone) Limited Savills 25/07/2013 E C M

Document: Revised LDP, p.86, para.(i)(d)

Policy: T01

Summary: Support for railway station allocations.

---

**Item Question**

**Representation Text**

Policy T1(i)(d) includes proposals for a new railway station to be provided at Pye Corner, Basseleg. Walters fully support the proposals, which will greatly improve access to and choice of sustainable modes of travel for existing and new residents in the area.

Policy T1 – Railways

Policy T1(i)(d) includes proposals for a new railway station to be provided at Pye Corner, Basseleg. Walters fully support the proposals, which will greatly improve access to and choice of sustainable modes of travel for existing and new residents in the area.

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**Item Question**

**Council Responses**

Support noted.
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<td>Soundness Test</td>
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<tr>
<td></td>
<td>Change sought: reference required within the supporting text at paragraph 9.58 to the size of the primary school being directly related to the school places generated by the new development at the Novelis site.</td>
</tr>
<tr>
<td>11</td>
<td>Policy CF13 – School Sites</td>
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<td></td>
<td>Policy CF15 states that new or enlarged schools are required at, inter alia, (ii) former Novelis site, Rogerstone.</td>
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<td></td>
<td>Paragraph 9.54 refers to the former Novelis (Alcan) site as being identified as a regeneration site for a predominantly residential led development. It states that provision of a primary school will be required on site as part of this development. The size and function of the school should be fairly related to the number of houses generated by the redevelopment of the site. The provision of primary school places should be commensurate to the size of the development and the developer should not be required to provide for, or contribute to any school capacity/places that are not generated by the development. Change sought: reference required within the supporting text at paragraph 9.58 to the size of the primary school being directly related to the school places generated by the new development at the Novelis site.</td>
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<td>Council Response</td>
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<td>Such details would normally be worked out as part of an application/S.106 agreement. The supporting text refers to another policy (SP13) and SPG is considered sufficient.</td>
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<td>Item</td>
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<td>Representation</td>
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<td></td>
<td>Policy GP1 - General Development Principles - Climate Change</td>
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<td>Reference is made within Policy GP1(ii) to development proposals being designed to minimise energy requirements and incorporate appropriate renewable, low or zero carbon energy sources, including site energy provision, where possible. Whilst the aim to minimise energy requirements is supported, the provision of renewable, low or zero carbon energy sources within development sites is in its infancy and experience suggests that it is proving very difficult to find viable solutions for on site renewable energy production. The indication that on site energy provision should be made, where possible, should also include the caveat that it should also be viable and practical.</td>
</tr>
<tr>
<td></td>
<td>Change sought: change to GP1(ii) to read – Development proposals should: be designed to minimise energy requirements and incorporate appropriate renewable, low or zero carbon energy sources, including on site energy provision where viable and practical.</td>
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<td>It is not considered necessary to include ‘viable’, since the word ‘practicable’ is sufficiently broad to encompass physical and financial considerations.</td>
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### Document: Revised LDP, p.41, para.(ii)

**Policy: GP03**

**Summary:** Delete criteria (ii).

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</table>

**Policy GP3 – General Development Principles – Service Infrastructure**

Criteria (ii) of Policy GP3 refers to capacity within the public foul sewer system and effectively would prevent development where deficiencies exist or satisfactory improvements cannot be provided. Whilst it is correct that developments should be served by appropriate infrastructure, there is significant concern that the emphasis within Policy GP3 is on the advice of statutory undertakers in determining whether satisfactory infrastructure exists. The overriding concern in this respect is that planning applications could be held up due to protracted consultation exercises with statutory undertakers, which has been the case in the past. Effectively, progress and regeneration will depend on the responses from statutory undertakers. Where appropriate, technical reports support applications demonstrating acceptable service infrastructure, or solutions to provide upgrades and, therefore, the grant of planning permission should not be delayed, subject to appropriate and relevant conditions. Change sought: delete criteria (ii) of Policy GP3.

<table>
<thead>
<tr>
<th>Item</th>
<th>Question</th>
<th>Council Responses</th>
</tr>
</thead>
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<td>12 12</td>
<td>Speaking at Public Examination</td>
<td>No</td>
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**Council Response**

Consultation with statutory undertakers is an important part of the planning process. It is appropriate that development is only approved where essential infrastructure either exists or can be provided and therefore the Policy should not be amended as suggested.
## Document: Revised LDP, p.81

### Policy: EM02

**Summary:** Proposed mixed use site at Llanwern Station site.

**CANDIDATE SITE REPRESENTATIONS**

Llanwern Railway Station land

The land owner wishes to see the attached site included as a mixed residential/commercial/nature conservation site.

The extent of the site and its relationship with adjacent residential development is evident on the site location plan which also confirms the extent of the Applicant’s site.

The site affords the early provision of a ‘Park & Ride’ facility to serve the proposed Llanwern Railway Station.

Currently the station and related ‘Park & Ride’ car park is dependent on the construction of the north-south link road over the main Cardiff to London rail line. The construction of the north-south link road is in turn dependent on financial contributions from the consented residential development at Llanwern and the regeneration of the former Llanwern Steelworks site (EM2).

This mixed use scheme affords a unique opportunity to facilitate the early development of the new railway station by providing the ‘Park & Ride’ facility as part of a mixed residential/commercial facility at no cost to the community.

The suitability of the land to the west of Tennyson Avenue, Llanwern for residential development was recognised in the initial Draft East Newport Development Framework Plan ‘Going for Growth’ SPG published in 1994.

Whilst the later version of the SPG published in May 2007 omitted the site from the proposed land use framework, it is interesting to note neither the Ecological Constraints Plan (Fig. 6) nor the Northern Landscape Plan (Fig. 5) incorporated in the SPG didn’t identify any constraints which warranted its omission.

As the attached drawing AL(90)100 confirm, the scheme also affords the provision of a lagoon which will assist the sustainable drainage of the development whilst providing a valuable ecological facility and leisure facility for local residents.

**Representations**

**Representation Details**

<table>
<thead>
<tr>
<th>Rep'n/Para/Policy</th>
<th>Representor</th>
<th>Agent</th>
<th>Accession No</th>
<th>Date Lodged</th>
<th>Late?</th>
<th>Source</th>
<th>Type</th>
<th>Mode</th>
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<tr>
<td>3681.L1/EM02</td>
<td>George, Mr Michael</td>
<td>C2J Architects and Town Planners</td>
<td>26/07/2013</td>
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<td>O</td>
<td>M</td>
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Additional material submitted - Please click here
### Council Response

A transport Assessment will be required to confirm the effect of the development on the local highway network in term of capacity and safety from the SDR to the site. Station Road is not suitable for vehicular access. Public transport is infrequent, there is currently only one service which is financially supported by the Council operating an approximate frequency of every 2 hours between Newport and Caldicot. There is no bus stop in the vicinity with the bus turning in Tennyson Avenue picking passengers up on the road. The site is located within Parking Zone 6 but the site if developed is anticipated to be Zone 5. This is not a sustainable location for the proposed use.
### Natural Resources Wales

Document: Revised LDP, p.23

Policy: SP09

Summary: Cover letter, main representations set out within representations L2-149

<table>
<thead>
<tr>
<th>Item</th>
<th>Question</th>
<th>Representation Text</th>
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<td>C2, CE1, CE2, CE3</td>
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<tr>
<td>3683.L1//SP09</td>
<td>Natural Resources Wales</td>
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<td>26/07/2013</td>
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NRW welcomes the preparation of the Plan and the work that has been undertaken by your authority. We note and are generally supportive of the overall vision of your Plan, which has evolved to reflect the three core pillars of sustainability and their integration (environmental, social and economic), which is supported by a sustainable development strategy with a focus on the regeneration of brownfield sites. We particularly welcome the wide range of issues your Plan seeks to address including; minimising contributions towards and adapting to the effects of climate change; the protection and enhancement of biodiversity; managing the risks and consequences of flooding; and improving the way in which waste is managed. However we have concerns with regard to the lack of aspiration in the Plan’s vision for the natural environment.

We also welcome the Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) that have been undertaken for the Plan. A separate response has been submitted to you for each of those assessments. We are pleased that you have taken on board some of our previous advice and made some positive changes to the Revised Deposit Plan. However, although we welcome much of the Plan’s content we have serious concerns about parts of it and some of the contradictions within it, and consider that as drafted those parts fail to meet a number of the Tests of Soundness, most notably CE1, CE2 and C2.

We are particularly concerned about the number of allocations within or likely to have implications for the Gwent Levels suite of Sites of Special Scientific Interest (SSSIs) and/or within areas at risk of tidal and/or fluvial flooding, notably allocations:
- CF13(vii) – South of Percoed Lane, Duffryn,
- EM1(i) – Duffryn,
- EM1(ii) – East of Queensway Meadows,
- EM2 (vii) – Crindau Gateway,
- H16 (i)– Hartridge Farm,
- H50 – Herbert road,
the safeguarding of land for a ‘M4 Relief Road’ and a ‘Duffryn Link Road’.

The Wildlife and Countryside Act 1981, as amended, (translated into planning policy through Planning Policy Wales) places a duty on your authority to take reasonable steps consistent with the proper exercise of your functions, to further the conservation and enhancement of the features by reason of which a SSSI is of special interest. The loss of and damage to SSSIs resulting from LDP allocations, particularly when there appears to be alternative solutions elsewhere in the Plan area, is clearly contrary to that duty, and therefore contrary to national policy and Test of Soundness C2. We therefore advise that allocations likely to result in direct loss of, or that would fail to conserve and enhance a SSSI are deleted from the Plan.

Other key points of concern to NRW are:
- the lack of clarity relating to different features of nature conservation interest associated with Percoed Reen (SSSI, SAC and European Protected Species)
- issues with respect to proposed allocations within flood risk areas
- the failure to identify that not all brownfield sites will be suitable for development;
- the failure to incorporate some amendments agreed by the authority in the Report of all Representations at Deposit Plan Stage April 2012;
- the realistic delivery of the proposed level of housing growth;

More detailed comments are provided in the attached Annex. An LDP response form is also enclosed.

Given our concerns over the proposed allocations within the SSSIs, and the inaccurate guidance included in the Plan relating to the retention of habitat alongside the reens within the Gwent Levels SSSIs, and issues regarding allocations in flood risk areas, we would welcome discussion with your authority about these issues at the earliest opportunity.

We also recommend that you consider and discuss cross boundary issues with neighbouring authorities.
This representation, which serves as a summary of NRW's position, raises a number of issues in relation to specific sites and policies. A detailed response to each point has been attached to the relevant submission elsewhere in this document.

---

**Soundness Test**

- Objective 2 aims to improve the efficiency in the use of energy, waste and water; minimising, adapting to or mitigating the effects of climate change; and seeking to change travel behaviour.
- The previous objective relating to the natural and built environment has been divided (Objective 5 and 6), which is in accordance with recommendations of your SA (Main Report: Table 9.5 Assessment Results: Explanations and Recommendations (January 2010), component 5).
- Removal of employment allocation EM1(ii) from the Gwent Levels – Nash and Goldcliff SSSI.
- Updates to assessment indicator scores to reflect recommendations made previously by CCW.
### Representation Details

**Document:** Revised LDP, p.30  
**Policy:** SP16  
**Summary:** M4 Relief road, welcome inclusion of policy on air quality.

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<th>Representation Text</th>
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<td>10</td>
<td>Soundness Test</td>
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<td>Representation</td>
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While we appreciate that your LDP is unable to affect the activities of the M4 and the proposed M4 Relief Road, we are supportive of policies, which mitigate air quality effects locally such as planting schemes (page 125 of the main report of the SA). Your Plan also specifies Major Road Schemes (Strategic Policy SP16) and comments made in paragraph 2.59 explain the history of schemes relating to the M4.

The focus of the current scheme surrounds the 'M4 Corridor Around Newport' and we suggest that you contact the Welsh Government’s Transport Division for the latest information and any update on progress. As you are probably aware, on 26 June 2013 Edwina Hart, as the Welsh Government Minister for Economy, Science and Transport, made a written statement on the M4, in relation to work on a draft plan, which if implemented would lead to a new motorway alignment being constructed.

We would like to inform you that NRW are already building a good working relationship with the Welsh Government project team and their consultants. We will provide advisory, statutory and regulatory advice on the emerging proposals across our remit and on a range of environmental matters. We have already touched on some specific issues, including the presence of Docksway landfill, the suite of Gwent Levels Sites of Special Scientific Interest (SSSIs), River Usk Special Area of Conservation (SAC), flood risk and drainage.

<table>
<thead>
<tr>
<th>Item Question</th>
<th>Council Responses</th>
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<tbody>
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<td>12</td>
<td>Speaking at Public Examination Yes</td>
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<tr>
<td>13</td>
<td>Council Response</td>
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</table>

Support noted.
### Representation Details

**Document:** Revised LDP, p.23  
**Policy:** SP09  
**Summary:** Clarification as to the nature conservation features associated with Percoed Reen.

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<th>Item Question</th>
<th>Representation Text</th>
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<tbody>
<tr>
<td>10 Soundness Test</td>
<td>C2, CE1, CE2, CE3</td>
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</table>
| 11 Representation | Nature Conservation Features of Percoed Reen  
We draw your attention to a lack of clarity and some confusion in text throughout the Plan with respect to the nature conservation features associated with Percoed Reen and recommend that issues relating to the Gwent Levels SSSIs, otters as a feature of the River Usk SAC and otters as European Protected Species in their own right are addressed clearly. Otters are not a notified feature of any of the Gwent Levels SSSIs although they are known to be present on Percoed Reen, where they are likely to be an extension of the otter population of the River Usk SAC/SSSI where they are a notified feature of interest. |
| 12 Speaking at Public Examination | Yes |

### Council Responses

**Item Question**  
**Council Response**  
Policy GP05 makes specific reference to the various nature conservation designations within the authority, the Plan should be read as a whole.
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<th>Item Question</th>
<th>Representation Text</th>
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<tr>
<td>11 Representation</td>
<td>From an earlier Examination in Public (EIP) a Council was asked to correct any misleading references in the Plan that suggested that certain allocations had been made solely on the basis of extant planning permissions. Even if land has previous planning permission it must be questioned whether the land is suitable for allocation and is a realistic commitment in the LDP. Hence a proposed LDP option/site must be assessed appropriately against up to date environmental criteria and information, including water availability, suitability of wastewater infrastructure, risks and consequences of flooding. Currently, our view is that there does not appear to be evidence to demonstrate that some options (proposals and sites) being considered in your Preferred Strategy and ISAR are suitable for inclusion. Please refer to our detailed comments on specific allocations below.</td>
</tr>
<tr>
<td>13 Council Response</td>
<td>The development plan allocations within the LDP are considered appropriate and in line with the overall strategy of the Plan. Those sites with planning permission e.g. housing commitments, school sites etc have been identified in the Plan because of their current status as having planning permission. If the permission were to lapse within the LDP period such a site would need to be assessed against up to date policy and regulations.</td>
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</table>

Cross boundary communication is a part of the development plan process and has been undertaken by NCC.
### Representation Details

**Document:** Revised LDP, p.6  
**Policy:** Intro & Overview  
**Summary:** Generally supportive of Vision however suggest amendment to include ambition to protect and enhance natural environment.

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<th>Item Question</th>
<th>Representation Text</th>
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| 10 | Soundness Test  
| | C2, CE1, CE2, CE3 |
| 11 | Representation  
| | Paragraph 1.7: Vision of the Plan  
| | Overall, NRW is generally supportive of your Vision, which has evolved to reflect the three core pillars of sustainability and their integration (environmental, social and economic), which is supported by a sustainable development strategy with a focus on the regeneration of brownfield sites, including an area of land at Llanwern Steelworks. However, we do not consider that the reference to "communities living in harmony in a unique natural environment" provides a clear aspiration for the county’s natural heritage during the Plan period, and does not reflect the requirements of national policy set out in paragraph 3.3.1 of TAN 5 “to develop an ambitious vision for the environment of the Plan area”.  
| | We therefore recommend that the Plan’s vision is amended to include an ambition to both protect and enhance the county’s unique natural environment so that it more accurately reflects the key issues, objectives and policies that follow later in the Plan and to enable it to meet Test of Soundness C2. |

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<th>Item Question</th>
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| 12 | Speaking at Public Examination  
| | Yes |

### Council Responses

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<td>13</td>
<td>The vision for the LDP was agreed at the beginning of the process, and reflects the results of extensive consultation.</td>
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</table>
### Representation Details

**Document:** Revised LDP, p.6  
**Policy:** Intro & Overview  
**Summary:** Suggest amendment so that issues are considered in their wider context.

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<th>Item Question</th>
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<td>C2, CE1, CE2, CE3</td>
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<td>Representation</td>
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<td>Observation: Whilst we note the issues that face Newport and need to be addressed, it might have been more appropriate to confirm them in light of the national, regional and local context set out in paragraphs 1.38-1.51. As drafted it appears that they have been considered in isolation and without regard to the national, regional and local context.</td>
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<td>Speaking at Public Examination</td>
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<td>2</td>
<td>Soundness of LDP</td>
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### Council Responses

**Item Question**  
**Council Response**  
Since the wider context is addressed in paragraphs 1.38 – 1.51, it is reasonable for paragraphs 1.8 and 1.9 to address issues that are particular to Newport. The LDP has been drafted with full regard to the regional and national context.
### Natural Resources Wales

**Document:** Revised LDP, p.9  
**Policy:** Objective 01  
**Summary:** Consider Objective 1 meets test of soundness.

<table>
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<th>Item Question</th>
<th>Representation Text</th>
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<td>Soundness Test</td>
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<td>C2, CE1, CE2, CE3</td>
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<td>Representation</td>
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</table>
|               | Paragraph 1.21: Objectives  
|               | Objective 1 - Sustainable Use of Land  
|               | We consider that the objective meets Tests of Soundness C2 and CE1. |
| 12            | Speaking at Public Examination |
|               | Yes                 |

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<th>Item Question</th>
<th>Council Responses</th>
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<td>Support noted.</td>
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Document: Revised LDP, p.9  
Policy: Objective 02  
Summary: Suggest amended text for objective 2 - Climate Change to ensure impact of future flood risk is understood.

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<th>Item Question</th>
<th>Representation Text</th>
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<td>Soundness Test C2, CE1, CE2, CE3</td>
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</table>
| 11 | Objective 2 - Climate Change  
Paragraph 1.26  
We request that in order to meet Test of Soundness C1, the text contained in paragraph 1.26 is amended to read as follows;  
“Although the City sits astride a river with a large tidal range, the risks and consequences of flooding are well understood. Recent developments, especially on the east bank of the Usk, have contributed to improving the flood risks to existing development either by being built at higher ground levels than previous uses on the sites, or by being within an area afforded alleviation by the land form. However, climate change continues to pose significant challenges”.

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<th>Item Question</th>
<th>Council Responses</th>
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<td>Speaking at Public Examination Yes</td>
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</table>
| 13 | Council Response  
It is felt that the proposed reference to land form would increase neither the clarity nor the effectiveness of the paragraph. Consequently, it is unclear how the paragraph would fail to comply with Test of Soundness C1 in its current form.
Document: Revised LDP, p.10
Policy: Objective 03
Summary: Consider the objective meets the test of soundness.

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<th>Item Question</th>
<th>Representation Text</th>
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<td>11 11</td>
<td>Representation</td>
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<td>Objective 3 - Economic Growth; Objective 4 - Housing</td>
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<td>We consider that the objectives meet Tests of Soundness CE1 and C2.</td>
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<td>12 12</td>
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<td>Council Response</td>
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<td>Support noted.</td>
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Natural Resources Wales
In terms of homes, we recognise that your Plan makes sufficient land available for a total of 10,350 new dwellings from 2011 to 2026. The Plan identifies a housing supply of 11,622 units, allowing for 12% flexibility. Provision will be of high quality in primarily previously developed land, which may lead to beneficial remediation of land affected by contamination. Such provision is also intended creating a sense of community and benefits in deprived areas.

Please also see our comments to SP10 in relation to the proposed level of housing growth. In terms of employment, an additional 74,000 jobs will be created over the Plan period and your Plan (through Policy SP17) makes provision for approximately 168 ha of employment land for the period 2011-2026. This exceeds your minimum requirement of 35ha, again allowing for flexibility as a result of future needs, to promote growth, offset any unforeseen stock losses and take account of constrained sites. As part of this assessment, you have identified that Newport requires a minimum of 21.5 hectares of employment land for specifically Class B uses (offices, industrial and warehousing). Comments made in paragraph 6.5 broadly describes the range of land allocations, that is, office development supported at City Centre Locations and Celtic Springs Business Park, heavier industry suited to locations south of Llanwern and east of Queensway Meadows and medium sized prestige business park development at Duffryn, and units for distribution at Gwent Europark.

With regard to waste provision Class B2 employment sites are seen as possible locations, however, we request clarity on a number of aspects and detail is given below in relation to the relevant allocations.

Council Response

Comprehensive responses to the issues raised will be attached to the relevant policies.
### Representation Details

**Document:** Revised LDP, p.11  
**Policy:** Objective 05  
**Summary:** Consider that the objective meets the test of soundness.

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<th>Representation Text</th>
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<td>Soundness Test C2, CE1, CE2, CE3</td>
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<td>11</td>
<td>Representation Objective 5 – Conservation of the Built Environment We consider that the objective meets Tests of Soundness CE1 and CE2.</td>
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<td>Speaking at Public Examination Yes</td>
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<td>Council Response Support noted.</td>
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**Agent:** Natural Resources Wales  
**Accession No:** 3683.L13/Objecti  
**Date Lodged:** 26/07/2013  
**Late:** E  
**Source:** S  
**Type:** I  
**Mode:** M  
**Status:**
### Representation Details

**Document:** Revised LDP, p.11  
**Policy:** Objective 06

**Summary:** Suggest provision of a definition of the term 'protected habitats';.

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<th>Item Question</th>
<th>Representation Text</th>
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We welcome the inclusion of an objective to protect and enhance the natural environment. However to clarify what is meant by "protected habitats", we recommend that a definition is included in the supporting text to Objective 6, or in the glossary of the Plan.

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<th>Council Responses</th>
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<td>12 Speaking at Public Examination</td>
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**Soundness Test**: C2, CE1, CE2, CE3

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<td>2 Soundness of LDP</td>
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</table>

This issue is addressed in the supporting text of Policy GP5 and in TAN 5. It is not necessary to change the wording of Objective 6 or to expand the glossary.
# Representation Details

**Document:** Revised LDP, p.11  
**Policy:** Objective 07  
**Summary:** Consider that the objective meets the test of soundness.

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<td>10</td>
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<td>Speaking at Public Examination</td>
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- **Soundness Test (C2, CE1, CE2, CE3)**  
- **Objective 7 – Community Facilities and Infrastructure;** We consider that the objectives meet Tests of Soundness CE1 and C2.

## Council Responses

- **Support noted.**

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**Accession No:** 3683.L15//Objecti  
**Agent:** Natural Resources Wales  
**Date Lodged:** 26/07/2013  
**Source:** E  
**Type:** S  
**Mode:** I  
**Status:** M  
**Status Modified:** 12/02/2014
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<td>Objective 8 – Culture and Accessibility; We consider that the objectives meet Tests of Soundness CE1 and C2.</td>
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**Item Question**

**Tick-box reply**

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<td>11 11</td>
<td>Representation Objective 9 – Health and Well-being; We consider that the objectives meet Tests of Soundness CE1 and C2.</td>
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**Representation Details**

Document: Revised LDP, p.12
Policy: Objective 10

Summary: Consider the objective meets the Tests of Soundness

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<td>Objective 10 - Waste We consider that the objectives meet Tests of Soundness CE1 and C2.</td>
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**Council Responses**

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**Accession No**: 3683.L18//Objecti
**Agent**: Natural Resources Wales
**Date Lodged**: 26/07/2013
**Status**: M
### Representation Details

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Document: Revised LDP, p.1.556

Policy: Intro & Overview

Summary: Welcome that the Plan provides clarification that it should be read as a whole.

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<tr>
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<tr>
<td>11 11</td>
<td>Representation</td>
</tr>
<tr>
<td></td>
<td>Paragraph 1.55 We welcome the clarification that the Plan should be read as a whole, and the need to consider national planning policy and guidance.</td>
</tr>
<tr>
<td>12 12</td>
<td>Speaking at Public Examination</td>
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<tr>
<td>11</td>
<td>Representation</td>
</tr>
<tr>
<td></td>
<td>Paragraph 2.2 – Spatial Strategy</td>
</tr>
<tr>
<td></td>
<td>We welcome the inclusion of the protection of the landscape, conservation of protected sites and species and encouragement of biodiversity as part of the Plan’s spatial strategy, and consider that this meets Test of Soundness C2.</td>
</tr>
<tr>
<td>12</td>
<td>Speaking at Public Examination</td>
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</tbody>
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<td>13</td>
<td>Council Response</td>
</tr>
<tr>
<td></td>
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</tbody>
</table>

**Summary:** Welcome inclusion of text for the protection of biodiversity and consider it meets the test of soundness.
### Representation Details

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**Document:** Revised LDP, p.16  
**Policy:** SP01  
**Summary:** Recommend reinstating opening paragraph as set out in Deposit version of the Plan.

### Soundness Test

<table>
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<th>Item</th>
<th>Question</th>
<th>Representation Text</th>
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<tbody>
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</tr>
<tr>
<td>11</td>
<td>Representation</td>
<td>SP1 Sustainability</td>
</tr>
</tbody>
</table>

Although we welcome the encouragement to locate developments on brownfield land within their settlement boundary, not all brownfield land will be suitable for development and not all development proposals that come forward during the plan period will be proposed to be located on brownfield land within their settlement boundary. Such proposals will therefore immediately be in conflict with the opening paragraph of this strategic policy.

To overcome such conflict we recommend that the opening paragraph to SP1 proposed in the April 2012 version of the Deposit Plan is reinstated. (To meet Tests of Soundness CE1 and CE2).

### Speaking at Public Examination

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<tr>
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<th>Question</th>
<th>Answer</th>
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### Soundness of LDP

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### Council Responses

<table>
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<tr>
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<th>Question</th>
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<tbody>
<tr>
<td>13</td>
<td>Council Response</td>
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</tbody>
</table>

It is unclear as to which paragraph is being referred to, however, if it is paragraphs 2.2, 2.3 and 2.4 of the Deposit Plan (April 2012), these have been moved to Chapter 1 of the Revised Deposit Plan (June 2013) under Structure of the Plan – paragraphs 1.55 onwards.

Paragraph 2.7 of the Deposit Plan (the first paragraph in support of Policy SP01) is the same as paragraph 2.4 of the Revised Deposit Plan (June 2013).
**Representing Details**

- **Rep'n/Para/Policy**: 3683.L22/2.5/SP01
- **Representor**: Natural Resources Wales
- **Document**: Revised LDP, p.16, para.2.5
- **Policy**: SP01
- **Summary**: See representation 3683.L9.

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<td>C2, CE1, CE2, CE3</td>
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<td>11 11</td>
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<tr>
<td></td>
<td>Paragraph 2.5</td>
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<td>Please see comments to paragraph 1.22 above.</td>
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<tr>
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<td>Speaking at Public Examination</td>
</tr>
<tr>
<td>2 2</td>
<td>Soundness of LDP</td>
</tr>
</tbody>
</table>

**Council Responses**

- **Council Response**: The importance of ecology in Newport is noted throughout the Plan and with specific reference to brownfield sites at paragraph 2.72, and 4.36. The point is therefore considered to be adequately covered.
<table>
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<tr>
<th>Item</th>
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<td>10</td>
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<tr>
<td></td>
<td>SP2 Health</td>
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<tr>
<td></td>
<td>We consider that the policy meets Tests of Soundness CE1 and C2.</td>
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**Council Response**
Comments noted.
**Representation Details**

**by:** (No grouping)  
**Filtered to show:** (all of) Stage=L; Status=M

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</table>

**Document:** Revised LDP, p.19  
**Policy:** SP03  
**Summary:** Supportive of Policy SP3 Flood Risk, highlight the issue for resilience and resistance in flood risk areas.

**Item Question**  
**Representation Text**

10  
**Soundness Test**  
C2, CE1, CE2, CE3

11  
**Representation**  
SP3 Flood Risk

NRW is supportive of Strategic Policy, SP3 on Flood Risk and the reasoned justification contained in paragraphs 2.16-2.18. Justification given in paragraph 2.18 comments that "There is a clear requirement to address the issue of flood risk and flood resilience in developments. The Plan sets out its approach to flood risk in Policy GP1: Climate Change". Subsequently, comments made in paragraph 3.4 also make reference to resilience. This Policy and the reasoned justification are welcomed by us and we consider the policy meets Test of Soundness C2. We also provide the following advice on resistance and resilience measures;

Our NRW view is that resistance1 and resilience2 measures will not result in the development as being designed flood free (physically). The implementation of such measures is unlikely to ensure compliance with the success criteria outlined in Technical 1 Resistance measures help stop flood water getting in to a property, such as removable flood boards and barriers, airbrick covers, sandbags or non-return valves to drains and pipes. 2 Resilience measures help minimise the damage flood water can cause if it does get in to property, such as tiled floors, lime plaster for walls, or raised plug sockets.

Advice Note 15 Development and Flood Risk (July 2004). Resistance and resilience measures seek to manage the risks but do not reduce or eliminate the risks of flooding completely. Resistance measures are only considered appropriate for depths of flooding of no greater than 600mm. Human intervention provides uncertainty to the successful implementation of resistance measures, for example, installation of a flood gate by a householder. We are concerned that such risk management measures cannot be guaranteed. Resilience measures are considered where maximum flood depths exceed 600mm.

In addition, development should be designed to minimise structural damage during a flooding event and also flood proofed to enable it to be returned to its prime use quickly in the aftermath of the flood. This could be aided by resistance and resilience measures.

We also suggest that the Local Planning Authority consider how these aspects can be suitably controlled in a planning decision.

12  
**Speaking at Public Examination**  
Yes

**Item Question**  
**Tick-box reply**

2  
**Soundness of LDP**  
No

**Item Question**  
**Council Responses**
It is considered for consistency that the term Resistance is added to paragraph 2.18 in order to reflect the widely acknowledged process of flood mitigation, resilience and resistance measures. Planning aims to direct development away from areas of high flood risk but cannot insist that a development is designed so that structural damage is minimal. It can advise on designing in resilience and resistance measures as the policy wording reflects.
### Item Question | Representation Text
--- | ---
10 | Soundness Test C2, CE1, CE2, CE3
11 | Representation SP4 Water Resources

NRW seeks the enhancement of water quality through Policy SP4 Water Resources, in accordance with the Water Framework Directive 2000 (WFD) and comments made in your Sustainability Appraisal (SA – Table 5.1 Key Sustainability Issues and Opportunities). We therefore request the following amendment to criterion SP4 (iv) (the inserted text is underlined) in order to meet Test of Soundness C1.

**Development Proposals Should Minimise Water Consumption, Protect Water Quality During and After Construction and Result in No Net Increase in Surface Water Run-Off Through the Sustainable Management of Water Resources By:**

iv) **Ensuring Development is Appropriately Located and Phased So That There is Capacity in the Waste Water, Sewerage and Water Supply As Well As the Protection and Enhancement of Water Quality.**

Overall, NRW are supportive of Strategic Policy, SP4 on Water Resources and the reasoned justification (contained in paragraphs 2.19-2.20). This support is offered, given the focus on water management; water as a resource (for supply, for consumption and protection); its management (surface water runoff); availability of suitable infrastructure and treatment of wastewater.

12 | Speaking at Public Examination Yes

--- | ---
2 | Soundness of LDP No

--- | ---
13 | Council Response

Support is noted. It is considered that the plan seeks to protect water quality and ensure that in compliance with the Water Framework Directive that we do not deteriorate the water quality in the area. The suggested change to require developers to enhance water quality is desirable, but is considered to be overly onerous.
### Representation Details

**Rep'n/Para/Policy** | **Representor** | **Agent** | **Accession No** | **Date Lodged** | **Late?** | **Source** | **Type** | **Mode** | **Status** | **Status Modified**
--- | --- | --- | --- | --- | --- | --- | --- | --- | --- | ---
3683.L26//SP05 | Natural Resources Wales |  |  | 26/07/2013 | | | | | | 

Document: Revised LDP, p.21  
Policy: SP05  
Summary: Consider the Policy meets the test of soundness.

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<td>SP5 Countryside</td>
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**Council Response**

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<tr>
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<td>Representation</td>
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<tr>
<td></td>
<td>SP6 Green Belt We support the principle of identifying a Green Belt and Green Wedges to prevent the coalescence of settlements, and consider that they reflect a logical flow from Objectives 1, 5, and 6 of the Plan in meeting Test of Soundness CE1.</td>
</tr>
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<td>12</td>
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**Tick-box reply**

| Item Question | Soundness of LDP | No |

**Council Responses**

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**Item Question** Council Responses

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**Item Question** Council Responses

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<td>SP8 Special Landscape Areas</td>
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<td>We welcome the designation of SLAs and consider they meet Tests of Soundness CE1 and C2.</td>
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### Natural Resources Wales

Document: Revised LDP, p.22
Policy: SP08

Summary: Welcome designation of Special Landscape Areas and consider policy meets test of soundness.

- **C2, CE1, CE2, CE3**

- **Support noted.**

**Council Response**

Support noted.
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<th>Question</th>
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<td>SP9 Conservation of the Natural, Historic and Built Environment</td>
</tr>
<tr>
<td></td>
<td></td>
<td>We welcome the policy and consider that it meets Tests of Soundness CE1 and C2.</td>
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<tr>
<td>12</td>
<td>Speaking at Public Examination</td>
<td>Yes</td>
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**Council Responses**

| 13   | Council Response | Support noted. |

Document: Revised LDP, p.23
Policy: SP09
Summary: Consider that the Policy meets the test of soundness.
### Representation Details

**by:** (No grouping)  
**Filtered to show:** (all of) Stage=L; Status=M

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**Document:** Revised LDP, p.24  
**Policy:** SP10

**Summary:** Concerns over the deliverability of the housing supply.

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<th>Representation Text</th>
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<tbody>
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<td>10</td>
<td>Soundness Test C2, CE1, CE2, CE3</td>
</tr>
<tr>
<td>11</td>
<td>Representation SP10 House Building Requirement The proposed level of housing growth will require an annual average completion rate of 774 units, which is significantly higher than historic completion rates identified in the Assessment of Housing Requirements (February 2013). Given the continuing uncertainty regarding the economic climate and its impact on the housing market, we therefore have concerns regarding the realistic delivery of the proposed level of housing provision, and suggest that to meet Test of Soundness CE2 the Plan includes contingency mechanisms, should it become evident that housing figures and the aims of the policy are not being delivered.</td>
</tr>
<tr>
<td>12</td>
<td>Speaking at Public Examination</td>
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**Item Question**  
**Council Responses**

<table>
<thead>
<tr>
<th>Item Question</th>
<th>Council Response</th>
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<tbody>
<tr>
<td>13</td>
<td>The annual housing requirement for the plan period is 690 units per year, the LDP strategy is aiming for growth and the housing supply within the plan is set to provide the number of units required within the plan period as set out in the delivery and implementation background paper 2013. There are adequate monitoring processes in place to ensure this key element of the LDP strategy is being met.</td>
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<td>Representation Details</td>
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<td>3683.L32//SP11</td>
<td>Natural Resources Wales</td>
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Document: Revised LDP, p.25  
Policy: SP11  
Summary: Require the Plan to provide a statement for clarification as to the chosen boundary of the Eastern Expansion Area.

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<td>11 11</td>
<td>Representation</td>
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<td></td>
<td>SP11 Eastern Expansion Area</td>
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As indicated in our previous response to the Deposit Plan, we recommend, for improved clarity, that the Plan and the Proposals Map should clearly identify the full boundary of the Eastern Expansion Area. If the boundary has been amended from that identified in the UDP and East Newport Development Framework Plan, to assist users of the Plan it would be useful if the Plan provided a statement clarifying the changes. (To meet Test of Soundness CE1).

| 12 12         | Speaking at Public Examination |

<table>
<thead>
<tr>
<th>Item Question</th>
<th>Council Responses</th>
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The policy text of SP11 will be amended to provide clarity as to the extent of the Eastern Expansion Area.
**Representation Details**

**Document:** Revised LDP, p.26  
**Policy:** SP12  
**Summary:** Consider that the Policy meets the test of soundness.

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<tr>
<th>Item Question</th>
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<td></td>
<td>SP12 Community Facilities and Requirements;</td>
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<td>We consider that the policies meet Test of</td>
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**Item Question**  
**Tick-box reply**

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**Accession No:** 3683.L33//SP12  
**Agent:** Natural Resources Wales

**Date Lodged:** 26/07/2013  
**Status:** E S I M
# Soundness Test

**C2, CE1, CE2, CE3**

---

## Representation

- **SP13 Planning Obligations;**
  - We consider that the policies meet the Test of Soundness CE1.

---

## Council Responses

- **Comments noted.**

Item Question | Representation Text
---|---
10 | Soundness Test C2, CE1, CE2, CE3
11 | Representation
   SP14 Transport Proposals;
   We consider that the policies meet Test of Soundness CE1.
12 | Speaking at Public Examination
   Yes

Item Question | Council Responses
---|---
13 | Council Response
   Support noted.
<table>
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<th>Item</th>
<th>Question</th>
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| 11   | Representation | SP15 Integrated Transport  
We consider that the policies meet Test of Soundness CE1. |
| 12   | Speaking at Public Examination | Yes |

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**Representation Details**

**Document:** Revised LDP, p.30

**Policy:** SP16

**Summary:** Require clear justification where a proposal affects a SSSI, propose deletion of Duffryn Link Road and clarify that these developments avoid adverse effects.

**Item Question**

**10** Soundness Test

**11** Representation

**SP16 Major Road Schemes**

We remind you that section 28C(2) of the Wildlife and Countryside Act 1981 as amended, requires public bodies to take reasonable steps to further the conservation and enhancement of the features for which the site is of special interest. Clear justification will therefore be required with respect of any transport proposals affecting SSSIs within the Gwent Levels, with details of how it is proposed to avoid and mitigate such impacts. If as a last resort it is considered that there is no alternative route for the proposed road schemes and that there is national justification for damage to the SSSIs, compensation measures will be required.

Given that the Duffryn link Road is not identified in the Wales Infrastructure Investment Plan or in either the national or regional transport plans, we question whether its delivery during the Plan period is realistic. If its delivery within this period is unlikely, we recommend that it is deleted from the Plan. (To meet Test of Soundness CE2.)

SP16(i) Although we welcome the reference to Policy GP5 in paragraph 2.52 for guidance on developments in the Gwent Levels, because of the juxtaposition of the Junction 28 Interchange scheme and the Gwent Levels - St Brides SSSI, we recommend that paragraph 2.52 or policy GP5, is amended to clarify that the dock feeder which provides water to the Gwent Levels - St. Brides SSSI will need to be protected during the construction and operational period of the scheme to protect the water quality entering the SSSI at this location.

SP16(iii) NRW has serious concerns in relation to a western extension of the southern distributor road which is located within, and has the potential to have adverse effects on, the Gwent Levels - St Brides SSSI. The road also abuts the boundary of the Gwent Levels Landscape of Outstanding Historic Interest in Wales (LOHIW), where unless designed with great care, similarly has the potential to have adverse effects on the nationally important landscape. We therefore recommend that the road is deleted from the Plan. If it is decided to retain the road scheme in the Plan, we recommend that paragraphs 2.55 and 2.56 are amended to clarify that development will need to avoid and where that is not possible demonstrate how any adverse impacts on the SSSI and the LOHIW are to be mitigated and or compensated for. (To meet Tests of Soundness C2 and CE2.)

Having raised these points previously, at the Deposit Plan stage April 2012 (see CCW letter of 13 June 2012), we note the response of NCC in the 'Report of All Representations' that Policy GP5 "outlines what will be required of developers when dealing with sites on the SSSI". However, we note no reference is made to the former CCW’s guidance note: Nature Conservation and Physical Development on the Gwent Levels, and strongly recommend that this is included.

2.16 (v) Given the potential for habitat fragmentation from development at ‘SP16(v) – North South Link Llanwern’, we recommend that the plan should clarify that the scheme will need to avoid adverse effects such as fragmentation, and demonstrate how potential impacts will be mitigated.

**Item Question**

**2 12** Speaking at Public Examination

**Tick-box reply**

**Yes**
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<th>Item</th>
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<th>Council Response</th>
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| 13   |          | The Duffryn Link will serve a similar function in the west to the Queensway route in the east, providing relief for the M4, including Junction 28 (Tredegar Park), at times of peak congestion and for incident management. The road also serves the major employment areas of south west Newport and the proposed railway station at Coedkernew, again providing opportunities for park and ride. The SDR extension proposals are one of the consulted upon M4 relief Road options. They are economically crucial to the growth of Newport Therefore it is considered appropriate to retain the allocation for the road within the Local Development Plan.  
Comments re SP16 (i) – Para 2.52 relates to Policy SP16 not Policy GP05. Policy GP5 outlines what would be required of developers and the Plan should be read as a whole. Comments re SP16 (iii) - Will be dealt with as part of any subsequent planning application. Policy GP 5 outlines what will be required of developers when dealing with sites on SSSI. The Plan should be read as a whole.  
SP16 (v) - Before any development gains planning permission the Council will need to be satisfied that any negative implications will be mitigated accordingly. Policy GP5 outlines what would be required of developers and the Plan should be read as a whole. |
**Representation Details**

**Document:** Revised LDP, p.30, para.2.56

**Policy:** SP16

**Summary:** Clarify ecological significance of Percoed Reen and buffer zone required for reens.

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**Paragraph 2.56**

We strongly recommend that, for reasons of clarity, the natural heritage interest of Percoed Reen and its locality is specified in the text. Percoed Reen forms part of the Gwent Levels - St Brides SSSI. It is also known to support commuting otters as the reen and riparian habitats connect with the River Usk SAC. Otters are a feature of the River Usk SAC as well as being European Protected Species in their own right. We therefore recommend that the advice provided in paragraph 2.56 clearly identifies which features of interest it relates to.

Whilst we welcome the principle of including provisions in the Plan for development proposals to retain bankside habitat either side of Percoed reen, it is not clear on what basis the 5m figure proposed in the Plan has been identified. Guidance by the former CCW, Nature Conservation and Physical Development on the Gwent Levels, recommends a minimum provision of 7m alongside field ditches, and 12m alongside reens to safeguard the special interest of the SSSI. We would welcome further discussion on this matter, and to meet test of soundness CE2 recommend that the Plan is amended to more accurately reflect the guidance prepared by the former CCW (as adopted by NRW). Also, please note that the reference to paragraph 2.15 is incorrect.

Further whilst we welcome the reference to otters in Paragraph 2.56, it is more likely that a licence under Regulation 53 of the Conservation of Habitats and Species Regulations 2010 (as amended), i.e. Licences for certain activities relating to animals or plants, will be required rather than a Habitat Regulations Assessment (HRA) under Regulation 61, Assessment of Implications for European sites. We recommend that the text is amended accordingly. (To meet Tests of Soundness C2 and CE2.)

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**Council Response**

In relation to the comments regarding the natural heritage interest of Percoed Reen and the licenses required under Regulation 53 of the Conservation of Habitats and Species Regulations 2010, Policy GP05 contains detail regarding these specific issues, the Plan should be read as a whole. In relation to the figure given regarding buffer zones adjacent ditches and reens, the figure relates to the minimum sized buffer for habitat purposes. There may be a need for a larger buffer for maintenance and management, and that is set out in para 2.16 of the Plan.
### Representation Details

**Document:** Revised LDP, p.32  
**Policy:** SP17  
**Summary:** Identified land supply is realistic and meets test of soundness.

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| 11   | Representation | SP 17 Employment Land Requirements  
Given historic take-up levels, we consider that the identified employment land requirement(168ha) is realistic and therefore meets Test of Soundness CE2. Please also see our comments below to Policy EM3. |

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</table>
**Item Question**  Soundness Test  
C2, CE1, CE2, CE3  

**Item Question**  Representation  
SP18 Employment Sites  
We welcome the changes to the employment land allocations in particular removing areas of the Gwent Levels - St Brides SSSI and the Gwent Levels – Nash and Goldcliff SSSI from allocations. However, we still have serious concerns about the allocation of SSSI for employment purposes which we consider to be contrary to national policy and Tests of Soundness CE1, CE2 and C2. Please see our comments below to Policies EM1 and EM3.

**Item Question**  Speaking at Public Examination  
Yes

**Item Question**  Council Responses  
As acknowledged, large areas of employment land which fell within SSSI have been removed from the Plan. However, some areas still exist. The Council has to strike a balance between promoting economic growth and preserving environmental landscapes and this is what we believe has been achieved. With regard to employment land allocations still within SSSI, the Council will expect developers to provide sufficient mitigation to minimise the disruption to flora and fauna in these areas. This is clearly set out within the Plan.
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<td>Revised LDP, p.33, para.2.67</td>
<td>SP18</td>
<td>Clarify which SSSI is affected by what allocation.</td>
<td>10 10 Soundness Test C2, CE1, CE2, CE3</td>
<td>Although we note the reference to the SSSI, the text should be amended to more clearly state which SSSI. We therefore recommend that the Plan state ‘development proposals will be required to demonstrate how any potential adverse impacts on the Gwent Level - St Brides SSSI and the Gwent Levels - Nash and Goldcliff SSSI have been avoided or mitigated, to meet Test of Soundness CE2.</td>
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<td>12 12</td>
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<td>Yes</td>
<td>Soundness of LDP</td>
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<td>13 13</td>
<td>Council Response</td>
<td>Council Responses</td>
<td>The mention of the SSSI is considered sufficient and it is not necessary to distinguish between the different SSSIs in a strategic policy.</td>
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<td>Representation Paragraph 2.69 Although we welcome the references to the River Usk SAC, the Severn Estuary SPA and the reens, which are part of the Gwent Levels: Nash and Goldcliff SSSI, as drafted there appears to be some confusion between the legislative requirements associated with the Conservation of Habitats and Species Regulations in respect of European designations and the Wildlife and Countryside Act in respect of SSSIs. We would therefore welcome discussions with you to resolve and clarify this matter. Reference to paragraph 2.55 in the text should be amended to read 2.56</td>
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<td>Speaking at Public Examination Yes</td>
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<td>Council Response Reference to paragraph 2.55 in the text will be amended to read 2.56. To ensure that there is no confusion between the separate legislative requirements for European protected sites and nationally protected sites Paragraph 2.39 will be amended to read: In addition to the potential impact on the River Usk Special Area of Conservation (SAC), developments must consider their potential impact on the Severn Estuary Natura 2000 sites. The extent of bird activity, that are features of the Severn Estuary Special Protecting Area (SPA) and Ramsar site, is unknown. Therefore developers will be responsible for carrying out a suitable bird survey to determine likely significant effects, if any. A sensitive working programme must be compiled to minimise disturbance to this species. The developer will be expected to provide sufficient information to enable a Habitat Regulation Assessment of these works to be carried out as part of the planning process. Employment Sites may also result in the loss of habitat (and disturbance of adjacent habitats) in particular it may impact upon Reens and therefore SSSI designations. Paragraph 2.55 sets out how this will need to be addressed. More information can be found in Policy GP5.</td>
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12/02/2014
**Representation Details**

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**Document:** Revised LDP, p.34  
**Policy:** SP19  
**Summary:** Consider the policy meets the test of soundness.

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We consider that the policy meets Test of Soundness CE1, and welcome the clarification provided in 2.72 that ecological surveys, mitigation, and management will be required where appropriate. We also refer you to our comments on flood resistance and resilience measures provided under heading SP3 above.

<table>
<thead>
<tr>
<th>Item Question</th>
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**Council Response**

Noted
### Item Question: Soundness Test

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### Item Question: Representation

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<td>We consider that this policy meets Tests of Soundness C2 and CE1.</td>
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### Item Question: Speaking at Public Examination

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### Council Responses

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Support noted.
Document: Revised LDP, p.36
Policy: SP21
Summary: Supportive use of Site Waste Management Plans and consider the policy meets the test of soundness.

10 Soundness Test
   C2, CE1, CE2, CE3

11 Representation
   SP 21 Waste Management
   Paragraph 2.79
   We are supportive of the production of Site Waste Management Plans (SWMP) to encourage resource efficiency and to reduce, recycle and re-use waste on site and as sustainably as possible. We consider that this policy meets Tests of Soundness C2 and CE1.

12 Speaking at Public Examination
   Yes

2 Soundness of LDP
   No

13 Council Response
   Support noted.
### Representation Details

**Document:** Revised LDP, p.36  
**Policy:** SP22  
**Summary:** Consider the policy meets the tests of soundness.

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| 11   | Representation | SP22 Minerals  
We consider that this policy meets Tests of Soundness C2 and CE1. |
| 12   | Speaking at Public Examination | Yes |

**Item Question**  
**Council Responses**  
**Noted.**

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12/02/2014
### Representation Details

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**Document:** Revised LDP, p.39

**Policy:** GP01

**Summary:** Welcome clarification that GP policies should be read as a whole.

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<td>Representation General Policies</td>
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<td>We welcome the clarification that General Development Principle Policies should be read as a whole.</td>
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</table>
Representations Details

Document: Revised LDP, p.39

Policy: GP01

Summary: Support policy and reference to lifetime of development.

---

10 10 Soundness Test

C2, CE1, CE2, CE3

---

11 11 Representation

GP1 General Development Principles – Climate Change

Paragraph 3.6

We are supportive of the reasoned justification given in paragraph 3.6, “The impact of climate change and sea level rise will require continued and improved flood risk management schemes. Developments must reflect a lifetime appropriate standard of design. In the case of residential development 100 years is required and for employment and industrial development 75 years”.

As part of the flood consequence assessment (FCA) process, the period over which climate change is considered needs to be specified. This is commonly known as the ‘lifetime of development’. NRW will recommend the following timescales are used in an applicant’s

FCA:
- Residential dwellings – 100 years (fits within the current PAG and is supported by the PPS25 Practice Guide, Paragraph 3.88),
- All other development types – 75 years (fits within the current PAG). Please also see our comments on Policy SP3 above with respect to flood resistance and resilience measures.

We consider that this policy meets Test of Soundness CE1.

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12 12 Speaking at Public Examination

Yes

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Item Question

Council Responses

Support noted.
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<tr>
<th>Item</th>
<th>Question</th>
<th>Representation Text</th>
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<tbody>
<tr>
<td>10</td>
<td>Soundness Test</td>
<td>C2, CE1, CE2, CE3</td>
</tr>
<tr>
<td>11</td>
<td>Representation</td>
<td>GP2 General Development Principles – General Amenity</td>
</tr>
<tr>
<td></td>
<td></td>
<td>We consider that this policy meets Test of Soundness CE1.</td>
</tr>
<tr>
<td>12</td>
<td>Speaking at Public Examination</td>
<td>Yes</td>
</tr>
<tr>
<td>2</td>
<td>Soundness of LDP</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>13</td>
<td>Council Response</td>
<td>Support noted.</td>
</tr>
</tbody>
</table>

Document: Revised LDP, p.41
Policy: GP02
Summary: Consider the policy meets the test of soundness.
### Representation Details

**Document:** Revised LDP, p.41  
**Policy:** GP03  
**Summary:** Propose additional text to clarify that any private sewerage facilities will not have an impact on the water quality of the SSSI.

<table>
<thead>
<tr>
<th>Item Question</th>
<th>Representation Text</th>
</tr>
</thead>
<tbody>
<tr>
<td>10 10</td>
<td>Soundness Test</td>
</tr>
<tr>
<td>11 11</td>
<td>Representation</td>
</tr>
<tr>
<td></td>
<td>GP3 General Development Principles – Service Infrastructure</td>
</tr>
</tbody>
</table>

Given that the public sewerage system does not extend to the Gwent Levels, we recommend that paragraph 3.15 of the Plan is amended to state that proposals which include private sewerage treatment facilities in the Gwent Levels will not be permitted unless it can be demonstrated there will be no adverse impact on the quality of the water entering the Gwent Levels SSSIs. (To meet Test of Soundness C2.)

<table>
<thead>
<tr>
<th>Item Question</th>
<th>Council Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>12 12</td>
<td>Speaking at Public Examination</td>
</tr>
</tbody>
</table>

Yes

**Item Question** Soundness of LDP  
**Tick-box reply** No

**Item Question** Council Responses

It is considered that paragraph 3.15 addresses this point by referring to the 'water environment'. Specific reference to Gwent Levels/SSSI is not necessary.
<table>
<thead>
<tr>
<th>Representation Details</th>
<th>Newport City Council Local Development Plan</th>
</tr>
</thead>
<tbody>
<tr>
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<tr>
<td>3683.L51//GP04</td>
<td>Natural Resources Wales</td>
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<tr>
<td>Document: Revised LDP, p.42</td>
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</tr>
<tr>
<td>Policy: GP04</td>
<td>Summary: Consider the policy meets the test of soundness.</td>
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</table>

**Item Question**        | **Representation Text**
---                      | ---
10                      | Soundness Test
11                      | Representation
22                      | Speaking at Public Examination

**Item Question**        | **Tick-box reply**
---                      | ---
22                      | Soundness of LDP

**Item Question**        | **Council Responses**
---                      | ---
13                      | Council Response
22                      | Support noted.
Item Question | Representation Text
---|---
10 | Soundness Test
C2, CE1, CE2, CE3

11 | Representation
GP5 General Development Principles – Natural Environment

We welcome the inclusion of a policy and supporting text which seeks to protect the natural environment and consider it meets Test of Soundness CE1. However, although the policy identifies the features to be afforded protection, we consider that its comprehension would be improved by redrafting criterion (ii) to read:

The proposals demonstrate how they avoid and mitigate negative impacts to biodiversity, ensuring that there are no significant adverse effects on - statutory and non-statutory designations; - protected species and their habitats; - habitats and species of principle importance for biodiversity in Wales; and - landscape features which support habitat connectivity.

Development will be required to provide compensatory measures for any adverse impacts which cannot be avoided or mitigated.

To ensure that the terms statutory and non-statutory designations are understood, we recommend that a definition is provided in the glossary to the Plan.

12 | Speaking at Public Examination
Yes

13 | Council Response
Instead of clarifying matters, it is considered that the proposed amendment to criterion (ii) would make the policy verbose.

The differences between 'statutory' and 'non-statutory' designations are made clear in Policy CE9 and TAN 5, so it is not necessary to amend this policy or the glossary.
### Representation Details

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<thead>
<tr>
<th>Item</th>
<th>Question</th>
<th>Representation Text</th>
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<tbody>
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<td>10</td>
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</tr>
<tr>
<td>11</td>
<td>Representation</td>
<td>Paragraphs 3.23 &amp; Paragraph 3.24</td>
</tr>
</tbody>
</table>

We welcome the clarification on the legislative requirements set out in these paragraphs and the cross reference to TAN 5. We consider that this approach meets Test of Soundness CE1.

<table>
<thead>
<tr>
<th>Item</th>
<th>Question</th>
<th>Council Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>12</td>
<td>Speaking at Public Examination</td>
<td>Yes</td>
</tr>
</tbody>
</table>

#### Document: Revised LDP, p.43, para.3.23 -3.24

Policy: GP05

Summary: Consider the policy meets tests of soundness.

#### Reporting Details

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<td>E</td>
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Table:

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<tbody>
<tr>
<td>10</td>
<td>Representation</td>
</tr>
<tr>
<td></td>
<td>The Proposals Map</td>
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<tr>
<td></td>
<td>Paragraph 5.4.6 of Planning Policy Wales (Edition 4, 2011) and 2.24 of Local Development Plans Wales (2005) specifies the need for natural heritage designations (of various types) to be clearly identified on the Plan's Proposals Maps. In line with national policy requirements, to ensure a logical and consistent approach to designations within the Plan and to meet Test of Soundness C2 we therefore recommend that European and national designations are clearly identified on the Proposals Map. Notwithstanding the above amendments, we have the following comments on points of detail regarding the mapping of biodiversity interest currently identified on the Constraints Map: - We welcome the increased width of boundary line for SSSIs; - The boundary between the Gwent Levels - Newport Wetlands SSSI and the Gwent Levels- Nash Goldcliff SSSI is not defined on the Map. Given that the notified interests differ between the two sites, we recommend that the boundary is clearly mapped and ask that this is amended accordingly; - The boundary of Newport Wetlands National Nature Reserve (NNR) is incorrectly mapped, and should be amended. We can provide the relevant boundary details if required. - Although Penhow Woodlands NNR is now marked on the Map, the area designated as SSSI is not – we recommend that this is amended; once again the relevant details can be provided on request.</td>
</tr>
<tr>
<td>11</td>
<td>Speaking at Public Examination</td>
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<tr>
<td>12</td>
<td>Council Response</td>
</tr>
<tr>
<td></td>
<td>It is not considered necessary to differentiate between SSSIs that are contiguous with one another. Change boundaries on the Constraints Plan in line with comments.</td>
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12/02/2014
### Representation Details

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Document: Revised LDP, p.81

Policy: EM02.05

Map: Inset 26: Newport City Centre

Summary: Query unidentified polygon on Inset 26.

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<td>11 11</td>
<td>Representation</td>
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<tr>
<td>12 12</td>
<td>Speaking at Public Examination</td>
</tr>
</tbody>
</table>

**Item Question**

Soundness Test

C2, CE1, CE2, CE3

**Representation**

We also query the site marked on Proposal Map Inset 26 which is not identified in the key.

**Council Response**

The polygon will be removed.

12/02/2014
<table>
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<tr>
<th>Item Question</th>
<th>Representation Text</th>
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<tbody>
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<td>C2, CE1, CE2, CE3</td>
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<td>11</td>
<td>Representation</td>
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<td></td>
<td>Paragraph 3.26</td>
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</table>

We welcome the references to the relevant legislation and national planning policy which apply to the protection of protected species, and consider that they meet Tests of Soundness CE1 and C2.

<table>
<thead>
<tr>
<th>Item Question</th>
<th>Council Responses</th>
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<tbody>
<tr>
<td>12</td>
<td>Speaking at Public Examination</td>
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<tr>
<th>Item Question</th>
<th>Tick-box reply</th>
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<td>2</td>
<td>Soundness of LDP</td>
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<th>Council Responses</th>
</tr>
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<tbody>
<tr>
<td>13</td>
<td>Council Response</td>
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</table>
### Representation Details

**Document:** Revised LDP, p.43, para.3.28  
**Policy:** GP05  
**Summary:** Clarification as to location of SINCs on Constraints Plan, require their addition to the Plan.

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<th>Question</th>
<th>Representation Text</th>
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<tbody>
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<tr>
<td>11</td>
<td>11</td>
<td>Representation</td>
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<tr>
<td></td>
<td></td>
<td>Paragraph 3.28</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Whilst we welcome the reference to locally designated sites, it is not clear whether SINCs are mapped under the heading Local Nature Reserve on the Constraints Map, or not mapped at all. As outlined above national policy advises that natural heritage designations should be mapped on the Proposals Map. We therefore recommend that local designations including SINCs are mapped on the Proposals Map. (To meet Test of Soundness C2.)</td>
</tr>
<tr>
<td>12</td>
<td>12</td>
<td>Speaking at Public Examination</td>
</tr>
</tbody>
</table>

**Council Responses**

Local designations of this nature have been excluded from the proposals map because they are continually reviewed and revised. The absence of fixed boundaries could result in unnecessary confusion throughout the plan period. Records of SINCs will be publicly available via the Councils website GIS.
### Representation Details

<table>
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<tr>
<th>Number</th>
<th>Item Question</th>
<th>Representation Text</th>
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<tbody>
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<td>11</td>
<td>Representation</td>
<td>GP6 General Development Principles – Quality of Design We consider that the policy meets Test of Soundness CE1.</td>
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<tr>
<td>12</td>
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<td>Yes</td>
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<td>Support noted.</td>
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**Document:** Revised LDP, p.47  
**Policy:** GP06  
**Summary:** Consider that the policy meets test of soundness.
**Representation Details**

**by:** (No grouping)

**Filtered to show:** (all of) Stage=L; Status=M

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</table>

**Document:** Revised LDP, p.49  
**Policy:** GP07

**Summary:** Request additional wording to policy so there is no unacceptable harm to the environment.

**Item Question**  
**Representation Text**

10 10 Soundness Test  
C2, CE1, CE2, CE3

11 11 Representation  
GP7 General Development Principles – Environmental Protection and Public Health

We request the insertion of additional wording (as underlined below [plaved in square brackets]) into Policy GP7, in order to meet Test of Soundness CE1, to reflect that development will not be permitted where there is unacceptable harm to the environment in addition to human health.

**DEVELOPMENT WILL NOT BE PERMITTED WHICH WOULD CAUSE OR RESULT IN UNACCEPTABLE HARM TO HEALTH [AND/OR THE NATURAL ENVIRONMENT] BECAUSE OF LAND CONTAMINATION, DUST, INSTABILITY OR SUBSIDENCE, AIR, HEAT, NOISE OR LIGHT POLLUTION, FLOODING, WATER POLLUTION, OR ANY OTHER IDENTIFIED RISK TO ENVIRONMENT, LOCAL AMENITY OR PUBLIC HEALTH AND SAFETY.**

This requested change will also support the explanation provided in paragraph 3.45. As part of a Preliminary Risk Assessment (PRA) the risks to controlled waters (hydrology and hydrogeological regime) and its impacts (for example, on ecological habitats) will be assessed.

12 12 Speaking at Public Examination  
Yes

**Item Question**  
**Tick-box reply**

2 2 Soundness of LDP  
No

**Item Question**  
**Council Responses**

13 13 Council Response

Policy GP5 addresses the potential impact of development proposals on the natural environment. There is no need to duplicate the text in this policy.
<table>
<thead>
<tr>
<th>Item</th>
<th>Question</th>
<th>Representation Text</th>
</tr>
</thead>
<tbody>
<tr>
<td>10</td>
<td>Soundness Test</td>
<td>C2, CE1, CE2, CE3</td>
</tr>
</tbody>
</table>
| 11   | Representation | CE1 Development in the Green Belt and Green Wedges  
Whilst we welcome a policy to protect the openness of the Green Belt and Green Wedges, we do not consider criterion (vi) in each of the policies to be in accord with national policy on green belts and green wedges. Planning Policy Wales clearly states that forms of development other than those listed in paragraph 4.7.16 will be inappropriate unless they maintain the openness of the green belt. Mineral working is not one of the listed uses considered to be appropriate development in a Green Belt/Green Wedges. To meet Test of Soundness C2 we recommend that criterion (vi) is deleted from the policy. |
<p>| 12   | Speaking at Public Examination | Yes                                                                                                                                                                                                                   |
| 13   | Council Response | PPW states that other forms of development would be inappropriate development unless they maintain the openness of the Green Belt or green wedge and do not conflict with the purposes of including land within it. It will be expected that any proposals would need to take landscape considerations which are further elaborated upon in Minerals Planning Policy Wales. |</p>
<table>
<thead>
<tr>
<th>Item</th>
<th>Question</th>
<th>Representation Text</th>
</tr>
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<tbody>
<tr>
<td>10</td>
<td>Soundness Test</td>
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<tr>
<td>11</td>
<td>Representation</td>
<td>CE2 Routeways, Corridors and Gateways, and Paragraph 4.3</td>
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<tr>
<td></td>
<td>We welcome the requirement to enhance wildlife connectivity, and consider the policy meets Test of Soundness CE1.</td>
<td></td>
</tr>
<tr>
<td>12</td>
<td>Speaking at Public Examination</td>
<td>Yes</td>
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**Item Question**

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</table>

**Council Responses**

<p>| Item  | Question                  |
|-------|---------------------------|----------------|
| 13    | Council Response          | Support noted. |</p>
<table>
<thead>
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<tr>
<td>11</td>
<td>Representation</td>
<td>CE3 Waterfront Development</td>
</tr>
<tr>
<td></td>
<td>We consider that the policy meets Test of Soundness CE1.</td>
<td></td>
</tr>
<tr>
<td>12</td>
<td>Speaking at Public Examination</td>
<td>Yes</td>
</tr>
<tr>
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**Item Question**: Council Responses

**Council Response**: Comments noted.
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<tr>
<td>11</td>
<td>Representation</td>
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<tr>
<td></td>
<td>CE4 Environmental Spaces and Corridors</td>
</tr>
</tbody>
</table>

We recognise that allotments are protected under Revised Deposit Plan Policy CF6. However, they are also a valuable part of Newport’s green infrastructure, supporting biodiversity and improving health and well being. We therefore suggest that allotments are also identified as ‘Environmental Spaces’ under Policy CE4.

<table>
<thead>
<tr>
<th>Item Question</th>
<th>Council Responses</th>
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<tbody>
<tr>
<td>12</td>
<td>Speaking at Public Examination Yes</td>
</tr>
<tr>
<td>2</td>
<td>Soundness of LDP  No</td>
</tr>
</tbody>
</table>

Allotments are already identified and given protection, therefore it is not necessary to further allocate them as environmental space. Their protection as allotments means that they still contribute to the overall Green Infrastructure of Newport.
<table>
<thead>
<tr>
<th>Rep'n/Para/Policy</th>
<th>Representer</th>
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<th>Accession No</th>
<th>Date Lodged</th>
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<td>26/07/2013</td>
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<td>M</td>
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</table>

Document: Revised LDP, p.54
Policy: CE05
Summary: Consider the policy meets the test of soundness, these boundaries should be set out on the Proposals Plan.

- Item Question 10  Soundness Test
- Item Question 11  Representation
  CE5 Historic Landscapes, Parks, Gardens and Battlefields
  Whilst we consider that the policy meets Test of Soundness CE1, we consider that the boundaries of these protected areas should, in line with paragraph 6.4.10 of Planning Policy Wales, be identified on the Proposals Map (to meet Test of Soundness C2).
  We welcome reference to the requirement for an Assessment of the Significance of the Impact of Development on Historic Landscape (ASIDOHL2) in paragraph 4.21. We recommend that further advice should be sought from Cadw, NRW and the Welsh Archaeological Trusts, preferably at the pre-application stage of the development. (To meet Test of Soundness CE1).

- Item Question 12  Speaking at Public Examination
  Yes

- Item Question 2  Soundness of LDP
  No

- Item Question 13  Council Response
  No information regarding historic battlefields currently exists, the other designations have been shown on the proposals/constraints map.
Representation Details

<table>
<thead>
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Document: Revised LDP, p.54, para.4.35
Policy: CE05
Summary: Welcome reference to Gwent Levels as a finite resource.

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<th>Representation Text</th>
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<td>Paragraph 4.35</td>
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Support noted.
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<tbody>
<tr>
<td>10</td>
<td>Soundness Test</td>
</tr>
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</table>
| 11            | Representation  
CE9 Locally Designated Nature Conservation and Geological Sites  
Although we welcome the policy, we consider that locally designated sites should be mapped on the Proposals Map.  
Paragraph 4.37 of the Revised Deposit Plan states that, ‘where appropriate non-statutory sites are identified on the Proposals Map.’ However, only one site appears to have been mapped, the LNR at Allt-Yr-Yn. To meet Test of Soundness C2, and to provide greater clarity to users of the Plan we recommend that the sites are plotted on the Proposals Map, in line with paragraph 5.4.6 of Planning Policy Wales (Edition 5, 2012) and 2.24 of Local Development Plans Wales (2005). |
| 12            | Speaking at Public Examination  
Yes                                                                                                                                                                                                                     |
| 2             | Soundness of LDP  
Tick-box reply: No                                                                                                                                                                                                              |
| 13            | Council Response  
Due to the small scale of the sites and the regularity that new sites are identified, they cannot be effectively mapped on the proposals/constraints plans. However all the current sites are shown in the background paper. Information will be updated and publicly available on the Council's website GIS. |

Document: Revised LDP, p.58, para.4.37  
Policy: CE09  
Summary: Recommend that the local designated nature conservation and geological sites should be shown on the Proposals Map.
### Representation Details

<table>
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<th>Accession No</th>
<th>Date Lodged</th>
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<td>3683.L67//CE10</td>
<td>Natural Resources Wales</td>
<td>26/07/2013</td>
<td>E</td>
<td>O</td>
<td>I</td>
<td>M</td>
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</table>

Document: Revised LDP, p.60
Policy: CE10
Summary: Amend the boundary of the coastal zone to reflect the tidal limit of the River Usk, and reflect the draft nature of SMP2.

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**Item Question**

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<tr>
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<th>Representation Text</th>
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<tr>
<td>10</td>
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<td>11</td>
<td>Representation</td>
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<tr>
<td></td>
<td>CE10 Coastal Zone</td>
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</tbody>
</table>

As the River Usk’s tidal limit is at Newbridge on Usk, beyond Newport’s boundary, in line with the Shoreline Management plan, an amendment is required on the Proposals Map to identify the continuation of the Coastal Zone along the River Usk to Newport’s administrative boundary.

We welcome the reference to the Shoreline Management Plan review (SMP2) in paragraph 4.48. However, whilst ‘Hold the Line’ is the policy option for a number of the policy units within the SMP, there is an intention to investigate ‘Managed Realignment’ for certain policy units (e.g. CALD1, and WEN2) during the first epoch of the SMP. Given that such a review is likely to occur during the LDP period, we suggest that this paragraph clarifies that SMP policy options are subject to future investigation. It is also important to recognise that the SMP2 is still in draft format and therefore subject to potential change.

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**Item Question**

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<tr>
<th>Item Question</th>
<th>Council Responses</th>
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<tr>
<td>12</td>
<td>Speaking at Public Examination</td>
</tr>
<tr>
<td>2</td>
<td>Soundness of LDP</td>
</tr>
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**Council Response**

The Alternative Sites Assessment will consider the proposed extension of the TATA steel site. The final location of the coastal zone will be dependent of the position of the settlement boundary. The boundary of the shoreline management plan does not provide a clear boundary, therefore the current coastal zone boundary is considered appropriate and readers are directed to the document and its policies. It is considered that as the policy reflects the current position as set out within SMP2 and refers the reader to the Shoreline Management Plan webpages, so as to keep the reader up to date, this is deemed to be sufficient.
<table>
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<tr>
<th>Item</th>
<th>Question</th>
<th>Representation Text</th>
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<tbody>
<tr>
<td>10</td>
<td>Soundness Test</td>
<td>C2, CE1, CE2, CE3</td>
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<tr>
<td>11</td>
<td>Representation</td>
<td>CE11 Renewable Energy</td>
</tr>
<tr>
<td></td>
<td></td>
<td>We consider that the policy meets Test of Soundness CE1.</td>
</tr>
<tr>
<td>12</td>
<td>Speaking at Public Examination</td>
<td>Yes</td>
</tr>
<tr>
<td>2</td>
<td>Soundness of LDP</td>
<td><strong>Tick-box reply</strong></td>
</tr>
<tr>
<td>13</td>
<td>Council Response</td>
<td>Support noted.</td>
</tr>
</tbody>
</table>

Support noted.
<table>
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<tr>
<th>Item Question</th>
<th>Representation Text</th>
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<tbody>
<tr>
<td>10</td>
<td>Soundness Test</td>
</tr>
<tr>
<td>11</td>
<td>Representation Paragraph 4.51</td>
</tr>
</tbody>
</table>

We welcome the recognition of the sensitivity of certain areas to wind turbine development, and welcome the particular reference to the Gwent Levels. However, given that wind energy developments have the potential to have significant effects on the Severn Estuary SPA and Ramsar bird features and assemblages, we recommend, as is the case with other policies in the Plan, that the potential need for project level HRA is identified in the supporting text of the policy for proposals near the Severn Estuary.

Further, piling works may have an adverse effect on the fish features of the River Usk SAC. We therefore suggest that paragraph 4.51 states that project level HRA will be required for proposals which have the potential to affect the SAC.

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<td>2</td>
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<tr>
<th>Item Question</th>
<th>Council Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>13</td>
<td>GP05 covers the requirements for a HRA on development in certain designations.</td>
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<tr>
<td>Item Question</td>
<td>Representation Text</td>
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<td>-------------------</td>
<td>--------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>10 Soundness Test</td>
<td>C2, CE1, CE2, CE3</td>
</tr>
<tr>
<td>11 Representation</td>
<td>We recommend that the capacity study referred to in the text is identified in the authority’s list of Background Papers and Technical Papers. (To meet Test of Soundness CE3.)</td>
</tr>
<tr>
<td>12 Speaking at Public Examination</td>
<td>Yes</td>
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</tbody>
</table>

**Item Question**

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<th>Item Question</th>
<th>Representation Text</th>
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<tbody>
<tr>
<td>2 Soundness of LDP</td>
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**Item Question**

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<tr>
<th>Item Question</th>
<th>Representation Text</th>
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</thead>
<tbody>
<tr>
<td>Council Response</td>
<td>Change: Refer to Capacity Study (Wind Turbines) to list of background Papers and Technical Papers.</td>
</tr>
<tr>
<td>Item Question</td>
<td>Representation Text</td>
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<td>11</td>
<td>Representation</td>
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<tr>
<td>12</td>
<td>Speaking at Public Examination</td>
</tr>
</tbody>
</table>

**Paragraph 4.55**

We welcome the proposal to consider and utilise brownfield sites before Greenfield sites, and the acknowledgement of their likely proximity to energy users, with the likely reduction in associated infrastructure.

**Council Response**

Support noted.
### Representation Details

**Rep’n/Para/Policy** 3683.L72//H01.01  
**Representor** Natural Resources Wales  
**Accession No** 26/07/2013  
**Date Lodged** 26/07/2013  
**Status** E O I M  

**Document:** Revised LDP, p.65  
**Policy:** H01.01  
**Summary:** Request further consideration to justify the site otherwise requests deletion of H1(1) McReadys, Ponthir Road.

<table>
<thead>
<tr>
<th>Item Question</th>
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<td>C2, CE1, CE2, CE3</td>
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<th>11</th>
<th>Representation</th>
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**Soundness Test**

Policy H1 includes a list of those sites (10 or more dwellings) as existing commitments (having planning permission) for residential development and those sites also subject to Section 106 agreements. We recognise that the following sites have extant planning permission:

H1- Adj, McReadys Ponthir Road (partial Zone C2)

As indicated in the above list, the proposed site allocations for housing are located partially or wholly within Zone C (sub division C1 and C2), as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004).

We have previously commented (in our response to your Stage 1 and 2 Draft SFCA dated 29 July 2011 ref. SE/2008/105263/OR-04/AE1-L01, from EAW) that allocations must not be allocated solely on the basis of an extant planning permission and such sites must be tested (against up to date environmental criteria and information; including flood consequence assessment) to confirm whether the land is suitable for allocation. We suggest that the above sites are tested. Such tests should confirm that the flood risk to any proposed site(s) can be managed to an acceptable level and that the site itself will not exacerbate flooding elsewhere over the lifetime of the development. Managing flood risk can have a significant impact on the design, cost and viability of developments. A Local Planning Authority should satisfy itself that the flood risk management measures associated with a potential allocation are feasible and practicable for the site to be included in your Plan.

As part of a stage 3 SFCA, your Authority may therefore wish to consider whether the above sites are suitable for allocation (test site suitability).

We therefore request that either:

i) Further consideration and/or work is carried out to enable your Authority to justify the site allocations with sufficient assessment to demonstrate that risks and consequences can be acceptably managed in line with section 10 of TAN15, or alternatively;

ii) The allocations should be deleted from the Plan or boundary amended to exclude all land identified as being at risk from flooding

We seek confirmation and clarity from you in this regard. We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public.

We consider that the policy fails to meet Test of Soundness CE2.
<table>
<thead>
<tr>
<th>Item Question</th>
<th>Council Responses</th>
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</thead>
<tbody>
<tr>
<td>2 2 Soundness of LDP</td>
<td>to clarify the site in question is not a new housing allocation. The plan simply reflects its status as a Housing Commitment. This site has planning permission and the developer has begun to clear the site. The planning permission is therefore expected to be delivered imminently and in line with the levels of flood mitigation as agreed at the planning application stage. The progression of the site in line with an agreed level of flood mitigation means that it would be inappropriate to remove the development site from the Plan.</td>
</tr>
</tbody>
</table>

12/02/2014
Natural Resources Wales

Policy H01.04

Summary: Proposed addition work to justify site within flood risk zone otherwise requests deletion of H1(4) Pirelli.

Policy H1 includes a list of those sites (10 or more dwellings) as existing commitments (having planning permission) for residential development and those sites also subject to Section 106 agreements. We recognise that the following sites have extant planning permission:

H4- Pirelli (Zone C1)

As indicated in the above list, the proposed site allocations for housing are located partially or wholly within Zone C (sub division C1 and C2), as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004).

We have previously commented (in our response to your Stage 1 and 2 Draft SFCA dated 29 July 2011 ref. SE/2008/105263/OR-04/AE1-L01, from EAW) that allocations must not be allocated solely on the basis of an extant planning permission and such sites must be tested (against up to date environmental criteria and information; including flood consequence assessment) to confirm whether the land is suitable for allocation. We suggest that the above sites are tested. Such tests should confirm that the flood risk to any proposed site(s) can be managed to an acceptable level and that the site itself will not exacerbate flooding elsewhere over the lifetime of the development. Managing flood risk can have a significant impact on the design, cost and viability of developments. A Local Planning Authority should satisfy itself that the flood risk management measures associated with a potential allocation are feasible and practicable for the site to be included in your Plan.

As part of a stage 3 SFCA, your Authority may therefore wish to consider whether the above sites are suitable for allocation (test site suitability).

We therefore request that either:

i) Further consideration and/or work is carried out to enable your Authority to justify the site allocations with sufficient assessment to demonstrate that risks and consequences can be acceptably managed in line with section 10 of TAN15, or alternatively;

ii) The allocations should be deleted from the Plan or boundary amended to exclude all land identified as being at risk from flooding

We seek confirmation and clarity from you in this regard. We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public.

We consider that the policy fails to meet Test of Soundness CE2.

Speaking at Public Examination

Item Question

Tick-box reply

12/02/2014
<table>
<thead>
<tr>
<th>Item</th>
<th>Question</th>
<th>Council Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>13</td>
<td>Soundness of LDP</td>
<td>To clarify, the site in question is not a new housing allocation. The Plan simply reflects its status as a Housing Commitment. This site has planning permission and the Section 106 agreement has been signed. The site is owned by the Seren Group who launched the site on 9th September 2013. The planning permission is therefore expected to be delivered imminently and in line with the agreed levels of flood mitigation as agreed at the planning application stage. The progression of the site in line with an agreed level of flood mitigation means that it would be inappropriate to remove the development site from the Plan.</td>
</tr>
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Representation Details

by: (No grouping)

Filtered to show: (all of) Stage=L; Status=M

Rep’n/Para/Policy Represenor Agent Accession No Date Lodged Late? Source Type Mode Status Status Modified

3683.L74//H01.05 Natural Resources Wales 26/07/2013 E O I M

Document: Revised LDP, p.65
Policy: H01.05
Summary: Require further work to justify allocation within flood risk area otherwise requests the deletion of H1(5) Glebelands.

Item Question Representation Text

Soundness Test

We recognise that the following sites have extant planning permission:

- H5 Glebelands (Zone C1)

As indicated in the above list, the proposed site allocations for housing are located partially or wholly within Zone C (sub division C1 and C2), as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004).

We have previously commented (in our response to your Stage 1 and 2 Draft SFCA dated 29 July 2011 ref. SE/2008/105263/OR-04/AE1-L01, from EAW) that allocations must not be allocated solely on the basis of an extant planning permission and such sites must be tested (against up to date environmental criteria and information; including flood consequence assessment) to confirm whether the land is suitable for allocation. We suggest that the above sites are tested. Such tests should confirm that the flood risk to any proposed site(s) can be managed to an acceptable level and that the site itself will not exacerbate flooding elsewhere over the lifetime of the development. Managing flood risk can have a significant impact on the design, cost and viability of developments. A Local Planning Authority should satisfy itself that the flood risk management measures associated with a potential allocation are feasible and practicable for the site to be included in your Plan.

As part of a stage 3 SFCA, your Authority may therefore wish to consider whether the above sites are suitable for allocation (test site suitability).

We therefore request that either:

i) Further consideration and/or work is carried out to enable your Authority to justify the site allocations with sufficient assessment to demonstrate that risks and consequences can be acceptably managed in line with section 10 of TAN15, or alternatively;

ii) The allocations should be deleted from the Plan or boundary amended to exclude all land identified as being at risk from flooding

We seek confirmation and clarity from you in this regard. We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public.

We consider that the policy fails to meet Test of Soundness CE2.

Item Question Speaking at Public Examination

Tick-box reply

12/02/2014
<table>
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</table>

**Item Question Council Responses**

To clarify, the site in question is not a new housing allocation. The Plan simply reflects its status as a Housing Commitment. This site has been sold to a developer who will need to submit a planning application for development. This application would be assessed in terms of the most up to date information and would be required to be justified against TAN15. The progression of the site which would be required to meet the required level of flood mitigation means that it would be inappropriate to remove the development site from the Plan. The site is allocated within the LDP due to the fact that it is part of an extant permission for residential development alongside the provision of the primary school which has been completed.
Representations Details
by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M

Rep'n/Para/Policy Representor Agent Accession No Date Lodged Late? Source Type Mode Status Status Modified
3683.L75//H01.06 Natural Resources Wales 26/07/2013 E O I M

Document: Revised LDP, p.65
Policy: H01.06
Summary: Request more work on justifying allocation within flood risk zone otherwise requests the deletion of H1(6) 254 Cromwell Road.

---

10  Soundness Test
C2, CE1, CE2, CE3

11  Representation

H1 Housing Sites

Policy H1 includes a list of those sites (10 or more dwellings) as existing commitments (having planning permission) for residential development and those sites also subject to Section 106 agreements. We recognise that the following sites have extant planning permission:

H6- 254 Cromwell Road (Zone C1)

As indicated in the above list, the proposed site allocations for housing are located partially or wholly within Zone C (sub division C1 and C2), as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004).

We have previously commented (in our response to your Stage 1 and 2 Draft SFCA dated 29 July 2011 ref. SE/2008/105263/OR-04/AE1-L01, from EAW) that allocations must not be allocated solely on the basis of an extant planning permission and such sites must be tested (against up to date environmental criteria and information; including flood consequence assessment) to confirm whether the land is suitable for allocation. We suggest that the above sites are tested. Such tests should confirm that the flood risk to any proposed site(s) can be managed to an acceptable level and that the site itself will not exacerbate flooding elsewhere over the lifetime of the development. Managing flood risk can have a significant impact on the design, cost and viability of developments. A Local Planning Authority should satisfy itself that the flood risk management measures associated with a potential allocation are feasible and practicable for the site to be included in your Plan.

As part of a stage 3 SFCA, your Authority may therefore wish to consider whether the above sites are suitable for allocation (test site suitability).

We therefore request that either:

i) Further consideration and/or work is carried out to enable your Authority to justify the site allocations with sufficient assessment to demonstrate that risks and consequences can be acceptably managed in line with section 10 of TAN15, or alternatively;

ii) The allocations should be deleted from the Plan or boundary amended to exclude all land identified as being at risk from flooding

We seek confirmation and clarity from you in this regard. We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public.

We consider that the policy fails to meet Test of Soundness CE2.

12  Speaking at Public Examination

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Item Question Tick-box reply

12/02/2014
### Representation Details

**by:** (No grouping)

**Filtered to show:** (all of) Stage=L; Status=M

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**Item Question**  Council Response

The application on this site has lapsed. Any future application on the site will be required to undertake a flood assessment based on the most up to date information.
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<th>Item</th>
<th>Question</th>
<th>Representation Text</th>
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<tr>
<td>10</td>
<td>10</td>
<td>Soundness Test</td>
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<td>11</td>
<td>11</td>
<td>Representation</td>
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</table>

H1 Housing Sites

Policy H1 includes a list of those sites (10 or more dwellings) as existing commitments (having planning permission) for residential development and those sites also subject to Section 106 agreements. We recognise that the following sites have extant planning permission:

H9B Frobisher Road (Zone C1)

As indicated in the above list, the proposed site allocations for housing are located partially or wholly within Zone C (sub division C1 and C2), as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004).

We have previously commented (in our response to your Stage 1 and 2 Draft SFCA dated 29 July 2011 ref. SE/2008/105263/OR-04/AE1-L01, from EAW) that allocations must not be allocated solely on the basis of an extant planning permission and such sites must be tested (against up to date environmental criteria and information; including flood consequence assessment) to confirm whether the land is suitable for allocation. We suggest that the above sites are tested. Such tests should confirm that the flood risk to any proposed site(s) can be managed to an acceptable level and that the site itself will not exacerbate flooding elsewhere over the lifetime of the development. Managing flood risk can have a significant impact on the design, cost and viability of developments. A Local Planning Authority should satisfy itself that the flood risk management measures associated with a potential allocation are feasible and practicable for the site to be included in your Plan.

As part of a stage 3 SFCA, your Authority may therefore wish to consider whether the above sites are suitable for allocation (test site suitability).

We therefore request that either:

i) Further consideration and/or work is carried out to enable your Authority to justify the site allocations with sufficient assessment to demonstrate that risks and consequences can be acceptably managed in line with section 10 of TAN15, or alternatively;

ii) The allocations should be deleted from the Plan or boundary amended to exclude all land identified as being at risk from flooding.

We seek confirmation and clarity from you in this regard. We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public.

We consider that the policy fails to meet Test of Soundness CE2.
## Soundness of LDP

**Item Question**  
To clarify, the site in question is not a new housing allocation. The Plan simply reflects its status as a Housing Commitment. The site has current outline planning permission for residential development. The reserved matters were approved in 2009 with no objections from Environment Agency Wales. The permission is extant until July 2014. It is therefore considered appropriate for the site to remain in the plan due to its current permission. If the application was to lapse then any future application on the site would be required to meet the up to date standards for flood risk assessments.

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### Council Responses

<table>
<thead>
<tr>
<th>Rep'n/Para/Policy</th>
<th>Representer</th>
<th>Agent</th>
<th>Accession No</th>
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<tr>
<td>2 2</td>
<td>Soundness of LDP</td>
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<td>No</td>
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Soundness Test

C2, CE1, CE2, CE3

Representation

H1 Housing Sites

Policy H1 includes a list of those sites (10 or more dwellings) as existing commitments (having planning permission) for residential development and those sites also subject to Section 106 agreements. We recognise that the following sites have extant planning permission:

H15 Old Town Dock (Zone C1)

As indicated in the above list, the proposed site allocations for housing are located partially or wholly within Zone C (sub division C1 and C2), as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004).

We have previously commented (in our response to your Stage 1 and 2 Draft SFCA dated 29 July 2011 ref. SE/2008/105263/OR-04/AE1-L01, from EAW) that allocations must not be allocated solely on the basis of an extant planning permission and such sites must be tested (against up to date environmental criteria and information; including flood consequence assessment) to confirm whether the land is suitable for allocation. We suggest that the above sites are tested. Such tests should confirm that the flood risk to any proposed site(s) can be managed to an acceptable level and that the site itself will not exacerbate flooding elsewhere over the lifetime of the development. Managing flood risk can have a significant impact on the design, cost and viability of developments. A Local Planning Authority should satisfy itself that the flood risk management measures associated with a potential allocation are feasible and practicable for the site to be included in your Plan.

As part of a stage 3 SFCA, your Authority may therefore wish to consider whether the above sites are suitable for allocation (test site suitability).

We therefore request that either:

i) Further consideration and/or work is carried out to enable your Authority to justify the site allocations with sufficient assessment to demonstrate that risks and consequences can be acceptably managed in line with section 10 of TAN15, or alternatively;

ii) The allocations should be deleted from the Plan or boundary amended to exclude all land identified as being at risk from flooding

We seek confirmation and clarity from you in this regard. We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public.

We consider that the policy fails to meet Test of Soundness CE2.

Speaking at Public Examination

Yes

Item Question

Tick-box reply
**Representation Details**

by: (No grouping)

Filtered to show: (all of) Stage=L; Status=M

<table>
<thead>
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<th>Rep'n/Para/Policy</th>
<th>Representor</th>
<th>Agent</th>
<th>Accession No</th>
<th>Date Lodged</th>
<th>Late?</th>
<th>Source</th>
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<th>Status</th>
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<tr>
<td>2 2</td>
<td>Soundness of LDP</td>
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<td></td>
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<td>No</td>
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**Item Question** Council Responses

13 13 Council Response

This site is allocated within the Local Development Plan as a housing commitment. This allocation reflects the planning application which was approved for residential development at the site and has now lapsed (December 2012). As part of this approval the relevant assessments were undertaken to satisfy the Local Planning Authority which included the relevant flood consequence assessment. The site will need to satisfy the relevant flood risk assessments at the planning application stage. The site remains as a key site within the wider regeneration scheme at the Old Town Dock area of Newport. It has a temporary planning permission for car parking however the site is in a prime location and it is anticipated that development will occur on the site within the latter part of the plan period.
### Representation Details

**Document:** Revised LDP, p.65  
**Policy:** H01.16  
**Summary:** Further work required to justify site in flood risk zone otherwise requests deletion of H1(16) Penmaen Wharf

<table>
<thead>
<tr>
<th>Item</th>
<th>Question</th>
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</thead>
<tbody>
<tr>
<td>10</td>
<td>Soundness Test</td>
<td>C2, CE1, CE2, CE3</td>
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</tbody>
</table>

**Soundness Test**

Policy H1 includes a list of those sites (10 or more dwellings) as existing commitments (having planning permission) for residential development and those sites also subject to Section 106 agreements. We recognise that the following sites have extant planning permission:

- H16- Penmaen Wharf (Zone C2)

As indicated in the above list, the proposed site allocations for housing are located partially or wholly within Zone C (sub division C1 and C2), as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004). We have previously commented (in our response to your Stage 1 and 2 Draft SFCA dated 29 July 2011 ref. SE/2008/105263/OR-04/AE1-L01, from EAW) that allocations must not be allocated solely on the basis of an extant planning permission and such sites must be tested (against up to date environmental criteria and information; including flood consequence assessment) to confirm whether the land is suitable for allocation. We suggest that the above sites are tested. Such tests should confirm that the flood risk to any proposed site(s) can be managed to an acceptable level and that the site itself will not exacerbate flooding elsewhere over the lifetime of the development. Managing flood risk can have a significant impact on the design, cost and viability of developments. A Local Planning Authority should satisfy itself that the flood risk management measures associated with a potential allocation are feasible and practicable for the site to be included in your Plan.

As part of a stage 3 SFCA, your Authority may therefore wish to consider whether the above sites are suitable for allocation (test site suitability).

We therefore request that either:

i) Further consideration and/or work is carried out to enable your Authority to justify the site allocations with sufficient assessment to demonstrate that risks and consequences can be acceptably managed in line with section 10 of TAN15, or alternatively;

ii) The allocations should be deleted from the Plan or boundary amended to exclude all land identified as being at risk from flooding

We seek confirmation and clarity from you in this regard. We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public.

We consider that the policy fails to meet Test of Soundness CE2.

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<tr>
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</thead>
<tbody>
<tr>
<td>12</td>
<td>Speaking at Public Examination</td>
<td>Yes</td>
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</table>

**Speaking at Public Examination**

Tick-box reply

- Soundness of LDP

- No
To clarify, the site in question is not a new housing allocation. The Plan simply reflects its status as a Housing Commitment. This site has planning permission and the Section 106 agreement has been signed. The planning permission is expected to be delivered within the plan period and in line with the agreed levels of flood mitigation as agreed at the planning application stage. The progression of the site in line with an agreed level of flood mitigation means that it would be inappropriate to remove the development site from the Plan. If the application was to lapse then any future application on the site would be required to meet the up to date standards for flood risk assessments and take into account the redesignation of this area as Zone C2.
Policy: H01.18

Summary: Further work required to justify allocation otherwise requests deletion of H1(18) Newport Athletic Club.

---

10 Soundness Test

C2, CE1, CE2, CE3

Policy H1 includes a list of those sites (10 or more dwellings) as existing commitments (having planning permission) for residential development and those sites also subject to Section 106 agreements. We recognise that the following sites have extant planning permission:

H18- Newport Athletic Club (Zone C1)

As indicated in the above list, the proposed site allocations for housing are located partially or wholly within Zone C (sub division C1 and C2), as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004). We have previously commented (in our response to your Stage 1 and 2 Draft SFCA dated 29 July 2011 ref. SE/2008/105263/OR-04/AE1-L01, from EAW) that allocations must not be allocated solely on the basis of an extant planning permission and such sites must be tested (against up to date environmental criteria and information; including flood consequence assessment) to confirm whether the land is suitable for allocation. We suggest that the above sites are tested. Such tests should confirm that the flood risk to any proposed site(s) can be managed to an acceptable level and that the site itself will not exacerbate flooding elsewhere over the lifetime of the development. Managing flood risk can have a significant impact on the design, cost and viability of developments. A Local Planning Authority should satisfy itself that the flood risk management measures associated with a potential allocation are feasible and practicable for the site to be included in your Plan.

As part of a stage 3 SFCA, your Authority may therefore wish to consider whether the above sites are suitable for allocation (test site suitability).

We therefore request that either:

i) Further consideration and/or work is carried out to enable your Authority to justify the site allocations with sufficient assessment to demonstrate that risks and consequences can be acceptably managed in line with section 10 of TAN15, or alternatively;

ii) The allocations should be deleted from the Plan or boundary amended to exclude all land identified as being at risk from flooding

We seek confirmation and clarity from you in this regard. We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public.

We consider that the policy fails to meet Test of Soundness CE2.
### Representation Details

**Rep’n/Para/Policy** | **Representor** | **Agent** | **Accession No** | **Date Lodged** | **Late?** | **Source** | **Type** | **Mode** | **Status** | **Status Modified**
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<thead>
<tr>
<th>Item Question</th>
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<tbody>
<tr>
<td>13</td>
<td>To clarify, the site in question is not a new housing allocation. The Plan simply reflects its status as a Housing Commitment. This site has planning permission but it is not anticipated that any units will be completed on the site during the plan period. Notwithstanding this, the site has planning permission which has been partially implemented. The progression of the site will be undertaken in line with an agreed level of flood mitigation it would therefore be inappropriate to remove the development site from the Plan. If a new permission was sought on the site then the flood assessment would be undertaken using the most up to date information.</td>
</tr>
</tbody>
</table>
Representation Details

by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M

Rep’n/Para/Policy     Representor     Agent       Accession No Date Lodged Late? Source Type Mode Status Status Modified
3683.L80//H01.21 Natural Resources Wales 26/07/2013 □ E O I M

Document: Revised LDP, p.65
Policy: H01.21
Summary: Further work required to justify allocation otherwise requests deletion of H1(21) Former Floors 2 Go.

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Item Question Representation Text

10 10 Soundness Test

11 11 Representation

H1 Housing Sites

Policy H1 includes a list of those sites (10 or more dwellings) as existing commitments (having planning permission) for residential development and those sites also subject to Section 106 agreements. We recognise that the following sites have extant planning permission:

H21- Former Floors 2 Go (Zone C1)

As indicated in the above list, the proposed site allocations for housing are located partially or wholly within Zone C (sub division C1 and C2), as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004).

We have previously commented (in our response to your Stage 1 and 2 Draft SFCA dated 29 July 2011 ref. SE/2008/105263/OR-04/AE1-L01, from EAW) that allocations must not be allocated solely on the basis of an extant planning permission and such sites must be tested (against up to date environmental criteria and information; including flood consequence assessment) to confirm whether the land is suitable for allocation. We suggest that the above sites are tested. Such tests should confirm that the flood risk to any proposed site(s) can be managed to an acceptable level and that the site itself will not exacerbate flooding elsewhere over the lifetime of the development. Managing flood risk can have a significant impact on the design, cost and viability of developments. A Local Planning Authority should satisfy itself that the flood risk management measures associated with a potential allocation are feasible and practicable for the site to be included in your Plan.

As part of a stage 3 SFCA, your Authority may therefore wish to consider whether the above sites are suitable for allocation (test site suitability).

We therefore request that either:

i) Further consideration and/or work is carried out to enable your Authority to justify the site allocations with sufficient assessment to demonstrate that risks and consequences can be acceptably managed in line with section 10 of TAN15, or alternatively;

ii) The allocations should be deleted from the Plan or boundary amended to exclude all land identified as being at risk from flooding

We seek confirmation and clarity from you in this regard. We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public.

We consider that the policy fails to meet Test of Soundness CE2.

12 12 Speaking at Public Examination Yes

12/02/2014
<table>
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<tr>
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<tbody>
<tr>
<td>13 13</td>
<td>Council Response</td>
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<tr>
<td>To clarify, the site in question is not a new housing allocation. The Plan simply reflects its status as a Housing Commitment. This site has planning permission for 12 units on the site. The Council has also given a more recent planning permission for the construction of 10 units, and this permission is waiting the signing of a section 106 agreement. The more recent planning permission, for 10 units, is expected to be delivered within the plan period and in line with the agreed levels of flood mitigation as agreed at the planning application stage. The progression of the site in line with an agreed level of flood mitigation means that it would be inappropriate to remove the development site from the Plan. If the application was to lapse then any future application on the site would be required to meet the up to date standards for flood risk assessments.</td>
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</table>
Policy H1 includes a list of those sites (10 or more dwellings) as existing commitments (having planning permission) for residential development and those sites also subject to Section 106 agreements. We recognise that the following sites have extant planning permission:

H27- 21 Kelvedon Street (Zone C1)

As indicated in the above list, the proposed site allocations for housing are located partially or wholly within Zone C (sub division C1 and C2), as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004).

We have previously commented (in our response to your Stage 1 and 2 Draft SFCA dated 29 July 2011 ref. SE/2008/105263/OR-04/AE1-L01, from EAW) that allocations must not be allocated solely on the basis of an extant planning permission and such sites must be tested (against up to date environmental criteria and information; including flood consequence assessment) to confirm whether the land is suitable for allocation. We suggest that the above sites are tested. Such tests should confirm that the flood risk to any proposed site(s) can be managed to an acceptable level and that the site itself will not exacerbate flooding elsewhere over the lifetime of the development. Managing flood risk can have a significant impact on the design, cost and viability of developments. A Local Planning Authority should satisfy itself that the flood risk management measures associated with a potential allocation are feasible and practicable for the site to be included in your Plan.

As part of a stage 3 SFCA, your Authority may therefore wish to consider whether the above sites are suitable for allocation (test site suitability).

We therefore request that either:

i) Further consideration and/or work is carried out to enable your Authority to justify the site allocations with sufficient assessment to demonstrate that risks and consequences can be acceptably managed in line with section 10 of TAN15, or alternatively;

ii) The allocations should be deleted from the Plan or boundary amended to exclude all land identified as being at risk from flooding

We seek confirmation and clarity from you in this regard. We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public.

We consider that the policy fails to meet Test of Soundness CE2.
<table>
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<tbody>
<tr>
<td>13</td>
<td>Soundness of LDP</td>
<td>This site has planning permission subject to the signing of a Section 106 agreement. The planning permission is expected to be delivered within the plan period and in line with the agreed levels of flood mitigation as agreed at the planning application stage. The progression of the site in line with an agreed level of flood mitigation means that it would be inappropriate to remove the development site from the Plan. If the application was to lapse then any future application on the site would be required to meet the up to date standards for flood risk assessments.</td>
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<tr>
<td>Item Question</td>
<td>Representation Text</td>
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<td>---------------</td>
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<tr>
<td>10 10 Soundness Test</td>
<td>We recognise that the following sites have extant planning permission: H31B Roman Lodge Hotel (Zone C1) As indicated in the above list, the proposed site allocations for housing are located partially or wholly within Zone C (sub division C1 and C2), as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004). We have previously commented (in our response to your Stage 1 and 2 Draft SFCA dated 29 July 2011 ref. SE/2008/105263/OR-04/AE1-L01, from EAW) that allocations must not be allocated solely on the basis of an extant planning permission and such sites must be tested (against up to date environmental criteria and information; including flood consequence assessment) to confirm whether the land is suitable for allocation. We suggest that the above sites are tested. Such tests should confirm that the flood risk to any proposed site(s) can be managed to an acceptable level and that the site itself will not exacerbate flooding elsewhere over the lifetime of the development. Managing flood risk can have a significant impact on the design, cost and viability of developments. A Local Planning Authority should satisfy itself that the flood risk management measures associated with a potential allocation are feasible and practicable for the site to be included in your Plan. As part of a stage 3 SFCA, your Authority may therefore wish to consider whether the above sites are suitable for allocation (test site suitability). We therefore request that either: i) Further consideration and/or work is carried out to enable your Authority to justify the site allocations with sufficient assessment to demonstrate that risks and consequences can be acceptably managed in line with section 10 of TAN15, or alternatively; ii) The allocations should be deleted from the Plan or boundary amended to exclude all land identified as being at risk from flooding We seek confirmation and clarity from you in this regard. We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public. We consider that the policy fails to meet Test of Soundness CE2.</td>
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<tr>
<td>11 11 Representation</td>
<td>H1 Housing Sites</td>
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<td>12 12 Speaking at Public Examination</td>
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Item Question: Soundness of LDP

Tick-box reply: No
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<tr>
<td>13</td>
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<td>This site has planning permission subject to the signing of a Section 106 agreement. The planning permission is expected to be delivered within the plan period and in line with the agreed levels of flood mitigation as agreed at the planning application stage. The progression of the site in line with an agreed level of flood mitigation means that it would be inappropriate to remove the development site from the Plan. If the application was to lapse then any future application on the site would be required to meet the up to date standards for flood risk assessments.</td>
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</table>
Policy H1 includes a list of those sites (10 or more dwellings) as existing commitments (having planning permission) for residential development and those sites also subject to Section 106 agreements. We recognise that the following sites have extant planning permission:

H32- Existing Sainsbury’s (partial Zone C1)

As indicated in the above list, the proposed site allocations for housing are located partially or wholly within Zone C (sub division C1 and C2), as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004).

We have previously commented (in our response to your Stage 1 and 2 Draft SFCA dated 29 July 2011 ref. SE/2008/105263/OR-04/AE1-L01, from EAW) that allocations must not be allocated solely on the basis of an extant planning permission and such sites must be tested (against up to date environmental criteria and information; including flood consequence assessment) to confirm whether the land is suitable for allocation. We suggest that the above sites are tested. Such tests should confirm that the flood risk to any proposed site(s) can be managed to an acceptable level and that the site itself will not exacerbate flooding elsewhere over the lifetime of the development. Managing flood risk can have a significant impact on the design, cost and viability of developments. A Local Planning Authority should satisfy itself that the flood risk management measures associated with a potential allocation are feasible and practicable for the site to be included in your Plan.

As part of a stage 3 SFCA, your Authority may therefore wish to consider whether the above sites are suitable for allocation (test site suitability).

We therefore request that either:

i) Further consideration and/or work is carried out to enable your Authority to justify the site allocations with sufficient assessment to demonstrate that risks and consequences can be acceptably managed in line with section 10 of TAN15, or alternatively;

ii) The allocations should be deleted from the Plan or boundary amended to exclude all land identified as being at risk from flooding

We seek confirmation and clarity from you in this regard. We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public.

We consider that the policy fails to meet Test of Soundness CE2.
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<tbody>
<tr>
<td>2  Soundness of LDP</td>
<td>This site has planning permission subject to the signing of a Section 106 agreement. The planning permission is expected to be delivered within the plan period and in line with the agreed levels of flood mitigation as agreed at the planning application stage. The progression of the site in line with an agreed level of flood mitigation means that it would be inappropriate to remove the development site from the Plan. If the application was to lapse then any future application on the site would be required to meet the up to date standards for flood risk assessments.</td>
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Natural Resources Wales

Policy H1 includes a list of those sites (10 or more dwellings) as existing commitments (having planning permission) for residential development and those sites also subject to Section 106 agreements. We recognise that the following sites have extant planning permission:

H34- Bankside, Coverack Road (Natural Resources Wales Flood zones)

As indicated in the above list, the proposed site allocations for housing are located partially or wholly within Zone C (sub division C1 and C2), as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004).

We have previously commented (in our response to your Stage 1 and 2 Draft SFCA dated 29 July 2011 ref. SE/2008/105263/OR-04/AE1-L01, from EAW) that allocations must not be allocated solely on the basis of an extant planning permission; such sites must be tested (against up to date environmental criteria and information; including flood consequence assessment) to confirm whether the land is suitable for allocation. We suggest that the above sites are tested. Such tests should confirm that the flood risk to any proposed site(s) can be managed to an acceptable level and that the site itself will not exacerbate flooding elsewhere over the lifetime of the development. Managing flood risk can have a significant impact on the design, cost and viability of developments. A Local Planning Authority should satisfy itself that the flood risk management measures associated with a potential allocation are feasible and practicable for the site to be included in your Plan.

As part of a stage 3 SFCA, your Authority may therefore wish to consider whether the above sites are suitable for allocation (test site suitability).

We therefore request that either:

i) Further consideration and/or work is carried out to enable your Authority to justify the site allocations with sufficient assessment to demonstrate that risks and consequences can be acceptably managed in line with section 10 of TAN15, or alternatively;

ii) The allocations should be deleted from the Plan or boundary amended to exclude all land identified as being at risk from flooding

We seek confirmation and clarity from you in this regard. We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public.

We consider that the policy fails to meet Test of Soundness CE2.
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<tr>
<td>13</td>
<td>Council Response</td>
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This site has planning permission subject to the signing of a Section 106 agreement. The planning permission is expected to be delivered within the plan period and in line with the agreed levels of flood mitigation as agreed at the planning application stage. The progression of the site in line with an agreed level of flood mitigation means that it would be inappropriate to remove the development site from the Plan. If the application was to lapse then any future application on the site would be required to meet the up to date standards for flood risk assessments.

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3683.L85/5.2 - 5.3/  
Natural Resources Wales  
26/07/2013  
E  C  I  M

Document: Revised LDP, p.65, para.5.2 - 5.3  
Policy: H01  
Summary: See previous comments on SP10

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| 11   | Representation | Paragraph 5.2 and 5.3  
Please see our comments to SP10 above. |
| 12   | Speaking at Public Examination | Yes |

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<td>10</td>
<td>Soundness Test</td>
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<tr>
<td>11</td>
<td>Housing Allocation Tables</td>
<td></td>
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</table>

The boundaries of a number of allocations are not clearly defined on the Proposals Map. These are H(2), H(16), H(52), H(54). We recommend that the Proposals Map is amended to clearly identify the allocation boundaries and that they are referenced with appropriate shading.

<table>
<thead>
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<tbody>
<tr>
<td>13</td>
<td>The following housing sites are shown on the proposals plan. The sites H1.6 Penmaen Wharf, H1.52 Old Town Dock Remainder and H1.54 Former Alcan Factory are Regeneration sites. The respective figures are shown on the proposals plan as part of the Regeneration designation. The housing site H1.2 Hanbury Garage is clearly shown on the Inset Plan 27.</td>
</tr>
</tbody>
</table>
Soundness Test
C2, CE1, CE2, CE3

The housing allocation H35 of 4.63ha is partially located within Zone C1, as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004). Our Flood Map information, which is updated on a quarterly basis, confirms the site to be partially within the 0.5% (1 in 200 year) and 0.1% (1 in 1000 year) annual probability tidal flood outlines of the River Usk, a designated main river.

Speaking at Public Examination
Yes

Soundness of LDP
No

The site would be required to have a Flood Consequence Assessment undertaken at the planning application stage. The Strategic Flood Consequence Assessment (SFCA) undertaken for the Local Development Plan notes that the site under present day conditions no inundation of the site is experienced during the 1 in 200 year event or the 1 in 1000 year event (defended scenarios); Climate change and breach of defences are the predominant factors with regards to future flooding; The maximum hazard is Extreme in scenarios where the site becomes inundated, however these are restricted to small areas of the site. The SFCA also goes on to note that moderate mitigation is required to meet TAN15 Acceptability criteria for future max depth levels and for future escape/evacuation from the site is within tolerable limits. The detail assessment at the planning application will make the final decision as to the development capable on the site but there is nothing to stop this site remaining in the plan at this strategic stage of assessment and identification.
### Representation Details

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<td>3683.L88//H01.47</td>
<td>26/07/2013</td>
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<td>O I M</td>
<td>Natural Resources Wales</td>
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</table>

**Document:** Revised LDP, p.67  
**Policy:** H01.47  
**Summary:** Require additional text to ensure that development at Llanwern does not affect the SSSI.

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<tr>
<td>11 Representation</td>
<td>H1 (47) Glan Llyn (Former Llanwern Steelworks)</td>
</tr>
</tbody>
</table>

NRW are aware that the Llanwern site currently operates a closed system with a dedicated outfall system into the Severn Estuary, which avoids discharge into the Gwent Levels-B Nash & Goldcliff SSSI. We consider that this provision should be retained as part of any new development at the site. We therefore recommend that the supporting text of the clearly state that proposals for development at the Llanwern allocation will be required to demonstrate how potential adverse impacts on the Gwent Levels-B Nash and Goldcliff, Whitson, and Redwick and Llandevenny SSSIs are to be avoided or mitigated, and demonstrate how current mitigation measures at the site will be incorporated into any new development.

<table>
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<tbody>
<tr>
<td>12 Speaking at Public Examination</td>
<td>Yes</td>
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</table>

**Tick-box reply**  
2 Soundness of LDP | No

**Item Question**  
**Council Responses** |

13 Council Response  
The plan provides robust policy framework to ensure that development within the control of the planning system does not have a detrimental impact on ecology.
### Representation Details

**Document:** Revised LDP, p.68  
**Policy:** H01.49  
**Map:** Inset 27: Caerleon Inset Plan  
**Summary:** Inset Map 27 required amending to remove allocation at Mill street from flood risk C2.

<table>
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<th>Item Question</th>
<th>Representation Text</th>
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</thead>
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<tr>
<td>10 10</td>
<td>Soundness Test C2, CE1, CE2, CE3</td>
</tr>
<tr>
<td>11 11</td>
<td>Representation H1 (49) Mill Street</td>
</tr>
</tbody>
</table>

A housing allocation H1 (49) of 0.4ha is partially located within Zone C2, as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004). Our Flood Map information, which is updated on a quarterly basis, confirms the site to be partially within the 0.1% (1 in 1000 year) annual probability fluvial flood outline of the River Lwyd, a designated main river.

We acknowledge the work that has been done by your Authority and your consultants (URS, formally URS Scott Wilson) in producing a Strategic Flood Consequence Assessment (SFCA) Stage 1 (final report August 2011), Stage 2 (final report August 2011, Addendum January 2012), and Stage 3 (March 2013). The SFCA has highlighted flood risk as an issue in this area, however, the Stage 3 Methodology Paper development considers that potential development could be steered towards Flood Zone 1.

We note from the Flood Risk Background paper, dated June 2013, that the boundary of the site has been redrawn so that residential development is only within Flood Zone 1. We are supportive of this amendment, however we wish to highlight that Inset Map 27 does not appear to have been amended to reflect the redrawn housing allocation boundary.

<table>
<thead>
<tr>
<th>Item Question</th>
<th>Council Responses</th>
</tr>
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<tr>
<td>12 12</td>
<td>Speaking at Public Examination Yes</td>
</tr>
<tr>
<td>2 2</td>
<td>Soundness of LDP No</td>
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</table>

**Council Response**

Agree to revise inset plan 27 to reflect that this housing allocation no longer includes the section within Flood Risk C2.
<table>
<thead>
<tr>
<th>Item Question</th>
<th>Representation Text</th>
</tr>
</thead>
<tbody>
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<td>10</td>
<td>Soundness Test C2, CE1, CE2, CE3</td>
</tr>
<tr>
<td>11</td>
<td>Representation H1 (50) Herbert Road and Enterprise House</td>
</tr>
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</table>

A site of 2.4 ha at Herbert Road and Enterprise House is being allocated for residential development in your Plan. This site is located within Zone C1, as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004). Our Flood Map information, which is updated on a quarterly basis, confirms the site to be within the 0.5% (1 in 200 year) and 0.1% (1 in 1000 year) annual probability fluvial flood outlines of the River Usk, a designated main river.

TAN15 (Section 10) is clear, “allocations should only be made in Zone C if it can be justified that a development/use has to be located there in accordance with section 6 and if the consequences of locating development are acceptable, in accordance with section 7 and appendix 1. The local planning authority ‘will need to fully explain and justify the reasons or allocating a site within Zone C in the relevant reasoned justification for the allocation’. An allocation should not be made if the consequences of a flooding event, over the lifetime of the development, cannot be effectively managed.

We acknowledge the work that has been done by your Authority and your consultants (URS, formally URS Scott Wilson) in producing a Strategic Flood Consequence Assessment (SFCA) Stage 1 (final report August 2011), Stage 2 (final report August 2011, Addendum January 2012), and Stage 3 (March 2013).

The SFCA has highlighted flood risk as an issue and states that substantial mitigation measures would be required to enable development. The SFCA suggests that these mitigation measures may include raised flood defences, raised ground levels or finished floor levels. However, the viability of delivering these measures is not tested in the SFCA. The SFCA also states that a site specific FCA would be required at the planning application stage. However, this approach is only appropriate where it has already been shown at the development plan stage that the flood risk can be managed. The SFCA has not gone into sufficient detail to enable us to be satisfied that the risks and consequences of flooding, can be managed to an acceptable level, in accordance with TAN15. It has therefore not proven that this site is suitable for inclusion as an allocation within your Plan.

We recommend that either:
1) further work should be carried out to enable your Authority to justify this site allocation with sufficient assessment to demonstrate that risks and consequences can be acceptably managed in line with section 10 of TAN15, or alternatively;
2) Allocation H50 should be deleted and removed from your Plan.

We consider this policy fails to meet Test of Soundness CE2.
### Representation Details

**by:** (No grouping)

Filtered to show: (all of) Stage=L; Status=M

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</table>

The housing proposal complies with the strategy of the LDP. It is a development proposal to bring a parcel of urban brownfield land back into use. The site lies to the south of the Glebelands development allocation within the plan. The addition of this site would result in the regeneration of the industrial land to create a large housing development. The Strategic Flood Consequence Assessment for the LDP noted that substantial mitigation measures would be required to enable development of this site to justify development in line with Part iv of the Justification test in TAN15. Mitigation measures may include raised flood defence, raised ground levels or finished floor levels. Therefore a site specific Flood Consequences Assessment will be required, building on the information of the SFCA. This should incorporate additional information on mitigation of residual risk and emergency planning procedures to ensure escape/evacuation for the lifetime of the development.

---

**3683.L91/H01.55**   
**Natural Resources Wales**   
26/07/2013 O I M

**Document:** Revised LDP, p.68  
**Policy:** H01.55  
**Summary:** Clarity must be put into the plan that any development must retain ecological connectivity or be deleted.

**Item Question**   
**Soundness Test**   
C2, CE1, CE2, CE3

**Representation**   
**H1 (55) Woodland Site, Ringland**

Development at this site is likely to lead to the loss of semi-natural habitats, and reduce habitat connectivity throughout the site into the wider countryside. Given the overallocation of sites to allow for contingency measures in case some sites do not come forward during the Plan period, we recommend that either the site is deleted from the Plan, or if it is retained, provision is made in the Plan to state clearly that any development proposals for the site will be required to retain ecological connectivity throughout the site. (To meet Tests of Soundness C2 and CE1.)

---

**Item Question**   
**Soundness of LDP**

---

**Item Question**   
**Council Responses**

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**Item Question**   
**Speaking at Public Examination**

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**Item Question**   
**Tick-box reply**

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12/02/2014
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Document: Revised LDP, p.65, para.5.4  
Policy: H01  
Summary: Consider the paragraph meets the test of soundness

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<td>11 11</td>
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<tr>
<td></td>
<td>Paragraph 5.4</td>
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<tr>
<td></td>
<td>We welcome the clarification provided in this paragraph and consider it meets Tests of Soundness C2 and CE1.</td>
</tr>
<tr>
<td>12 12</td>
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### Representation Details

**by:** (No grouping)

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**Document:** Revised LDP, p.65, para.5.5-5.7  
**Policy:** H01  
**Summary:** Development at St Cadocs would require HRA and this should be clarified in text

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<td>11</td>
<td>Representation</td>
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<tr>
<td></td>
<td>Paragraphs 5.5 to 5.7: St Cadocs Hospital Site</td>
</tr>
</tbody>
</table>

**We note that the site is identified as a potential windfall site in the Plan. As the text sets out what will be required at the site as part of any future development and the assessments that will be required in support of proposals, given its proximity to the River Usk SAC, we recommend that the Plan also states that development at this site will be subject to a project-level HRA. (To meet Tests of Soundness C2 and CE1.)**

<table>
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<tr>
<th>Item Question</th>
<th>Council Responses</th>
</tr>
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**Item Question**  
**Tick-box reply**  

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**Item Question**  
**Council Responses**  

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<th>Item Question</th>
<th>Council Response</th>
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<tbody>
<tr>
<td>13</td>
<td>The Plan is to be read as a whole and therefore it is not necessary to repeat policy intent. It is considered that policy GP5 provides adequate cover as to the requirements of developers to ensure they consider their impact on ecology. Reference to specific impacts on the River Usk SAC are set out in the Plan as required by the Habitat Regulations Assessment work undertaken on the Plan.</td>
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**Representation Details**

- **Document:** Revised LDP, p.69
- **Policy:** H02
- **Summary:** Consider the policy meets the test of soundness

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<td>Representation H2 Housing Standards; We consider that the policies meet Test of Soundness CE1</td>
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**Item Question** | **Council Responses**
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**Item Question** | **Council Responses**
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### Representation Details

**Rep'n/Para/Policy:** 3683.L96//H09  
**Representor:** Natural Resources Wales  
**Agent:**  
**Accession No:** 26/07/2013  
**Date Lodged:** 26/07/2013  
**Status:** E  
**Source:** S  
**Type:** I  
**Mode:** M  
**Status Modified:**

**Document:** Revised LDP, p.72  
**Policy:** H09  
**Summary:** Consider policy meets test of soundness.

#### Item Question  Representation Text

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<td>11</td>
<td>Representation</td>
<td>H9 Housing Estate Regeneration</td>
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<td>We consider that the policies meet Test of Soundness CE1.</td>
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#### Council Responses

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#### Council Response

Noted.
### Representation Details

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Document: Revised LDP, p.73  
Policy: H10  
Summary: Consider the policy meets the test of soundness.

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</table>
| 11   | Representation | H10 Conversions in the Countryside  
We welcome the reference to protected species and associated environment policies within the policy and supporting text, and consider that it meets Tests of Soundness CE1 and C2. |                     |
| 12   | Speaking at Public Examination | Yes |                     |

### Item Question  
Tick-box reply

<table>
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<td>Representation</td>
<td>H12 Replacement Dwellings in the Countryside; We consider that the policies meet Test of Soundness CE1.</td>
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**Council Responses**

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**Council Response**

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<td>H13 Extensions to Dwellings in the Countryside We consider that the policies meet Test of Soundness CE1.</td>
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**Item Question**

**Council Responses**

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Document: Revised LDP, p. 75
Policy: H15
Summary: Consider the policy meets the test of soundness.

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<td>11</td>
<td>Representation</td>
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<tr>
<td></td>
<td>H15 Gypsy and Traveller Transit Accommodation</td>
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<tr>
<td></td>
<td>We note the changes to the Gypsy and Traveller Sites following the Scrutiny Review Exercise and welcome the proposed sites being located outside of the Gwent Levels SSSIs and the Green Wedge.</td>
</tr>
<tr>
<td></td>
<td>We consider that the policy meet Test of Soundness C2.</td>
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<tr>
<td>12</td>
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<td>Yes</td>
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**Council Responses**

13 Council Response

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<td>Representation</td>
<td>H16 Gypsy and Traveller Residential Accommodation We note the changes to the Gypsy and Traveller Sites following the Scrutiny Review Exercise and welcome the proposed sites being located outside of the Gwent Levels SSSIs and the Green Wedge. However, we have concerns with regards to the following allocation: (see representations 3683.L102-103).</td>
</tr>
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Document: Revised LDP, p.76
Policy: H16
Summary: Welcome allocations being placed outside SSSI area.
Item Question | Representation Text
--- | ---
10 | Soundness Test

C2, CE1, CE2, CE3

11 | Representation

H16(i) Hartridge Farm Road

The proposed site lies partially within Zone C1, as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004). Our Flood Map information, which is updated on a quarterly basis, confirms the site to be within the 0.5% (1 in 200 year) and 0.1% (1 in 1000 year) annual probability flood outlines.

TAN15 (Section 10) is clear, “allocations should only be made in Zone C if it can be justified that a development/use has to be located there in accordance with section 6 and if the consequences of locating development are acceptable, in accordance with section 7 and appendix 1. The local planning authority “will need to fully explain and justify the reasons for allocating a site within Zone C in the relevant reasoned justification for the allocation”.

Where a site falls partially within Zone C it will be a matter for the planning authority to judge whether to apply the tests contained in Section 6 of TAN15, although it is probable that an assessment will be required. An allocation should not be made if the consequences of a flooding event, over the lifetime of the development, cannot be effectively managed.

Housing Policy H17 (iii) also comments that Gypsy and Traveller Caravan sites will be allowed provided that the site is not within areas at high risk of flooding.

Our view is that for allocation H16 (i) there is insufficient detail to enable us to advise you that the risks and consequences of flooding can be managed to an acceptable level and in accordance with TAN15.

Should you wish to allocate this site, further work should be carried out to enable your Authority to justify the site allocation with sufficient assessment to demonstrate that risks and consequences can be acceptably managed. Alternatively you may wish to consider amending the boundary to exclude all land identified as being at flood risk or removing the allocation from your Plan.

We therefore recommend that either;

i) further work should be carried out to enable your Authority to justify this site allocation with sufficient assessment to demonstrate that risks and consequences can be acceptably managed in line with TAN15; or alternatively,

ii) the boundary of H16 (i) should be amended to exclude all land identified as being at flood risk; or

iii) Allocation H16 (i) should be deleted and removed from your Plan.

We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public.

We consider that the policy fails to meet Test of Soundness CE1.
There are no flood risk issues at Hartridge Farm Road providing a buffer is left at the southern edge of the site adjacent to the railway. Natural Resources Wales was directly consulted as part of the Scrutiny Committee process.

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<thead>
<tr>
<th>Item</th>
<th>Question</th>
<th>Representation Text</th>
</tr>
</thead>
<tbody>
<tr>
<td>10</td>
<td>Soundness Test</td>
<td>C2, CE1, CE2, CE3</td>
</tr>
<tr>
<td>11</td>
<td>Representation</td>
<td>H17 Gypsy and Traveller Accommodation Proposals</td>
</tr>
<tr>
<td></td>
<td></td>
<td>We consider that the policy meets Test of Soundness CE1.</td>
</tr>
<tr>
<td>12</td>
<td>Speaking at Public Examination</td>
<td>Yes</td>
</tr>
<tr>
<td>2</td>
<td>Soundness of LDP</td>
<td></td>
</tr>
<tr>
<td>3683.L103//H17</td>
<td>Natural Resources Wales</td>
<td>26/07/2013</td>
</tr>
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</table>

Document: Revised LDP, p.76
Policy: H17
Summary: Consider the policy to meet the test of soundness.

<table>
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<tr>
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<th>Question</th>
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</thead>
<tbody>
<tr>
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</tr>
<tr>
<td>2</td>
<td>Soundness of LDP</td>
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</tr>
</tbody>
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Support noted.
Representation Details

by: (No grouping)

Filtered to show: (all of) Stage=L; Status=M

Rep'n/Para/Policy Representor

Document: Revised LDP, p.79

Policy: EM01

Summary: Note the deletion of sites within SSSI concerns remain with site which remains in SSSI.

<table>
<thead>
<tr>
<th>Item</th>
<th>Question</th>
<th>Representation Text</th>
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<tbody>
<tr>
<td>10</td>
<td>Soundness Test</td>
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</tr>
<tr>
<td>11</td>
<td>Representation</td>
<td>EM1 Employment Land Allocations</td>
</tr>
</tbody>
</table>

We note the revised allocation of 168 hectares of employment land proposed in Policy EM1 and Policy SP17. Although we welcome the amendments to the boundaries for allocations EM1(i) and EM1(ii), we are concerned to note there will still be a direct loss of an area of the Gwent Levels – St Brides SSSI arising from employment allocation EM1(i). Please see our comments below on individual allocations:

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<thead>
<tr>
<th>Item</th>
<th>Question</th>
<th>Council Response</th>
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<tbody>
<tr>
<td>12</td>
<td>Speaking at Public Examination</td>
<td>Yes</td>
</tr>
<tr>
<td>2</td>
<td>Soundness of LDP</td>
<td>No</td>
</tr>
</tbody>
</table>

Large areas of employment land which fell within SSSIs/SINCs have been removed from the Plan. However, some areas still exist. The Council has to strike a balance between promoting economic growth and preserving environmental landscapes and this is what we believe has been achieved. With regard to employment land allocations still within SSSI, the Council will expect developers to provide sufficient mitigation to minimise the disruption to flora and fauna in these areas. This is clearly set out within the Plan.

The allocation of employment land in EM2 is not necessarily new net employment land. For example, Crindau and Llanwern Former Tipping Area already have industry located on them. The areas are considered to detract from the local environment and therefore in need of regeneration. Therefore regeneration proposals which come forward would not be generating net additional employment land. They would be replacing what’s already there with more modern business facilities with would regenerate the area. As a result, the noted ‘over provision’ of employment land is not as significant as the representation reports.

The largest area of remaining SSSI is within the EM1 Duffryn allocation. This area is part of a Welsh Government draft masterplan that is being prepared and will encourage employment to the area. A significant proportion of this SSSI is already occupied by a waste water treatment works and a National Grid substation.
### Representation Details

**by:** (No grouping)

**Filtered to show:** (all of) Stage=L; Status=M

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<tr>
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<th>Date Lodged</th>
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<td>26/07/2013</td>
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</table>

**Document:** Revised LDP, p.79  
**Policy:** EM01.01

**Summary:** Concern over allocation within the SSSI.

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<th>Item Question</th>
<th>Representation Text</th>
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<tbody>
<tr>
<td>10 Soundness Test</td>
<td>C2, CE1, CE2, CE3</td>
</tr>
<tr>
<td>11 Representation</td>
<td>EM 1(i) – Duffryn</td>
</tr>
</tbody>
</table>

Development at this location will lead to the direct loss of an area of the Gwent Levels- St Brides SSSI, and also has the potential for further loss and damage to its features over a wider area of the SSSI, as water from this area feeds the rest of the SSSI.

We consider the allocation of SSSI for employment purposes to be contrary to national policy and Tests of Soundness CE1, CE2 and C2.

The Wildlife and Countryside Act 1981 (as amended) places a duty on your Authority to take reasonable steps to further the conservation and enhancement of the features of SSSIs for which it is of special scientific interest. The loss of part of the site for employment purposes, particularly when there are other alternatives available, would clearly be contrary to that duty. We recommend that the allocation is deleted from the plan or the allocation boundary modified to ensure none of the allocation is located within the SSSI (in order to meet Tests of Soundness C2, CE1 and CE2).

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<th>Item Question</th>
<th>Council Responses</th>
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<tbody>
<tr>
<td>12 Speaking at Public Examination</td>
<td>Yes</td>
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</table>

Large areas of employment land which fell within SSSIs/SINCs have been removed from the Plan. However, some areas still exist. The Council has to strike a balance between promoting economic growth and preserving environmental landscapes and this is what we believe has been achieved. With regard to employment land allocations still within SSSI, the Council will expect developers to provide sufficient mitigation to minimise the disruption to flora and fauna in these areas. This is clearly set out within the Plan.

The largest area of remaining SSSI is within the EM1 Duffryn allocation. This area is part of a Welsh Government draft masterplan that is being prepared and will encourage employment to the area. A significant proportion of this SSSI is already occupied by a waste water treatment works and a National Grid substation.
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<td>10</td>
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<td>C2, CE1, CE2, CE3</td>
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<td>Representation</td>
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<td></td>
<td>Paragraph 6.7</td>
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<td>Please see comments to SP18 (ii) and (iii) above.</td>
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<td></td>
<td>We are concerned that no reference is made to the Gwent Levels- St Brides SSSI and the requirement to conserve and enhance the SSSI features as a key consideration of any future strategic employment proposals for this site. We strongly recommend that paragraph 6.6 from the previous version of the Plan is reinstated at this point in the text.</td>
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<td>12</td>
<td>Speaking at Public Examination</td>
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<th>Item Question</th>
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<th>Council Responses</th>
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<tbody>
<tr>
<td>13</td>
<td>Agree to add reference to the SSSI</td>
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3683.L106/6.7/EM
Natural Resources Wales

Document: Revised LDP, p.79, para.6.7
Policy: EM01.01
Summary: Recommend further text to clarify that development does not affect SSSI
<table>
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<th>Item</th>
<th>Representation Text</th>
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<tr>
<td>10</td>
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<tr>
<td>11</td>
<td><strong>Representation</strong> EM1(ii) – East of Queensway Meadows We welcome the removal of a large area of Gwent Levels – Nash and Goldcliff SSSI from employment allocation EM1(ii) whereby none of this allocation is now located within the SSSI. However, there is potential for indirect loss and damage to SSSI features over a wider area of the Gwent Levels SSSIs. This area of the Gwent Levels - Nash and Goldcliff SSSI is the lowest part of the Caldicot Levels from which water feeds into the wider SSSI area. Changes to the hydrological regime at this location, or pollution entering the SSSI at this location, have the potential to have a significant adverse impact on wider areas of the SSSI and the adjacent Gwent Levels – Whitson SSSI. We therefore recommend reference to the SSSI is included and that the supporting text should also state that proposals will be required to demonstrate how potential adverse impacts on the adjacent Gwent Levels - Nash and Goldcliff SSSI have been avoided or mitigated. (To meet Test of Soundness C2.)</td>
</tr>
<tr>
<td>12</td>
<td>Speaking at Public Examination Yes</td>
</tr>
<tr>
<td>2</td>
<td>Soundness of LDP No</td>
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As the SSSI has been removed from this allocation, it is not considered necessary to make reference to it.
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<td>C2, CE1, CE2, CE3</td>
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<td>11</td>
<td>Representation</td>
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<tr>
<td></td>
<td>Paragraph 6.9</td>
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<td></td>
<td>Please see comments to SP18 (ii) and (iii) above.</td>
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<td>Additionally, the reference to paragraph 2.61 should be amended to read 2.56.</td>
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<td>Speaking at Public Examination</td>
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<td>Yes</td>
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<td>Soundness of LDP</td>
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<td>No</td>
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<td>13</td>
<td>Council Response</td>
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<td></td>
<td>Amend paragraph number as a factual change.</td>
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</tbody>
</table>

Document: Revised LDP, p.79, para.9.6
Policy: EM01.02
Summary: Amendment to paragraph numbering within text.
### Representation Details

by: (No grouping)  
Filtered to show: (all of) Stage=L; Status=M  
Rep'n/Para/Policy Representer Agent Accession No Date Lodged Late? Source Type Mode Status Status Modified

| 3683.L109/EM01. | Natural Resources Wales | | 26/07/2013 | E | O | I | M |

Document: Revised LDP, p.79  
Policy: EM01.04  
Summary: Support text to be amended to ensure development does not have an adverse affect on SSSI, amend paragraph numbering.

<table>
<thead>
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<th>Item Question</th>
<th>Representation Text</th>
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</table>
| 10 10 | Soundness Test  
C2, CE1, CE2, CE3 |
| 11 11 | Representation  
EM1(iv) – Solutia  
Paragraphs 6.11 and 6.12  
Please see comments to SP18 (ii) and (iii) above. Additionally to meet Test of Soundness C2 and ensure there are no adverse impacts on nationally designated sites, the supporting text should also state that proposals will be required to demonstrate how potential adverse impacts on the adjacent Gwent Levels - Nash and Goldcliff SSSI have been avoided or mitigated.  
Additionally, the reference in paragraph 6.12 to paragraphs 2.55 should be amended to read 2.69. |
| 12 12 | Speaking at Public Examination  
Yes |

Soundness of LDP  
No

<table>
<thead>
<tr>
<th>Item Question</th>
<th>Council Responses</th>
</tr>
</thead>
</table>
| 13 13 | Council Response  
Large areas of employment land which fell within SSSIs/SINCs have been removed from the Plan. However, some areas still exist. The Council has to strike a balance between promoting economic growth and preserving environmental landscapes and this is what we believe has been achieved. With regard to employment land allocations still within SSSI, the Council will expect developers to provide sufficient mitigation to minimise the disruption to flora and fauna in these areas. This is clearly set out within the Plan.  
The allocation of employment land in EM2 is not necessarily new net employment land. For example, Crindau and Llanwern Former Tipping Area already have industry located on them. The areas are considered to detract from the local environment and therefore in need of regeneration. Therefore regeneration proposals which come forward would not be generating net additional employment land. They would be replacing what’s already there with more modern business facilities which would regenerate the area. As a result, the noted ‘over provision’ of employment land is not as significant as the representation reports.  
The largest area of remaining SSSI is within the EM1 Duffryn allocation. This area is part of a Welsh Government draft masterplan that is being prepared and will encourage employment to the area. A significant proportion of this SSSI is already occupied by a waste water treatment works and a National Grid substation. |

12/02/2014
**Representation Details**

<table>
<thead>
<tr>
<th>Rep'n/Para/Policy</th>
<th>Agent</th>
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Document: Revised LDP, p.81  
Policy: EM02.02  
Summary: Recommend reference to site's location adjacent to SSSI.

### Item Question  Representation Text

<table>
<thead>
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<th>Item</th>
<th>Question</th>
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<tbody>
<tr>
<td>10</td>
<td>Soundness Test</td>
</tr>
</tbody>
</table>
| 11   | Representation  
EM2 Regeneration Sites  
EM2(ii) Llanwern Former tipping Area, South of Queensway  
NRW are aware that the Llanwern site currently operates a closed system with a dedicated outfall system into the Severn Estuary, which avoids discharge into the Gwent Levels - Nash & Goldcliff SSSI. We consider that this provision should be retained as part of any new development at the site. We therefore recommend that the supporting text of the policy in paragraphs 6.16 and 6.17 clearly states that for any new proposals that come forward for development at the Llanwern allocation, the developer will be required to demonstrate how potential adverse impacts on the Gwent Levels - Nash & Goldcliff and Gwent Levels - Whitson SSSIs are to be avoided or mitigated, and demonstrate how current mitigation measures at the site will be incorporated into any new development.  
A similar statement regarding the outfall pipe should be included for other sites in the Plan with similar issues. |

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<th>Question</th>
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<tr>
<td>12</td>
<td>Speaking at Public Examination</td>
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</table>

**Council Response**

It is considered that Policy GPS provides sufficient protection for this site.
Representation Details

by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M

Rep’n/Para/Policy     Representor    Agent    Accession No    Date Lodged    Late?    Source    Type    Mode    Status    Status Modified

3683.L111//EM02. Natural Resources Wales

Document: Revised LDP, p.81
Policy: EM02.07
Summary: Further work is required to justify the allocation or proposed deletion.

<table>
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<th>Item</th>
<th>Question</th>
<th>Representation Text</th>
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<tr>
<td>10</td>
<td>Soundness Test</td>
<td>C2, CE1, CE2, CE3</td>
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</table>

Policy EM2 Regeneration sites encourages the re-development of a number of sites. Policy EM2 (vii) requires a regeneration scheme to include 10 hectares for B1, commercial, leisure, residential uses.

The residential use renders the allocation as being categorised as highly vulnerable in TAN15. The vulnerability of a mixed use proposal will be defined by the most vulnerable use (paragraph 5.2 of TAN15). This site is located within Zone C1, as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004). Our Flood Map information, which is updated on a quarterly basis, confirms the site to be within the 1% (1 in 100 year) and 0.1% (1 in 1000 year) annual probability fluvial flood outlines of the River Usk, a designated main river.

Section 6.22 of your Plan recognises that the site is at a significant level of flood risk. We acknowledge the work that has been done by your Authority and your consultants (URS, formally URS Scott Wilson) in producing a Strategic Flood Consequence Assessment (SFCA) Stage 1 (final report August 2011), Stage 2 (final report August 2011, Addendum January 2012), and Stage 3 (March 2013). The SFCA states that during all nine flood scenarios that have been assessed the flood hazard rating at the site would be either ‘significant’ or ‘extreme’. Based on these flood hazard ratings and depths of flooding at the site, the Stage 3 SFCA states that substantial mitigation measures would be required to enable development of this site. However, the viability of delivering these mitigation measures is not tested in the SFCA. The SFCA states that during all nine flood scenarios that have been assessed the flood hazard rating at the site would be either ‘significant’ or ‘extreme’.

Our advice is that the SFCA has not gone into sufficient detail to enable us to be satisfied that the risks and consequences of flooding, can be managed to an acceptable level, in accordance with TAN15. It has therefore not proven that this site is suitable for inclusion as a regeneration allocation within your Plan.

We recommend that either;
(i) further work should be carried out to enable your Authority to justify this site allocation with sufficient assessment to demonstrate that risks and consequences can be acceptably managed, in line with section 10 of TAN15, or alternatively;
(ii) The allocation should be removed from your Plan.

We trust that we will have further dialogue with your Authority in attempts to resolve such matters and seek agreement prior to examination in public.

We consider that the allocation of the site fails to meet Test of Soundness CE2.

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<th>Item</th>
<th>Question</th>
<th>Tick-box reply</th>
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<tbody>
<tr>
<td>12</td>
<td>Speaking at Public Examination</td>
<td>Yes</td>
</tr>
<tr>
<td>2</td>
<td>Soundness of LDP</td>
<td>No</td>
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</table>

12/02/2014
The Council appreciates that the area of land is within C1 flood risk. The Council consider that housing would be acceptable in this area, providing an appropriate flood mitigation scheme is implemented. It is understood that any flood mitigation scheme would be significant and therefore may render any housing scheme as unviable. Therefore Crindau does not contain a formal housing allocation and the Council is not relying on Crindau to meet our housing demand figures. Other land uses, such as commercial and leisure are considered less vulnerable and may be more suited to this site. It is considered that the supporting text to policy EM2 vii covers this.

---

**Item Question**: Council Response

**Representation Text**

The Employment Land Review: Final Report (March 2013) suggests that the level of employment land allocated under Policy SP 17 represents a provision that is very likely to be a maximum delivery rate for Newport in the future, and includes an allowance for optimistic one off inward investment. It is unclear therefore why a further 200ha of employment land is allocated under Policy EM3 for B Class Uses, as this makes provision for a level of employment land totalling 368ha, which seems to significantly exceed what can be realistically delivered within the Plan period. We therefore have concerns regarding the realistic delivery of this level of employment land during the Plan period and query how it meets Test of Soundness CE2.

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**Item Question**: Speaking at Public Examination

**Tick-box reply**

Yes

---

**Item Question**: Soundness of LDP

**Tick-box reply**

No

---

Policy EM3 does not allocate an additional 204ha of employment land. It simply notes that the current Docks is 204ha in size, and there is some surplus land within the Docks. Any development which complements or does not hinder the operational use of the port will be supported.
### Representation Details

**Document**: Revised LDP, p.83, para.6.28  
**Policy**: EM03  
**Summary**: Welcome reference to European sites.

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<td>11</td>
<td>Representation</td>
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<td></td>
<td>Paragraph 6.28</td>
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<tr>
<td></td>
<td>We welcome the inclusion of supporting text regarding the River Usk SAC and the Severn Estuary European Sites.</td>
</tr>
<tr>
<td>12</td>
<td>Speaking at Public Examination</td>
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**Council Responses**

**Support Noted.**

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12/02/2014
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<th>Rep'n/Para/Policy</th>
<th>Representor</th>
<th>Agent</th>
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Document: Revised LDP, p.84
Policy: EM04
Summary: Consider that the policy meets the test of soundness.

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<td>EM4 Alternative uses of Employment Land</td>
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<thead>
<tr>
<th>Item Question</th>
<th>Council Responses</th>
</tr>
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<tbody>
<tr>
<td>2</td>
<td>Soundness of LDP</td>
</tr>
<tr>
<td></td>
<td>No</td>
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</table>

Support noted.
Natural Resources Wales

Document: Revised LDP, p.86
Policy: T01
Summary: Suggest deletion of site due to its impact on SSSI.

10 10 Soundness Test
C2, CE1, CE2, CE3

11 11 Representation
T1 Railways

The proposed station at Coedkernew is located in the Gwent Levels – St Brides SSSI. The Wildlife and Countryside Act 1981 (as amended) places a duty on your Authority to take reasonable steps to further the conservation and enhancement of the features of the SSSIs which are the special scientific interest.

We consider that development at this proposed location will lead to the direct loss of an area of the SSSI, and given the interconnected nature of the drainage system has the potential to adversely affect the features of a wider area of the SSSI. We therefore consider a station at this location to be contrary to national legislation and planning policy and contrary to Test of Soundness C2. We request that the allocation is deleted from the SSSI, and an alternative location representing a greater local need outside any of the Gwent Levels SSSIs be considered.

12 12 Speaking at Public Examination
Yes

2 2 Soundness of LDP
No

The site is proposed as part of the Regional Transport Plan to serve east Newport and the Coedkernew Industrial/Business area. Section 7.9 of Policy T1 outlines the steps to be taken to mitigate the impact upon Pencoed Reen. Furthermore Policy GP5 Section 3.23 states that developers must demonstrate the case for development, and that any development will be closely scrutinised for any direct or indirect effects on SSSIs. The Coedkernew station allocation should therefore remain in the LDP as it forms part of the Regional Transport Plan, and Policy GP5 ensures that any proposals have to demonstrate how they avoid and mitigate negative impacts on areas of nature conservation.
<table>
<thead>
<tr>
<th>Item</th>
<th>Question</th>
<th>Representation Text</th>
</tr>
</thead>
<tbody>
<tr>
<td>10</td>
<td>10</td>
<td>Soundness Test C2, CE1, CE2, CE3</td>
</tr>
<tr>
<td>11</td>
<td>11</td>
<td>Representation Paragraph 7.9 Please see comments to SP18 (ii) and (iii) above. Reference to paragraph 2.55 should be amended to 2.56. We welcome the provision of a new station at Llanwern, which should assist in more sustainable travel patterns for associated residential and employment areas and alleviate traffic congestion in the area.</td>
</tr>
<tr>
<td>12</td>
<td>12</td>
<td>Speaking at Public Examination Yes</td>
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**Council Responses**

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<th>Question</th>
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<tr>
<td>13</td>
<td>13</td>
<td>Council Response Change para ref in 7.9 from 2.55 to 2.56.</td>
</tr>
<tr>
<td>Item</td>
<td>Question</td>
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<td>10</td>
<td>Soundness Test</td>
<td>C2, CE1, CE2, CE3</td>
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<tr>
<td>11</td>
<td>Representation</td>
<td>T2 Heavy Commercial Vehicle Movements; We consider that the policies meet Test of Soundness CE1.</td>
</tr>
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Council Responses

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## Representation Details

**Document:** Revised LDP, p.89  
**Policy:** T05  
**Summary:** Consider the policy to meet the test of soundness.

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<td>C2, CE1, CE2, CE3</td>
</tr>
<tr>
<td>11</td>
<td>Representation</td>
</tr>
<tr>
<td></td>
<td>T5 Walking and Cycling; We consider that the policies meet Test of Soundness CE1.</td>
</tr>
<tr>
<td>12</td>
<td>Speaking at Public Examination</td>
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**Council Responses**

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**Representation Details**

**Natural Resources Wales**

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Document: Revised LDP, p.89  
Policy: T06  
Summary: Consider the policy to meet the tests of soundness.

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| 10 10 | Soundness Test  
C2, CE1, CE2, CE3 |

<table>
<thead>
<tr>
<th>Item Question</th>
<th>Representation Text</th>
</tr>
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</table>
| 11 11 | Representation  
T6 Public Rights of Way Improvement;  
We consider that the policies meet Test of Soundness CE1. |

<table>
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<th>Item Question</th>
<th>Representation Text</th>
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</thead>
</table>
| 12 12 | Speaking at Public Examination  
Yes |

<table>
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<th>Representation Text</th>
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</table>
| 2 2 | Soundness of LDP  
No |

**Council Responses**

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<th>Item Question</th>
<th>Representation Text</th>
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| 13 13 | Council Response  
Support noted. |
### Representation Details

**Document:** Revised LDP, p.90  
**Policy:** T07  
**Summary:** Consider the policy to meet test of soundness.

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<tr>
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<td>C2, CE1, CE2, CE3</td>
</tr>
<tr>
<td>11</td>
<td>Representation</td>
</tr>
</tbody>
</table>
|               | T7 Public Rights of Way and New Development  
|               | We consider that the policies meet Test of Soundness CE1. |
| 12            | Speaking at Public Examination | Yes |

**Item Question**  
**Tick-box reply**  

<table>
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<th>2</th>
<th>Soundness of LDP</th>
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**Item Question**  
**Council Responses**  

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### Representation Details

**Document:** Revised LDP, p.90  
**Policy:** T08  
**Summary:** Amend wording to note that Wales Coastal Path has been completed.

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<tr>
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<td>C2, CE1, CE2, CE3</td>
</tr>
<tr>
<td>11</td>
<td>Representation</td>
</tr>
<tr>
<td></td>
<td>T8 All Wales Coast Path</td>
</tr>
</tbody>
</table>

We welcome the inclusion of a policy to protect the Wales Coast Path, and the provision for additional linked routes, and consider that it meets Test of Soundness CE1. However, we recommend that paragraph 7.23 is amended to provide an updated position that the Wales Coast Path has been completed.

We also recommend that the policy and the supporting text should refer to the 'Wales Coast Path', rather than the 'All Wales Coast Path' to refer to the correct title of the route.

<table>
<thead>
<tr>
<th>Item Question</th>
<th>Council Responses</th>
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<tbody>
<tr>
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<td>13</td>
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Support noted.
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<tbody>
<tr>
<td>10</td>
<td>Soundness Test</td>
<td>C2, CE1, CE2, CE3</td>
</tr>
<tr>
<td>11</td>
<td>Representation</td>
<td>R9 Small Scale Retail Proposals. We consider that the policies meet Tests of Soundness CE1 and C2.</td>
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<tr>
<td>12</td>
<td>Speaking at Public Examination</td>
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**Item Question**: 2
**Soundness of LDP**: No

**Council Responses**

- Comments noted.
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<th>Representation Text</th>
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<tbody>
<tr>
<td>10</td>
<td>Soundness Test</td>
<td>C2, CE1, CE2, CE3</td>
</tr>
<tr>
<td>11</td>
<td>Representation</td>
<td>R11 New Out of Centre Retail Sites; We consider that the policies meet Tests of Soundness CE1 and C2.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Item</th>
<th>Question</th>
<th>Council Responses</th>
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<tr>
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**Natural Resources Wales**

Document: Revised LDP, p.101

Policy: R11

Summary: Consider the policy meets the test of soundness.

Comments noted.
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<th>Agent</th>
<th>Accession No</th>
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<td></td>
<td>26/07/2013</td>
<td>E</td>
<td>S</td>
<td>I</td>
<td>M</td>
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Document: Revised LDP, p.102
Policy: R12

Summary: Consider the policy to meet the test of soundness.

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<tr>
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<td>C2, CE1, CE2, CE3</td>
</tr>
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<td>Representation</td>
</tr>
<tr>
<td></td>
<td>R12 Development of Existing Out-of-Centre Retail Sites</td>
</tr>
<tr>
<td></td>
<td>We consider that the policies meet Tests of Soundness CE1 and C2.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Item Question</th>
<th>Representation Text</th>
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<th>Tick-box reply</th>
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<td>Soundness of LDP</td>
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<th>Council Responses</th>
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<td>Council Response</td>
</tr>
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### Representation Details

**Rep'n/Para/Policy** | **Representor** | **Accession No** | **Date Lodged** | **Agent** | **Status**
--- | --- | --- | --- | --- | ---
3683.L125//CF01 | Natural Resources Wales | 26/07/2013 | E | S | I | M

**Document:** Revised LDP, p.105  
**Policy:** CF01  
**Summary:** Consider the policy to meet the test of soundness.

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<tbody>
<tr>
<td>10</td>
<td>Soundness Test</td>
<td>C2, CE1, CE2, CE3</td>
</tr>
<tr>
<td>11</td>
<td>Representation</td>
<td>CF1 Protection of Playing Fields, Land and Buildings Used for Leisure, Sport, Recreation and Play; We consider that the policies meet Test of Soundness CE1.</td>
</tr>
<tr>
<td>12</td>
<td>Speaking at Public Examination</td>
<td>Yes</td>
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</tbody>
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**Item Question** | **Council Responses**
--- | ---
2 | Soundness of LDP | No

13 | Council Response | Support noted.

12/02/2014
<table>
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<th>Question</th>
<th>Tick-box reply</th>
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<tr>
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<td>Soundness Test</td>
<td>C2, CE1, CE2, CE3</td>
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<tr>
<td>11</td>
<td>Representation</td>
<td>CF2 Outdoor Play Space Requirements; We consider that the policies meet Test of Soundness CE1.</td>
</tr>
<tr>
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<td>Speaking at Public Examination</td>
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<tr>
<td>2</td>
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**Council Responses**

13  Council Response

Support noted.
### Representation Details

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Document: Revised LDP, p.106
Policy: CF03

Summary: Consider the policy to meet the test of soundness.

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<td>11</td>
<td>Representation</td>
</tr>
<tr>
<td></td>
<td>CF3 Water Based Recreation; We consider that the policies meet Test of Soundness CE1.</td>
</tr>
<tr>
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Support noted.
Document: Revised LDP, p.107
Policy: CF04
Summary: Consider the policy to meet the test of soundness.

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<th>Representation Text</th>
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<td>10 10</td>
<td>Soundness Test C2, CE1, CE2, CE3</td>
</tr>
<tr>
<td>11 11</td>
<td>Representation CF4 Riverfront Access; We consider that the policies meet Test of Soundness CE1.</td>
</tr>
<tr>
<td>12 12</td>
<td>Speaking at Public Examination Yes</td>
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<th>Council Responses</th>
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Support noted.
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<td>11</td>
<td>Representation</td>
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<tr>
<td></td>
<td>CF5 Usk and Sirhowy Valley Walks; We consider that the policies meet Test of Soundness CE1.</td>
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<td>Speaking at Public Examination</td>
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**Council Responses**

Support noted.
**Representation Details**

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<tr>
<td>CF6 Allotments</td>
<td>We consider that the policies meet Test of Soundness CE1.</td>
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**Item Question**  
**Tick-box reply**

| 2    | 2        | Soundness of LDP    |
|      |          | No                  |

**Item Question**  
**Council Responses**

| 13   | 13       | Council Response    |
|      |          | Support noted.      |
Summary: Consider the policy to meet the test of soundness and highlight a typographical error.

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<tr>
<td>11 11</td>
<td>Representation</td>
</tr>
<tr>
<td>CF7 Horse Related Developments</td>
<td></td>
</tr>
<tr>
<td>We consider that the policy meets Test of Soundness C2. However, there seems to be a typographical error in criterion (iii) and suggest that it is amended to read: &quot;…classified as a rural enterprise dwelling&quot;.</td>
<td></td>
</tr>
<tr>
<td>12 12</td>
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<td>Yes</td>
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<td>13 13</td>
<td>Support and error noted. Policy text will be corrected.</td>
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<tr>
<td>Item</td>
<td>Question</td>
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<tr>
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<tr>
<td>10</td>
<td>Soundness Test</td>
</tr>
<tr>
<td>11</td>
<td>Representation</td>
</tr>
<tr>
<td>CF8 Tourism</td>
<td>We consider that the policy, together with the clarification provided in paragraph 9.33 in relation to development in the countryside, meet Tests of Soundness C2 and CE1.</td>
</tr>
<tr>
<td>12</td>
<td>Speaking at Public Examination</td>
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**Council Response**

Support noted.
## Representation Details

by: (No grouping)  
Filtered to show: (all of) Stage=L; Status=M  
Rep'n/Para/Policy | Representer | Agent | Accession No | Date Lodged | Late? | Source | Type | Mode | Status | Status Modified
---|---|---|---|---|---|---|---|---|---|---
3683.L133//CF09 | Natural Resources Wales | | | 26/07/2013 | | | | | | |

### Document: Revised LDP, p.109

**Policy:** CF09  
**Summary:** Require additional text to ensure integrity of European Protected Species on the site.

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<th>Question</th>
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</tr>
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<tr>
<td>11</td>
<td>Representation</td>
<td>CF9 Celtic Manor</td>
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</table>

We are aware that dormice, a European protected species, are present at this location. However, their presence is not recognised in the supporting text of the policy. To ensure the plan provides enough information to adequately inform the future implementation of the policy, we recommend that paragraph 9.37 should clarify that proposals will be required to ensure the Favourable Conservation Status of the species and comply with the Conservation of Habitats and Species Regulations 2010 (as amended). (To meet Tests of Soundness C2 and CE1)

We welcome the requirement in the policy for a masterplan to be prepared for the site, and for future development at the site to be consistent with it.

<table>
<thead>
<tr>
<th>Item</th>
<th>Question</th>
<th>Council Responses</th>
</tr>
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<tr>
<td>13</td>
<td>Council Response</td>
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</table>

It is not considered necessary to make the suggested amendment, since the presence of dormice at this site may be highlighted and addressed during the development-management process.
**Representation Details**

**Document:** Revised LDP, p.110  
**Policy:** CF10  
**Summary:** Consider the policy to meet the test of soundness.

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<td>CF10 Commercial Leisure Developments; We consider that the policies meet Test of Soundness CE1.</td>
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**Item Question**  
**Tick-box reply**  

| 2 2 | Soundness of LDP | No |

**Item Question**  
**Council Responses**  

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Document: Revised LDP, p.111
Policy: CF11
Summary: Consider the policy to meet the test of soundness.

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**Item Question**: Soundness Test
**Representation Text**: C2, CE1, CE2, CE3

**Item Question**: Representation
**Representation Text**: CF11 Outdoor Leisure Developments; We consider that the policies meet Test of Soundness CE1.

**Item Question**: Speaking at Public Examination
**Representation Text**: Yes

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**Item Question**: Soundness of LDP
**Tick-box reply**: No

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**Item Question**: Council Responses
**Council Response**: Support noted.
### Representation Details

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**Document:** Revised LDP, p.112

**Policy:** CF12

**Summary:** Consider the policy to meet the test of soundness,

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**Item Question** | **Representation Text**
---|---
10 | Soundness Test
11 | Representation
   | CF12 Protection of Existing Community Facilities
   | We consider that the policies meet Test of Soundness CE1.
12 | Speaking at Public Examination
   | Yes

**Item Question** | **Council Responses**
---|---
2 | Soundness of LDP
   | No

---

**Support noted.**
Natural Resources Wales

Document: Revised LDP, p.113
Policy: CF13

Summary: Consider whether the school sites should be allocated is it considered premature.

Soundness Test
C2, CE1, CE2, CE3

Deposit Plan Policy CF13, School Sites, seeks to provide new, enlarged and/or enhanced school facilities. Among the sites listed, reference is made to;

(v) Dyffryn High
(vi) Dyffryn Juniors and Infants
(vii) South of Percoed Lane, Dyffryn

Comments made in paragraph 9.56, require that an additional Welsh Primary school is needed in the Plan period and that its exact location will be determined as part of the education provision review, including the appropriate use of Dyffryn High School, Dyffryn Juniors and Infants and the South of Percoed Lane, Dyffryn.

The risk of flooding to school facilities does not appear to be fully explained in the SA and we suggest that such issues should be identified. Whilst we appreciate that proposals will need to be determined in accordance with all aspects of the development plan and national guidance, we are of the view that environmental constraints and opportunities should be explained more fully in the reasoned justification of Policy CF13, School Sites, so that they are taken into account by a proposer/developer. We would also suggest that as part of the educational provision review environmental matters are given due consideration and as early in the process as possible. As this review has not been carried out and it is unclear as to which allocations will be developed, which appears to be result in uncertainty about proposals. Is it premature to include such school sites in your LDP?

From a flood risk management perspective, while we recognise that at least two of these sites are existing establishments, the risks and consequences of flooding must be assessed fully given the high vulnerability nature of proposals and the fact that these existing establishments are already located in an areas considered to be at risk of flooding. The precautionary framework outlined in TAN 15 allows flooding issues to be accorded appropriate consideration whilst recognising that development (existing) will continue to be necessary in these areas. NRW would only support the intensification of such establishments or proposals for new facilities where the risks and consequences of flooding are demonstrated as being managed down to an acceptable level (for people, property and natural heritage), over the lifetime of development.

NRW also recommends that you consider consulting other professional advisors on the acceptability of the developer’s proposals, on matters that we cannot advise you on such as emergency plans (on practicability of rescue, evacuation and where applicable the unavailability of safe access and exit), procedures and mitigation measures to address flooding and/or structural damage.
The Local Planning Authority has a duty to allocate land for education purposes in the LDP, so it is not considered premature to identify the Percoed Lane site as a potential site.

Concerns regarding environmental constraints are noted, though these would ordinarily be identified and addressed at the development-management stage.

The site South of Percoed Reenis is required as there is a need for additional and enhanced school facilities to meet future educational needs.

At the start of Para 9.57 additional explanatory text will be inserted in order to provide clarity on what is required of developers in the event that a planning application is submitted to develop the site.

Any development of the site south of Percoed Reen for education purposes would require specific ecological surveys and any negative effects would need to be avoided, mitigated and compensated.

This is because the site is located in the Gwent Levels, St Brides SSSI.

Developers will be required to consider whether they need to undertake an Environmental Impact Assessment in line with The Town and Country Planning (EIA England and Wales) Regulations 1999.

Under the Habitats Regulations a developer will also be required to carry out a Habitat Regulation Assessment to determine whether the proposal is likely to have significant effects on any of the internationally designated sites found within Newport and within a 15km radius. If this is found to be the case then the developer will be required to submit a statement to inform an appropriate assessment which will be undertaken by the competent authority.

If it is found that the development would lead to adverse effects on biodiversity then the development will not be permitted.

Within the Gwent Levels SSSI, a developer will be required to adhere to the following legislation:
1. The Conservation of Habitats and Species Regulations 2010 (The Habitat Regulations) which implements the EC Birds Directive 2009/147
2. The Wildlife and Countryside Act 1981 (as amended) which implements the EC Birds Directive 2009/147
5. Protection of Badgers Act 1992
6. The Hedgerow Regulations 1997

A developer will also be required to adhere to the following policies, plans and guidance:
2. Convention on Biological Convention
3. Other policies contained within the LDP
4. Newport Local Biodiversity Action Plan (LBAP)
6. Planning Policy Wales PPW 2010
9. NCC Wildlife and Development SPG
10. TAN 15
Document: Revised LDP, p.113
Policy: CF13

Summary: Recommend additional text to clarify that the site is adjacent to SSSI and would therefore have to avoid adverse effects.

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<th>Item Question</th>
<th>Representation Text</th>
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<td>Soundness Test</td>
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<td>CF13(v): Duffryn High</td>
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The site is adjacent to the Gwent Levels - St Brides SSSI. To ensure that the proposal has no adverse impacts on the SSSI and meet Tests of Soundness C2 and CE1, we recommend that the supporting text to the policy is amended to include a clear statement that development will be required to avoid or mitigate potential impacts on the SSSI.

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<tr>
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<th>Council Responses</th>
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<td>Soundness of LDP</td>
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Policy GP5 would address any environmental impact that the Duffryn High site may have on its surroundings. It should also be borne in mind that mitigation measures, should they prove necessary, would be secured at the development-management stage.
Item Question | Representation Text
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10 | Soundness Test
 | C2, CE1, CE2, CE3

Development of a school at this location will result in the direct loss of an area of the Gwent Levels St Brides SSSI. Additionally, given the location of this site and the interconnected nature of the drainage system, development of the site also has the potential for detrimental impacts on the SSSI features over a wider area of the SSSI. Such impacts are likely to include the exacerbation of existing water quality concerns affecting this area of the SSSI.

We note that there is no mention of the SSSI within the policy text, nor any reference to Policy GP5.

In addition, school site CF13 (vii) is located within Zone C1, as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004). Our Flood Map information, which is updated on a quarterly basis, confirms the site to be within the 1% (1 in 100 year) and 0.1% (1 in 1000 year) annual probability flood outlines of the River Ebbw, a designated main river. TAN15 (Section 10) is clear, “allocations should only be made in Zone C if it can be justified that a development/use has to be located there in accordance with section 6 and if the consequences of locating development are acceptable, in accordance with section 7 and appendix 1. The local planning authority ‘will need to fully explain and justify the reasons for allocating a site within Zone C in the relevant reasoned justification for the allocation’.

We acknowledge the work that has been done by your Authority and your consultants (URS, formally URS Scott Wilson) in producing a Strategic Flood Consequence Assessment (SFCA) Stage 1 (final report August 2011), Stage 2 (final report August 2011, Addendum January 2012), and Stage 3 (report dated March 2013).

We have reviewed the Stage 3 SFCA, which includes an assessment of flood risk for Education site CF13 (vii). The report has highlighted flood risk as an issue; however the assessment concludes that the site is suitable for development subject to a site Specific Flood Consequences Assessment (FCA) being undertaken. We do not consider that the Stage 3 SFCA has accurately assessed all sources of flooding for this site allocation. The SFCA has highlighted that the predominant source of flooding is from the River Usk and River Ebbw. We consider that the SFCA has not accurately assessed the risk of flooding from the River Ebbw. Our view is that for Education site CF13 (vii) your SFCA has not gone into sufficient detail to enable us to advise you whether the risks and consequences of flooding can be managed to an acceptable level, in accordance with TAN15. It has therefore not been proven that this site is suitable for inclusion as an allocation in your Plan.

We acknowledge that further work could be carried out which may enable your Authority to justify this site allocation on the basis that flood risks and consequences can be acceptably managed in line with section 10 of TAN15. However, we refer you to our comments above concerning your duties under the Wildlife and Countryside Act 1981 (as amended). We consider that this proposal fails to conserve or enhance the SSSI, and is therefore contrary to national legislation and planning policy and fails to meet Test of Soundness C2. We advise that the allocation be deleted from the SSSI and located at a more appropriate location within the Plan area.

We consider that the policy fails to meet Test of Soundness C2 and CE2.
Policy GP5 would address any environmental impact that the Percoed Lane site may have on its surroundings. It should also be borne in mind that mitigation measures, should they prove necessary, would be secured at the development-management stage.

Natural Resources Wales

Document: Revised LDP, p.114
Policy: M01
Summary: Consider that the policy meets the test of soundness.

Item Question  Soundness Test

C2, CE1, CE2, CE3

We consider that the policy meets Test of Soundness C2, and we welcome the clarification provided in paragraph 10.1 that the identification of safeguarded areas does not necessarily indicate that they may be suitable for working.

Speaking at Public Examination

Yes
Summary: Consider the policy to meet the tests of soundness.

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<th>Representation Text</th>
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| 11            | Representation M3 Oil and Gas; M4 Wharves and Rail

We consider that the policies meet Tests of Soundness CE1.

<table>
<thead>
<tr>
<th>Item Question</th>
<th>Council Responses</th>
</tr>
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<th>Tick-box reply</th>
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## Representation Details

**Document:** Revised LDP, p.116  
**Policy:** M03  
**Summary:** Consider the policy meets the tests of soundness.

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**Council Responses**

| 13   | Council Response | Noted. |
### Representation Details

**Document:** Revised LDP, p.116  
**Policy:** M04  
**Summary:** Consider the policy to meet the tests of soundness.

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| 11   | Representation  
M4 Wharves and Rail  
We consider that the policies meet Tests of Soundness CE1. |
| 12   | Speaking at Public Examination | Yes |

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<th>Item</th>
<th>Question</th>
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**Accession No:** 3683.L143/M04  
**Agent:** Natural Resources Wales  
**Date Lodged:** 26/07/2013  
**Type:** E  
**Mode:** S  
**Status:** I  
**Status Modified:** M
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**Document:** Revised LDP, p.117  
**Policy:** W01  
**Summary:** Consider that the policy meets the tests of soundness.

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<th>Representation Text</th>
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<td>We consider that the policy meet Test of Soundness C2.</td>
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**Item Question**  
**Council Responses**  
**Comments noted.**
### Item Question

**Soundness Test**

C2, CE1, CE2, CE3

**Representation**

W2 Sites for Waste Management Facilities

Our NRW view is that there does not appear to be a logical flow between provision of employment sites and waste management requirements. We seek clarity on a number of aspects as explained below:

Policy W2 Sites for Waste Management Facilities requires that all allocated, permitted and existing B2 industrial sites are identified as potentially suitable locations for new waste management facilities, which are subject to detailed waste assessments, in order to meet the estimated land requirement of up to 12.6 hectares. Comments made in paragraph 10.128 of the Sustainability Appraisal (SA), identifies that the requirement will allow for increased capacity to treat different waste streams.

Policy SP17 requires a provision of 168ha of employment land (which exceeds the minimum requirement of 35ha). Policies EM1, EM2 (regeneration) and EM3 also allow for Class B2 development. Notably Policy EM1 allocates major employment land at six main locations, which provides the 168ha of employment land. Although some of your Plan’s employment sites allow for B2 use, it is not clear to us how these employment sites (EM1, EM2 and EM3) will contribute to the required 12.6 hectares and any increased capacity to treat different waste streams. We seek clarification of this point as well as whether the required provision of 12.6 hectares affects your employment requirements.

While your Plan explains that you have allowed for flexibility in the provision of employment and housing, it is not clear how your Plan will be flexible for the provision of waste facilities and how it will be able to deal with any shortfall in targets. In Section 10 Monitoring Framework of the Revised Deposit Plan and Section 13 Monitoring of the SA those indicators and targets to be monitored are identified. In Section 10 Monitoring Framework, core and local indicators to assess the effectiveness of Objective 10 Waste are included, which are intended to maintain the identified needs of your Plan (12.6 hectares) and Regional Waste Plan. NRW is supportive your future monitoring requirements in relation to waste matters.

We agree that detailed waste assessments will be required from a developer and this will need to take account of more significant environmental impacts. We agree with comments made in the SA, paragraph 10.130, which recognises that as waste developments have different characteristics from housing employment, tourism and retail development and are likely to result in more significant environmental impacts, unless suitably controlled.

### Item Question

**Speaking at Public Examination**

Yes

### Item Question

**Soundness of LDP**

No

### Council Responses
As noted in the representation, the identified employment land requirement for the Plan period is 35ha. EM1 – Employment Land Allocations, identifies 168ha of employment land to meet this need. Of this 168ha, 4 employment sites are allocated for uses including B2 use class. This provides 146ha of land to potentially be used for waste facilities, subject to the detailed consideration of the proposal being put forward and compliance with the other plan policies.

Policy EM2 – Regeneration Sites, lists 3 allocations with B2 as a potential land use option, which equates to 163.5ha.

In addition, Policy W2, in accordance with Welsh Government Guidance, identifies permitted and existing B2 Industrial Sites as being potentially suitable sites for waste facilities. It is acknowledged that existing industrial sites are not quantified in the Plan, however, the Employment Land Review does provide information on this issue and it is the Council’s intention to expand upon this in Supplementary Planning Guidance.

These three forms of land supply provide a potential 309.5ha of allocated land, plus existing B2 Industrial Sites. They contribute to the 12.6 ha of waste land requirement by providing a range and choice of sites that could potentially be used for different waste streams and types of facilities. It is also considered to provide enough flexibility to deal with any increased capacity requirements. The required provision of 12.6ha is not considered to adversely affect/impact on Newport’s employment land requirements given the area of employment land available.

Support for the monitoring mechanism is noted.

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**3683.L146/W03**  
Natural Resources Wales  
26/07/2013  
Document: Revised LDP, p.118  
Policy: W03  
Summary: Consider that the policy meets the test of soundness.

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|      |          | W3 Waste Management Proposals  
|      |          | We consider that the policy meet Test of Soundness C2. |
| 12   | 12       | Speaking at Public Examination | Yes |

**Item Question**  
**Council Responses**

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Document: Revised LDP, p.120
Policy: W04

Summary: Consider the policy meets the tests of soundness.

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<td>10 10 Soundness Test</td>
<td>C2, CE1, CE2, CE3</td>
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<td>11 11 Representation</td>
<td>W4 Provision for Waste Management Facilities in Development We consider that the policy meets Test of Soundness CE1.</td>
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<th>Council Responses</th>
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<td>2 2 Soundness of LDP</td>
<td>No</td>
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12/02/2014
Newport City Council Local Development Plan

Representation Details

Document: Revised LDP, p.121
Policy: Monitoring Framework
Summary: Suggest amended wording to two monitoring indicators.

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<td>Natural Resources Wales</td>
<td></td>
<td>26/07/2013</td>
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**Item Question** | **Representation Text**
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10 | 10 Soundness Test
11 | 11 Representation
12 | Monitoring Framework

Paragraph 12.3

We note the need for continuous monitoring and welcome the preparation of an Annual Monitoring Report by your authority to assess the implementation of the LDP, and the extent to which policies and proposals are being delivered; and to identify any necessary changes should a policy not work or targets not be met.

We note that this will involve the identification of indicators and targets, for which data will be collected, in dialogue with statutory environmental consultees. NRW will be pleased to assist you in this monitoring and in the provision of advice. We suggest that any gaps and difficulties in monitoring be identified, alongside limited resources.

Objective 6: Conservation and the Natural Environment

Whilst we welcome the inclusion of an indicator for SINCs and statutory nature conservation sites, we suggest that the monitoring framework should also monitor the effectiveness of the Plan in protecting statutorily protected species and landscape. We therefore suggest the following are added to the monitoring table:

**Relevant LDP Policies - SP8 SP9 GP5**

Core and Local Indicators - Local Number of planning applications granted which result in the loss of or have an adverse effect on Registered Historic Landscape or a Special Landscape Area

Source of Information - Development Management / NRW/LPA landscape officer

Monitoring Target - No developments permitted contrary to the advice of NRW/LPA landscape officer.

Trigger Point - 1 development permitted contrary to the advice of NRW/LPA landscape officer

**Relevant LDP Policies - GP5**

Core and Local Indicators - Local Number of developments permitted which result in detriment to the favourable conservation status of European protected species, or significant harm to species protected by other statute

Source of Information - Development Management / NRW/LPA ecologist

Monitoring Target - No development permitted contrary to the advice of NRW or the authority's ecologists.

Trigger Point - 1 or more permission granted contrary to the advice of NRW or the authority’s ecologists

12 | Speaking at Public Examination Yes

Item Question | Tick-box reply
--- | ---
2 | Soundness of LDP No

12/02/2014
### Item Question  Council Responses

**13**  
**Council Response**

The Council has set out a broad monitoring process for the required Annual Monitoring Report. The proposed monitoring indicator for measuring the effect on Registered Histroic Landscape is considered to have already been covered by Monitoring Indicator OB5 MT1. Similarly the second suggested indicator for European Protected species is covered by Monitoring indicator OB6MT4.

The suggested indicator for Specil Landscape Areas is not considered appropriate. It is unclear as to what would be measured as having a detrimental impact or loss of SLA area. Development within a SLA would not necessarily have a negative impact or lead to the loss of the SLA as the designation does not preclude development.

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**3683.L149//Glossa**  
Natural Resources Wales  
26/07/2013  
E C I M  

Document: Revised LDP, p.144  
Policy: Glossary  
Summary: Additional advice and comments.

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**Item Question  Representation Text**

**10**  
**Soundness Test**

C2, CE1, CE2, CE3

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**11**  
**Representation**

Additional Advice and Comments

In some of your documents reference is made to The Environment Agency and The Countryside Council for Wales. For example;

- Text within the Table found under paragraph 12.13 (OB1 MT3 Sources of Information)  
- Text within the Table found under paragraph 12.14 (OB2 MT3 Core and Local Indicators; and Monitoring Target)  
- Development and Flood Risk Background Paper June 2013

It would be useful if readers of these documents are made aware that from 1 April 2013, NRW brought together the work of the Countryside Council for Wales, Environment Agency Wales and Forestry Commission Wales, as well as some functions of Welsh Government. Our purpose is to ensure that the natural resources of Wales are sustainably maintained, used and enhanced, now and in the future.

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**12**  
**Speaking at Public Examination**  
Yes

---

**Item Question**  
**Tick-box reply**

**2**  
**Soundness of LDP**  
No

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**Item Question  Council Responses**

**13**  
**Council Response**

Agree to amend Plan to refer to Natural Resources Wales.
### Representation Details

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**Document:** Revised LDP, p.75  
**Policy:** General G&T  
**Summary:** Object to gypsy and traveller sites in Newport.

#### Item Question  Representation Text

11 11 Representation  
Gypsy and Travellers having permanent residence in this area. We strongly object!

#### Item Question  Council Responses

13 13 Council Response  
Objection noted.

<table>
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<tr>
<th>Rep'n/Para/Policy</th>
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**Document:** Revised LDP, p.89  
**Policy:** T05  
**Summary:** Is the Sirhowy Valley proposed to be opened to cyclists?

#### Item Question  Representation Text

11 11 Representation  
Regarding the Deposit LDP, the proposals map indicates a red dotted line as walkway/cycleway. For the section of the Sirhowy Valley walk from the top of Ridgeway Avenue down to the canal (currently walkers only), is it proposed to modify this to become a cycleway?

#### Item Question  Council Responses

13 13 Council Response  
It should be borne in mind that the routes of long-distance walkways/cycle ways shown on the Proposals Map are provisional. For the time being, however, there are no plans to create a cycleway at this location.
Representation Details

by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M
Rep'n/Para/Policy Representor

3690.L1//H15.01 Harrison, Catherine

Document: p.75
Policy: H15.01
Summary: Object to G&T site at Celtic Way, Coedkernew.

Item Question  Representation Text

11 It has come to my attention that Newport City Council is proposing to establish a Transit site for Travellers at Celtic Way, Coedkernew. While I appreciate the council has a legal obligation to provide such facilities for travellers, I regard this proposed location as ill considered. My concerns are as follows:

- Having lived in Newport for many years, for the past nine in the Celtic Horizon development, I have invested in the upkeep, development and maintenance of my property. I believe that the presence of a transit traveller site could affect the value of my property, potentially jeopardising its market value, should I wish to sell my property in the future. My building society, Halifax state that ‘anti-social neighbours’ can shave up to £31,000 off the price of the average property. This would be clearly unacceptable.

- Newport City Council has struggled to secure investment to redevelop its City Centre; it is something of a ghost town in retail terms. Thankfully, I believe that this is now being addressed. However, I understand that local businesses in Coedkernew, Quinn radiators and STS have already raised objections on how the presence of a traveller’s site will affect new business to the area. New investment and jobs are vital for Newport’s continued success. Therefore, the City Council should think long and hard as to the consequences of this site going ahead.

- As services are stretched, has the City Council undertaken an impact assessment as to how an influx of travellers will have on the local health service, local schools and Policing?

- As travellers have passed through this area in the past, many residents have seen the after effects of rubbish left behind and the general disregard for the local environment shown by the visitors. How can the Council assure local residents that travellers will not venture into adjoining fields to extend the provision? Tredegar House and Duffryn playing fields were left in a shocking state following a transit traveller stay. The costs to collect rubbish, repair and implement improved security, all passed to Newport residents. This action results in a distrust of traveller communities and raises grave concerns that this would become the norm.

- Equally, in Coedkernew area, many horses, belonging to the gypsy community have been left to graze in public open spaces. With no regard for the welfare of the horses or drivers using the A48, I would be concerned that with the presence of a transit site, so close to the road network that this would become a regular occurrence. Clearly, one that would create further discourse within the wider community.

I would welcome a response to my correspondence and an indication of alternative proposed sites that the City Council are considering.

Item Question  Council Responses

12/02/2014
Council Response

As with any other significant development, the Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.

The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research has shown that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

The Council has a duty to provide accommodation for the Gypsy/Traveller population. We do not have a duty to provide land for horses. The site will be owned by the Council and there is no intention to allow the occupants to keep horses on site.

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

As this site will only be a transit site for Gypsy/Travellers to temporarily stay, it is unlikely they will seek school places for their children or put pressure on local GPs.
### Representation Details

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**Document:** Revised LDP, p.75  
**Policy:** H15.01  
**Summary:** Object to the G&T site at Celtic Way, Coedkernew.

### Item Question  
**Representation Text**

11

With reference to the proposed Traveller/Gypsy transit site, which Newport Council are proposing to allocate at Celtic Way Coedkernew. I wish to lobby my objection on the grounds of:

- The cost of £6.3 million of taxpayers money.
- Increase crime including antisocial behaviour/burglary.
- Additional noise pollution from dogs and vehicle movements.
- Will deter new business investment in the area and therefore employment.
- Affect regarding businesses, i.e. poor first impressions, which will result in the loss of contracts/trade.
- Reduction in house prices.

### Item Question  
**Council Responses**

13

The Council is aware of the potential financial implications of going ahead with the site.

The Council has liaised with the police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the police if any incidents of crime that relate to the site are reported.

Additional noise from vehicles and dogs is not considered to be a significant issue.

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.
Representation Details
by: (No grouping)
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Document: Revised LDP, p.75
Policy: H15.01
Summary: Objection to proposed Gypsy and Travellers Site at Celtic Way.

Additional material submitted - Please click here
Further to the issue of the Revised LDP and subsequent correspondence with NCC I am writing within the Consultation Period due to expire at 5pm 26th July 2013 to object to the proposal for a Gypsy / Traveller transit site at Celtic Way, Coedkernew, Newport.

Firstly I would like to express how disappointed I am regards to the lack of communication from Newport City Council, Elected Councillors and Coedkernew Committee in not ensuring the wider community were aware of this consultation period. Had it not been for myself speaking to a resident that works at STS this knowledge would never have been conveyed to our wider community. The Welsh Government Planning Aid Community Involvement Scheme states “important as say how community will be involved in ways which respect Travellers Customs, ways of life and build trust”. It is clearly evident that NCC are off to a very bad start regards Community involvement and building trust.

Therefore, my first objection is that this process has been unfair, unjust and despite NCC responses to the contrary has meant that residents and businesses have not been able to utilise the entire 6 weeks to collate and manage effectively a formal and constructive response to the proposal. In addition to above the most proactive weekend for residents to lobby residents to register within the consultation period it would appear the LDP website has been down over the weekend preventing these objections being sent.

I would also like NCC to note that we understand both Councillor Suller and Councillor White approved this proposal without consultation with their constituents. Further to the public outcry at the second NCC LDP presentation on July 17th 2013 at the Civic Centre, they now both expressed their desire to change their minds. This does not reflect from the fact it is our Public Servants not engaging and supporting our community that has resulted in the preposterous idea of a Gypsy Traveller Transit Site being proposed at Celtic Way in a prestigious industrial and residential area.

The first request I ask of NCC is to delete the proposed Traveller Transit Site at Celtic Way from the Revised LDP and would support this request with the following; Objective 1

Objective 1 of the LDP states “to ensure that all developments 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 local communities”.

This proposed brown field site represents a major resource to attract develop businesses and light industry to increase the economic growth of Newport and wider SE Wales. Whilst NCC respond that a designated site will assist with illegal encampments and reduce legal costs to move Travellers onward, this proposed location at Celtic Way will encourage further Gypsy Travellers to visit and park illegally within our community. Whilst NCC have expressed that this site will be managed and secure there is no supporting documentation that provides me with peace of mind that this proposed site will not impact on the community and my home that will be in direct site of the Gypsy Traveller Transit Site. In addition, it may be a coincidence, but during a period 2 years ago when travellers parked directly beyond my garden boundary 4 things were clearly evident Increase in noise and air pollution with dogs, generators and children trying to climb my fence Garden tools went missing including a garden spade and fork. My vehicle door lock was damaged as if the car had tried to be broken into. I could not sleep due to the noise and fear that they may be entering the rear garden and as a single female living alone I asked a friend to stay with me at this time.

Without evidence of NCC having carried out a detailed management, security, impact and risk assessment on this proposed site I strongly oppose this location at Celtic Way.

Business

Objective 3 of the LDP states “to enable a diverse economy that meets the needs of the people of Newport and those of the wider South East Wales economic region”. I / we do not consider the LDP meets the criteria in locating the Gypsy / Traveller transit site at Celtic Way and is in fact contradictory to the LDP as follows; Section 6.5 (page 78) states that “there is a medium sized prestige business park development can be supported at Duffryn”.

Section 6.6 (page 79) states “there is a large scale strategic development area well connected to the M4, containing some of the most prestigious developments in Newport…there are some areas of potential development on this prestigious site”. Section 2.67 (page 33) “the sites in west Newport are close to major arterial routes which make them well connected nationally, regionally and locally. Substantial development has already occurred in the area…business advantages in locating near to similar uses”.

12/02/2014
Newport is an economically deprived area and we are fortunate to have attracted some major employers to the Celtic Springs and Imperial Park Business Parks. This is a Tier 2 Government funded area that attracts companies to S.E.Wales, bringing jobs and rate payers. In 2004 Andrew Davies Minister for Economic Development and Transport stated "Imperial Park marketed world-wide as one of the most attractive sites for industrial development in Wales". Whilst I appreciate this was at the height of LG and significant investment, it is today apparent that this area attracts key prestigious businesses both private and government including Quinn radiators, HMPS, EADS, Go Compare, Target and Next Generation Data who ironically headline their website with a photo of their building and "Nowhere safer". With the business development also brings Retail and Restaurant businesses to serve the local working community.

The Welsh Government describe the area “the best connected business area in Wales” and consider this a preferred location to relocate government office services. John McCooney Finance Director for Quinn Radiator at our Community Meeting expressed how he would not be able to construct a valid business case for further investment in their plant should the Transit Site be developed and potentially even consider relocating with the loss of employment and resulting in a significant impact on the local economy.

There remain vacant buildings and sites available for occupation and it is important that NCC retain the highest quality business environment in order that Newport and S.E.Wales may attract further high quality corporate investors. The proposal to allocate the land at Celtic Way for a proposed Gypsy / Traveller Site demonstrates a significant inconsistency with national and regional planning policy and conflicts with sections of the LDP.

Health and Safety

The Welsh Government states clearly in their document Designing Gypsy and Traveller sites Good Practice Guide 2008 the following:

Section 3.1 (page 14) “It is essential to ensure that the location of a site will provide a safe environment for the residents. Sites should not be situated near...industrial processes or other hazardous places...to ensure health and safety of prospective residents is not at risk”.

Section 8.4 (page 44) “the presence of children on the site and potential health and safety risk for them and other residents should receive equal consideration for transit sites”.

Section 3.10 (page 15) “sites adjacent to light industrial areas therefore tend not to be popular...because of safety fears”.

The criteria is clearly set out and the proposed site at Celtic Way does not meet these criterion on many levels and I would fear for the protection of the children using the site;

- 24/7 access of HGV, commercial and employee vehicles to existing commercial premises.
- No pavements so pedestrian access is via a road with a 40 mph speed limit. This could be an issue for access to healthcare facilities, bus routes and local supermarket.
- The road and surrounding areas have poor street lighting and in some areas no streetlighting.
- The area is known locally as 'Celtic Lakes' with 13 areas of open water within 680m with a total surface water area of 38276m2. The nearest being only 22m away from the proposed site.
- There are also 3.6 miles of reens and drainage ditches within 0.5 miles.
- The LDP proposes developments of the business park and surrounding infrastructure upto 2026. Primarily the SDR extension and major redevelopment of M4 Junction 28 would make the immediate area a constant 'construction site' posing a further hazard to vulnerable people in portable accommodation as they travel within traffic management systems with additional heavy plant and live within a dust and noise polluted environment.

In addition to these points, the Gwent Police Report within the Gypsy and Traveller Site: Site Appraisal and Scrutiny Review appendix 4 (page 46) referencing the proposed site states “…this site would not be appropriate for children unless they are confined within the boundary of the site, due to the volume of traffic and heavy goods vehicles in this area...children playing outside the boundary would be can be dangerous and could be disruptive to the flow of traffic” which I feel would be a significant risk in such an area. Therefore based on the Gwent Police Report the proposed ‘soft landscape boundaries’ and without permanently closed gates it would be impossible to protect children within the Transit Site from inadvertently wandering into any number of the hazardous areas we have referenced above.

At the Duffryn Community Centre NCC presentation of the LDP by Mark Hand on 9th July 2013 the comment was made by Mr Hand along the lines of “the scrutiny committee drove via the site because I was driving the bus”. Well that sounds like a lovely day out for everyone on tax payers money. Did the Councillors step off the bus as they clearly did not consider all the above a danger. Did they notice the water, power station?

Environment

The Gwent Police Report within the Gypsy and Traveller Site: Site Appraisal and Scrutiny Review appendix 4 (page 46) raises concerns for “unauthorised expansion onto the unoccupied land to the east of the site. Unoccupied land to the south of the site and across Duffryn Lane could also be vulnerable to unauthorised use”. As the Travellers are unfamiliar with the area, they may not be aware that...
their immediate surroundings are an SSSI and floodplain. The prospect of unauthorised expansion could have a serious environmental impact on the SSSI and without clear management plans I am unable to comment on how the NCC expect to contain expansion and prevent pollution and a negative impact on the precious drainage water ways of Celtic Lakes and wider Severn Basin.

Conclusion

I believe the detailed objections above are valid reasons why the proposed site at Celtic Way does not comply with the Welsh Government Gypsy Traveller Good Practice Guide.

I strongly oppose a deadline of 5pm 26th July 2013 for public consultation on a proposal and supporting document, which lacks sufficient detail including management, security and health & safety assessments.

Please be informed that as a community, we are taking professional advice regarding our legal rights under the Localism Act 2011 and will respond in due course. We are also obtaining information supporting our objections under the Freedom of Information Act from multiple parties including the Newport County Council, the Welsh Government, the Gwent Police Authority and the South Wales Fire and Rescue Service. This information clearly will not be available prior to the deadline for the public consultation, but will be presented should further public consultations and hearings be held regarding to the proposed Gypsy / Traveller transit site at Celtic Way.

12/02/2014
Council Response

It is considered that the 6 week consultation process was sound. The proposals and consultation opportunities were advertised in the South Wales Argus, along with Newport Matters which is delivered to every home in Newport. All Community Councils were informed of the consultation, including Coedkernew. In addition, the consultation was advertised on the Council’s website and thousands of letters were sent out to stakeholders and members of the public. It is acknowledged that there was a fault with Newport City Council’s website during the weekend of 20/21 July. As a result, the Council took the reasonable step of extended the consultation for a further weekend.

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

The Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly. No detailed security plans are in place at this stage and the site is a strategic allocation. More detail will emerge during the design process of the planning application, which will be available for public consultation.

The proposal is for a transit site providing temporary short-term accommodation, rather than a permanent place to live. In this context, the adjacent land uses to the Celtic Way site are not considered to be hazardous, however it is agreed that they are not suitable places for children to play. The indicative layout of the transit site will include green areas for play and therefore children will have onsite facilities.

The site will be designed as a transit site and therefore only used by Gypsy/Travellers on a temporary basis as they pass through Newport. It is expected that the Gypsy/Travellers will use their vehicles to move around and there will be limited activity in terms of moving around the area on foot. Therefore the fact there is poor street lighting and a lack of pavement is not considered to be a significant concern. Increased street lighting could be provided if Members consider it to be essential.

With regard to Celtic Lakes, development alongside water can enhance the setting of an area. Safety around lakes is something that children from all cultures need to be aware of and is not considered an obstacle to development.

The Council has safeguarded an area of land for the new M4. Welsh Government has not raised the proximity of the site to the new M4 as an issue.

The nearby electricity substation is fenced in and secure.

The transit site will be clearly defined, maintained and managed. Any unauthorised expansion onto the SSSI is likely to be dealt with swiftly with Police action, who will be able to move on unauthorised encampments once the Council has a transit site.
Representation Details

by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M

Rep'n/Para/Policy    Representer    Agent    Accession No    Date Lodged    Late?    Source    Type    Mode    Status    Status Modified
3692.L2//H15.02    Lawrence, Tracey    22/07/2013    S    I    M

Document: Revised LDP, p.75
Policy: H15.02
Summary: Support use of Former Ringland Allotments as Gypsy and Traveller site instead of Celtic Way.

Item Question    Representation Text
11 11    Representation

Ringland Allotments

This site is also owned by NCC and therefore no negotiation of commercial transaction would be required. Within the Welsh Government Gypsy Traveller Good Practice Guide section 3.2 (page 44), it states that transit sites have been, “successful where transit sites are...provided adjacent to the main site”. This site is on the main identified transit route and there would be financial gains to be made in terms of reduced management costs, police surveillance, waste collection, and mains service provision as a result of both sites being situated in the same location.

Item Question    Council Responses
12 12    Speaking at Public Examination    Yes

Council Response

Noted. However, it should be noted that the Former Allotment site is approximately 1,600 metres from the proposed Hartridge Farm residential site.
### Representation Details

**Filtered to show:** (all of) Stage=L; Status=M  
**by:** (No grouping)  
**Rep'n/Para/Policy** | **Representor** | **Agent** | **Accession No** | **Date Lodged** | **Late?** | **Source** | **Type** | **Mode** | **Status** | **Status Modified**  
---|---|---|---|---|---|---|---|---|---|---
3692.L3//General | Lawrence, Tracey | | 22/07/2013 | | | | | | |  

**Document:** Revised LDP, p.75  
**Policy:** General G&T  
**Summary:** Propose new site, A449, for Gypsy and Traveller site.

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#### Item Question  
**Representation Text**

11  
**Representation**

Alternative Appropriate Sites

Those that attended the NCC LDP presentation were invited to propose alternative sites. Whilst I believe it is NCC to suggest alternative locations I would request NCC reconsider 2 such sites which have already had a sustainability appraisal and which better meet the criteria for Gypsy Traveller Transit sites;

A449

This site is owned by NCC (unlike Celtic way) and has existing drainage and sewage, has been identified within the Gypsy and Traveller Site; Site Appraisal and Scrutiny Review by Travellers as being an "excellent transit site" that is "close to main travelling route". They also highlighted that it was fine for short stays but not a location that would encourage people to stay beyond their allotted time. In addition "it is already fenced and gated" (noted in Stage 2 comments in the criteria table). This is a criterion for a Transit site and would prevent unauthorised expansion. This is in contrast to the comparative report for Celtic Way, which highlighted concerns by Gwent Police for "unauthorised expansion" onto the unoccupied land to the east and south of the proposed site. It is also noted that the A449 site location was "not highly visibly prominent" Report – Scrutiny Consultation 29/10/10 (page 5 section 14 iii) and this site would have minimal impact on local commercial and residential properties.

NCC presented issues regards to speed on the A449 however this could be resolved by introducing variable speed limits during the arrival of Travellers. This is currently successfully adopted for major event management. It would appear the A449 proposal was deleted from the LDP based on a Brief Desk Top Study noted in the "brief desk top assessment of the proposals, comments may alter on completion of a detailed site assessment and are therefore given without prejudice".

I have requested under the Freedom of Information Act ALL documentation related to the proposal at A449 such that I fully understand the rationale behind this deletion from the LDP. I still await this so cannot comment on NCC reasons for deletion. I would strongly advise NCC to review the criteria and reasons as to why the A449 was deleted from the LDP with a view of reinstating it as the preferred location.

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#### Item Question  
**Council Responses**

12  
**Speaking at Public Examination** | Yes  

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12/02/2014  
Page 882 of 1581
Council Response

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

The reasons why the A449 depot was ruled out are set out in the site appraisal information contained within the Cabinet Report dated 13 May 2013, which forms part of the LDP evidence basis and is published as part of the background paper on this topic. There were two main reasons for not continuing with this site:

1) A clear objection on highway safety grounds and confirmation from Welsh Government that they will not permit the use of the trunk road access.

2) The site is too small without tree clearance which would affect dormice and EU protected species.
**Representation Details**

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**Document:** Revised LDP, p.75

**Policy:** H15.01

**Summary:** Object to the G&T site at Celtic Way, Coedkernew.

<table>
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<tr>
<th>Item</th>
<th>Question</th>
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<tbody>
<tr>
<td>7 7</td>
<td>Delete an existing site</td>
<td>Yes</td>
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</table>

**Representation**

The plan is unrealistic in its expectations in placing a traveller transit area so close to residential homes and businesses and then; managing the increased risk of crime and anti social behaviour; the impact of loss of value to houses in the vicinity; residents were not pro actively informed of the plans.

I would like the proposed traveller accommodation site at Celtic Way Newport to be re-sited away from the area as it is unsuitable. This will impact negatively on house values, create antisocial behaviour and increase crime in the area. Additionally local businesses will be discouraged from investing in the area.

**Speaking at Public Examination**

I want to speak at a hearing session. To ensure that my views are represented clearly and the issues raised are communicated in person.

<table>
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<tr>
<th>Item</th>
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<th>Tick-box reply</th>
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<tbody>
<tr>
<td>2 2</td>
<td>Soundness of LDP</td>
<td>Yes</td>
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</table>

**Council Response**

The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

As with any other significant development, the Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.
**Representation Details**

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<th>Agent</th>
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**Document:** Revised LDP, p.75

**Policy:** H15.01

**Summary:** Objection to Gypsy and Traveller site at Celtic Way, Coedkernew

**Item Question**

11

**Representation Text**

would like to state my views on the traveller gypsy site adjacent to celtic horizon. The whole council need to look at this in seriousness of the site that could be put on the environment here in general. Pollution / dogs/ litter / fouling publicly / businesses. This is a nice area. And the council are prepared to allow burgling / violence / anti social behaviour towards good neighbours. I cant believe the council are entertainin of further more . Spoling ppls lives and hard working people at that.

**Item Question**

13

**Council Responses**

As with any other significant development, the Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.
### Representation Details

**Document:** Revised LDP, p.75  
**Policy:** H15.01  
**Summary:** Object to the G&T site at Celtic Way, Coedkernew.

#### Item Question  
**Representation Text**

I just want to make my opinion about the above subject matter know to you and ask that the government do not to carry out the LDP.  
I leave in the area and I am not in favour of the proposed site.  
First it will have an adverse effect on my property price when I want to sell.  
Secondly the crime rate will increase and future developments will not come to this area. If the project goes ahead businesses already established within the area will suffer a lot with regards to security. We all know the kind of Mayhem they can cause and do not want to experience that first hand. So I am not in favour of this proposed site for the Traveller community and suggest for it to be moved to another location.

#### Council Response

The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.

As with any other significant development, the Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.
Representations Details

by: (No grouping)

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Document: Revised LDP, p.75
Policy: H15.01

Summary: Object to the Gypsy and Traveller Site at Celtic Way, Coedkernew.

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<tr>
<td>7</td>
<td></td>
<td>Delete an existing site</td>
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</table>

11 Representation
I oppose a gypsy site so close to Celtic Horizon, and so close to the proposed housing development at Panasonic.

You can't sell housing close to a gypsy site.

This means the Panasonic site will be flawed.

There have already been too many thefts of gardens pots and plants on Celtic Horizon, which the police can do nothing about, and which neighbours readily put down to gypsies.

There must be nearly 1,000 homes on Celtic Horizon. I don't think it is politically wise to put these properties and their values at risk to an adjacent gypsy site.

Delete Celtic Way Marshfield: Wholly inappropriate site, in view of adjacent housing estate, and proposed housing estate at Panasonic. You can't sell housing near a Gypsy Site: Panasonic development would be flawed.

This is the outcome of the meetings so far:

If the proposed gypsy site were to go ahead then:

1. National Rail have said there will be NO rail station at Coedkernew
2. Quinns have said [at Board Level] that their future there will be at risk
3. There will be NO development of Panasonic site housing [as NO Developer will be able to sell property just down the road from a gypsy site]
4. There will be attempted mass emigration from Celtic Horizon
5. Halifax have said that every property on Celtic Horizon will depreciate by £30,000; there are nearly 1,000 homes on Celtic Horizon, which means that the COUNCIL WOULD BE SUED FOR £30,000,000 by Celtic Horizon property owners.

Conclusion
If you force your gypsy site to go ahead, YOU WILL DESTROY:

1. Public Transport
2. Local industry and employment.
3. Local residential development
4. Local housing
5. Council funding

Recommendation
I REQUIRE YOU to:

1. Withdraw this proposed site from your plan IMMEDIATELY

12/02/2014
### Item Question  Council Responses

13 13  Council Response

The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.

The Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.

It is not envisaged the proposed transit site will have any impact on the proposed railway station at Coedkernew.

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

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**Document:** Revised LDP, p.75  
**Policy:** H15.02  
**Summary:** Delete the Celtic Way G&T site and make the Former Ringland Allotment Site an allocation rather than contingency.

---

**Item Question  Representation Text**

11 11  Representation

2 Replace it in the plan with your alternative Council Allotments Site, also IMMEDIATELY

---

**Item Question  Council Responses**

13 13  Council Response

Noted. However, it should be noted that the Former Allotment site is approximately 1,600 metres from the proposed Hartridge Farm residential site.
I am writing to state my concern regarding the proposed Traveller/Gypsy site at land adjacent to Celtic Horizons in Coedkernew.

The land was originally part of the Industrial scheme which would have provided quality jobs to the area. This was the aim of the original planning consent. This hope was never fully realised but there is still a building with the potential for such use.

I am certain that if a Gypsy site was placed in the area this would prevent any future employment prospects as well as significantly affecting the lives of those who live and work in the area. I hope that our representatives in the Council will fight against this scheme in this totally unsuitable area.

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.
<table>
<thead>
<tr>
<th>Document: Revised LDP, p.75</th>
<th>Policy: General G&amp;T</th>
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<tbody>
<tr>
<td><strong>Summary:</strong> First preference is to reinstate the G&amp;T sites from the Deposit LDP (April 2012)</td>
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### Item Question
My first preference is for the original 5 gipsy and traveller sites allocated in the original draft LDP to remain as the allocated sites. If that first preference isn't accepted by the Council I wish to offer the following comments on the Revised LDP (see Rep: 3699.L2).

### Council Response
Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

<table>
<thead>
<tr>
<th>Document: Revised LDP, p.75</th>
<th>Policy: General G&amp;T</th>
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<tbody>
<tr>
<td><strong>Summary:</strong> Support the G&amp;T allocations as the least worst options.</td>
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### Item Question
I support the Revised LDP generally. In particular:-

1. I support Policies H15, H16 and H17 as the least worst options. The Langstone sites are too small, overlooked, unsuitable, liable to flooding, too close to existing residential development and are too far from amenities. In addition the Gipsy community do not support the Langstone sites and do not wish to be split up.
I support Policy SP5 and the allocation of the land north of the A48 (locally known as the Gorelands site and Oak Court) as countryside. All other brown field sites should be developed before any green field sites which should be protected from development.

Support noted.

I support the NCC Revised Deposit Plan.

Support noted.

Support noted.
Representation Details

Document: Revised LDP, p.75
Policy: H15.01
Summary: Object to the G&T site at Celtic Way, Coedkernew.

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**Item Question**  Representation Text

11 11  Representation
   To whom it may concern.
   
   I have received a letter regarding the positioning of the gypsy site. I live with my husband and 2 very young boys in celtic horizons. Where we are from we had gypsies living in the surrounding area, the bickering and fights in local Bars and supermarkets. I know they have to be situated some where however to be placed right by a large community of mainly children is questionable.

   Also on a main road in and out of Cardiff to Newport! As seen in Wentlodge just off St Brides their horses run riot across the roads and often they escape in a herd which we have had to avoid. The litter areas going Into wentlodge roundabout is heaped and items have been discar ded irresponsibly as they do not wish to spend petrol money going to the dump leaving it to pile up or someone else to pick it up which is paid by the council.

   Also, just their general attitude towards other people and their property is more often than not a problem. I understand that having such a close site will cause a decrease in our properties by around £30,000 in an already struggling recession. This affects the people that have worked hard and paid their way, some sort of tax should be inforced on them so that they appreciate other people’s hard work rather than working and keeping all their earnings whilst living for free, this as you can imagine is a downer and causes despondency as we would all like to live like this if we could.

   To summarise, your helping non paying contributing individuals who are wealthy due to this, whilst decreasing our lively hoods with the decrease in house prices and with the increase of danger to our children and drivers. I therefore wish that they are placed in a more isolated area and am against the plans to place them near us.

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**Item Question**  Council Responses

13 13  Council Response
   
   As with any other significant development, the Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.

   The Council has a duty to provide accommodation for the Gypsy/Traveller population. We do not have a duty to provide land for horses. The site will be owned by the Council and there is no intention to allow the occupants to keep horses on site. Site rent will be payable by occupiers to cover utility bills and waste collection etc.

   The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.
Donald, Miss Elanor  

Document: Revised LDP, p.75  
Policy: H15.01  
Summary: Object to the G&T site at Celtic Way, Coedkernew.

I am writing to state my reasons against the placement of a transit traveller and gypsy site at Celtic Way. I am firmly against the placement of this site here because of the additional generation of noise and environmental pollution created by these sites and the general disregard the more transient travellers have for the local amenities and the land/properties near by to them. Businesses in this area have a difficult enough time without the additional concerns of theft, vandalism, rubbish creation and antisocial behaviours of these people and their animals including both their dogs and their free roaming livestock. We in Celtic Horizons have already experienced their free roaming horses on several occasions, when they have sited themselves illegally in the area such as in the front part of tredegar house and this has caused property damage on occasion and people in the area have been the victim of abuse by the travellers attempting to regroup there errant stock. What does the council intend to do with regards to maintaining the beauty of the areas fields, reens and parks when they arrive with piles of rubbish they dump/accumulate? The area is conveniently just outside the area of archeological interest I note as well! The area will not remain a green wedge/green belt for long with such an encampment placed there nor will the Employment Zone highlighted in blue surrounding the camp gain much business or attract many potential owners of the encampment is placed within its area. Insurance rates will soar for residents and business owners alike as well as dealing with the emotional and financial hardship caused by thefts and vandalism which will increase due to their presence. What does the council and local police force intend to do in the area to safeguard the local population from theft/vandalism and antisocial behaviour? Will there be increased policing presences? What about local home owners right for quiet and enjoyment in their homes and local community? In addition, the home and business owners in the area will also see a sharp fall in house prices, there is already a precedence for this set by other areas which have experienced as much as a £31000 drop in the value of their homes after the situation of such encampment in the vicinity of their property. Does the local council intend to compensate local home owners and upon siting of said camp intend conducting a full review of house prices and council tax bandings and reducing the council taxes revenue generated in the area which currently would be reasonably high given the socioeconomic group in the majority of the adjoining estate? This would I think damage the Council's revenue which they would actually need to maintain the camp and clear up after its inhabitants and also revenue which our local police force would also need to deal with the "increased activities" of the transient population. Not to mention the damage to the local wildlife, which inhabit the extensive Reen system in the locale.

12/02/2014
Council Response

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments. The site does not lie within a green wedge or greenbelt.

As with any other significant development, the Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.

The Council has a duty to provide accommodation for the Gypsy/Traveller population. We do not have a duty to provide land for horses. The site will be owned by the Council and there is no intention to allow the occupants to keep horses on site.

The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research has shown that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.

The transit site will be clearly defined, maintained and managed. Any unauthorised expansion onto the SSSI is likely to be dealt with swiftly with Police action, who will be able to move on unauthorised encampments once the Council has a transit site.
3703.L1//H15.01 Southgate, Mr Andrew 

Document: Revised LDP, p. 75

Policy: H15.01

Summary: Object to G&T site at Celtic Way, Coedkernew and suggest a site nearer Peterstone Lakes Golf Club.

Item Question  Representation Text

5 6 Add a new site Yes

7 7 Delete an existing site Yes

11 11 Representation

I wish to object to the proposed location of the "preferred Transit Site for Travellers" at Celtic Way, Coedkernew.

I own property at Skenfrith Mews, Celtic Horizons which may be devalued due to the proximity of the "preferred Transit Site for Travelers".

I object to the "Travelers" having the perceived right to approve of its location ahead of the final consultation process. If this is a short term transit site, then it does not need to be close to local businesses or local private residential properties. I would propose placing the Transit Site for Travelers site nearer to Peterstone Lakes Golf Club if one has to be provided at all.

I object to the reported cost to the Newport Tax Payers of circa £6.3m.

Item Question  Council Responses

13 13 Council Response

The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

The Council is aware of the financial implications to its budget.
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<tr>
<td><strong>Policy:</strong> General G&amp;T</td>
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<tr>
<td><strong>Summary:</strong> Support the revisions made in respect of Gypsy and Travellers sites.</td>
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**Representation Text**

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We have previously written with our concerns about the locations of the G & T traveller sites in Newport. We wish to write and inform you that we are pleased that common sense has prevailed and the LDP has been revised. We therefore agree and support the reformed LDP plan for Newport. Whilst we have previously objected to the unsuitability of the sites initially selected we have always supported Newport CC in its need to provide adequate provision for the travelling community.
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**Council Response**

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Support noted.
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12/02/2014
**Newport City Council Local Development Plan**

**Representative Details**

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<td>28/06/2013</td>
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<td>O</td>
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**Summary:** Object to gypsy and traveller site at Celtic Spring, Coedkernew.

**Document:** Revised LDP, p.75

**Policy:** H15.01

**Item Question** | **Representation Text**
---|---
7 7 | Delete an existing site  
10 | Soundness Test  
11 | P1, P2, C1, CE2, CE3, CE4.

**Representation**

P1 - To start the Council have not involved the local community. We as home owners near to this proposed site had not been informed, there were no announcements in papers, no letters through the front door, no communication whatsoever, it was only by 'hear' say that we heard. Fortunately a local resident posted some communication through our door to inform us of this Plan. So P1 fails the test of soundness.

P2 - A Gypsy site at Celtic Way would result in additional noise pollution of generators, vehicle movement, barking dogs and littering including anti social behaviour. P2 fails the test of soundness.

C1 - The proposed site at Celtic Way has not taken into consideration the plans for expansion for local business behind the LG factory, including Quinn radiators, WHSmith and STS - not forgetting the valued business community in Cleppa Park, Celtic Springs and NOW the potential site on the old Panasonic ground for new residential housing. I understand Quinn radiators and STS including other local business have objected to this proposed site and will definitely deter investment, a risk of unemployment as businesses pull out (if this plan goes ahead). Cleppa Park and land around the LG factory are fantastic opportunities for businesses to invest (look at Celtic Springs and how that is evolving) - having a Gypsy site here will definitely deter businessess from coming to the area. C1 fails the tests for soundness.

CE2 - The policy is not realistic, it has failed from the onset as the local community were not informed. I believe this plan would most likely have gone ahead from under our communities noses had we not heard from a local resident. As a community we plan to combine our efforts to object to a Gypsy site at Celtic Way. CE2 - failed test of soundness.

CE3 - You may have a clear implementation plan but I see no clear monitoring solution, in particular monitoring anti social behaviour, monitoring the travellers from entering the Celtic Horizons estate, monitoring noise pollution, monitoring litter pollution, monitoring theft. CE3 - failed test of soundness.

CE4 - It is not flexible to changing circumstances. If the site is agreed business and local residents will move. There is a hard working community in the adjoining estate 'Celtic Horizon', house prices will decline rapidly and people will move from the community - devalued house prices will bring in a different class of community and effectively drive the rest to the community away. The local children already find it difficult enough to get places in the local schools but now this will become even more difficult. Again, members of the community will leave. CE4 - failed test of soundness.

**Further Action**

12 | Speaking at Public Examination

**Council Responses**

<table>
<thead>
<tr>
<th>Item Question</th>
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<tbody>
<tr>
<td>Soundness of LDP</td>
<td>No</td>
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### Council Response

It is considered that the 6 week consultation process was sound. The proposals and consultation opportunities were advertised in the South Wales Argus, along with Newport Matters which is delivered to every home in Newport. All Community Councils were informed of the consultation, including Coedkernew. In addition, the consultation was advertised on the Council’s website and thousands of letters were sent out to stakeholders and members of the public. It is acknowledged that there was a fault with Newport City Council’s website during the weekend of 20/21 July. As a result, the Council took the reasonable step of extended the consultation for a further weekend.

The site will be designed as a transit site and therefore only used by Gypsy/Travellers on a temporary basis as they pass through Newport. It is expected that the Gypsy/Travellers will use their vehicles to move around and there will be limited activity in terms of moving around the area on foot.

As with any other significant development, the Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.

The site will be monitored by the Council and any antisocial behaviour, crime, litter problems will be investigated and dealt with swiftly.

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.
### Representation Details

<table>
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<tr>
<th>Rep'n/Para/Policy</th>
<th>Representor</th>
<th>Agent</th>
<th>Accession No</th>
<th>Date Lodged</th>
<th>Late?</th>
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<td>3706.L1//H15.01</td>
<td>Thomas, Mr Andrew</td>
<td></td>
<td>28/06/2013</td>
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**Document:** Revised LDP, p.75  
**Policy:** H15.01  
**Summary:** Object to gypsy and traveller site at Celtic Way, Coedkernew.

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<tr>
<th>Item Question</th>
<th>Representation Text</th>
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<tr>
<td>7 7</td>
<td>Delete an existing site</td>
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**Representation**

I have recently received a letter explaining the council's plan to use the land at Celtic Springs as Traveller site.

Upon digesting the information and taking some time to think about it, I am absolutely mortified and angry. Had I known this was going to happen, I would never have moved to the area. I moved here to start and raise a family around good peaceful honest respectful people in a good area with good neighbours and until now that has been the case. If this proposal goes through, this will no longer be the case.

I have worked next to traveller sites for over 15 years and the problems that arise from this are never ending, from breaking into factories, stealing fuel from vehicles and aggravation to staff.

Our house prices will depreciate, businesses will not locate here, our neighbourhood will deteriorate and most importantly, our children will not be safe to play in the streets. I feel extremely strong about this and hope that my views which are shared by all my neighbours are listened to and acted upon.

**Council Responses**

As with any other significant development, the Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however, an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council's duty and enabling the Police to use its powers to move on other unauthorised encampments.

The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.
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**Document:** Revised LDP, p.6  
**Policy:** Intro & Overview  
**Summary:** Support the Plan.

### Item Question  Representation Text

**Representation**

Mr and Mrs R Powell wish to agree with the plan as set out.

### Item Question  Council Responses

**Council Response**

Support noted.
**Representation Details**

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<td>01/07/2013</td>
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**Document:** Revised LDP, p.75

**Policy:** H15.01

**Summary:** Object to the gypsy and traveller site at Celtic Way, Coedkernew.

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**Item Question** | **Representation Text**
---|---
7 | Delete an existing site

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**Council Response**

The Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.

The Council has a duty to provide accommodation for the Gypsy/Traveller population. We do not have a duty to provide land for horses. The site will be owned by the Council and there is no intention to allow the occupants to keep horses on site.
Document: Revised LDP, p.75
Policy: H15.01
Summary: Object to Gypsy and Traveller Site at Celtic Way, Coedkernew.

As a resident of Coedkernew I am greatly concerned by this development plan. I wish to make my objection to this plan known.

Last year when they were last here and encamped on Tredegar House site, I caught a young boy trying to steal my son’s bike. We were in the playground by the caravan site. Furthermore I am concerned there will be:

1. an increase in anti social behaviour
2. less chances of future business development into the area.
3. a reduction in house prices.

As with any other significant development, the Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.
The Celtic Way site is not suitable for a number of reasons and should be removed completely as a proposed transit traveller site:

- It is much more practical to keep all the traveller community together; therefore, the site at the former Ringland Allotments should be the first choice for the transit site, not a contingency. The decision to base the site at Celtic Way is flawed as it is surrounded by business and is in a commercial setting which would offer no privacy. It would also drive away local businesses from these surrounding sites which currently bring in a considerable amount of revenue for Newport City and its Council due to the increased risk of burglary, break-ins, and car thefts. There is a large privately owned housing site directly next to the proposed site and this traveller site will have an extremely detrimental effect on house prices. Will Newport Council be compensating the residents who will lose the right to enjoy their homes peacefully under the Human Rights Act? It is the public authority's duty to take action to allow residents to enjoy their home life, not to create a situation where you are actually taking this right away!
- There are a number of elderly residents who live there who will be frightened to leave their homes when there is such an increased risk of violence, muggings, and anti-social behaviour. The land is a environmental greenfield site and as such putting a traveller site there will have a massive negative impact on the local wildlife which is in abundance in this area.

Council Response

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however, an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

As with any other significant development, the Police will continue to be consulted as part of the detailed design process, and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.

The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research has shown that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.

The transit site will be clearly defined, maintained and managed. Any unauthorised expansion onto the SSSI is likely to be dealt with swiftly with Police action, who will be able to move on unauthorised encampments once the Council has a transit site.
Document: Revised LDP, p. 75
Policy: H15.02
Summary: Celtic Way G&T site should be removed and replaced with the contingency site at the Former Ringland Allotment

---

Item Question  Representation Text

11 11  Representation

The Celtic Way site is not suitable for a number of reasons and should be removed completely as a proposed transit traveller site:

It is much more practical to keep all the traveller community together therefore the site at the former Ringland Allotments should be 1st choice for the transit site not a contingency.

---

Item Question  Council Responses

13 13  Council Response

Noted. However, it should be noted that the Former Allotment site is approximately 1,600 metres from the proposed Hartridge Farm residential site.
I have been made aware of the above subject today via a leaflet received by post. In response to the leaflet here are my objections:

1) As commented it will lower the value of our houses.
2) Home content insurance/car insurance, etc will become higher.
3) There is another traveller site closer to Cardiff and around that area the amount of rubbish and litter is disgusting. Having driven passed the site it is not just bin bags but old beds, fridge freezers, sofas etc.
4) Not feeling as safe in my own area any more.
5) Road safety for the general public.
6) After watching the television documentaries about gypsy/traveller’s their social behaviour is disgraceful. Also if there is a problem their total lack of respect of police means nothing will get resolved.
7) It is unbelievable that council tax payers are going to have to pay for this site. We are paying so they don't have to pay anything for living somewhere, which apparently is why they 'travel' or 'move around'.

The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.

As with any other significant development, the Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.

The site will be designed as a transit site and therefore only used by Gypsy/Travellers on a temporary basis as they pass through Newport. It is expected that the Gypsy/Travellers will use their vehicles to move around and there will be limited activity in terms of moving around the area on foot. Highways have not raised traffic movements as a concern.
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<tr>
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<td>I totally agree with the proposal contained within 5.32, 5.33 and 5.34.</td>
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**Item Question Council Responses**

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Document: Revised LDP, p.76
Policy: H16
Summary: Support Policy H16

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Accession No: 02/07/2013  S  E  M
02/07/2013  E  S  M
Document: Revised LDP, p.76
Policy: H16
Summary: Support Policy H16

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</table>
Woodfield, Mr Simon

Summary: Object to the G&T site at Celtic Way, Coedkernew.

11  Representation

I'm writing to you to raise a formal objection to the proposed traveller site in Celtic Way.

I'm unable to see a single positive aspect that this site will bring to the area, and spending £6.3M of your already stretched budget on it is frankly absurd.

The Duffryn/Coedkernew area - after years of problems and neglect - is finally on the up. New housing, business and good honest hard working young families are moving in - and with one terrible decision all that progress will be undone.

13  Council Response

The Council is aware of the financial implications to its budget. A need has been identified for a gypsy/travellers transit site and therefore the Council has a duty to provide it.
The Council have made the decision to allocate the Land at Celtic Way, Coedkernew as the preferred transit site for travellers after approval from Travellers. The travellers site could potentially affect this residential and business area in the following ways:- The introduction of the transit site will result in additional noise pollution of generators, dogs and vehicle movement. Deter new business investment and therefore employment to Imperial Park. Reduction in house prices. Halifax says anti-social neighbours can shave up to £31,000 off the price of the average property. Change in local environment potential increase of anti-social behaviour and the ‘right for quiet enjoyment’ in our homes and community.

12/02/2014
I wish to submit an objection to the proposal to allocate land at Celtic Way, Coedkernew as the preferred transit site for travellers, on the grounds of noise pollution and possible antisocial behaviour. I also wish to object to an estimated cost to Newport taxpayers in the region of £6.3 million related to the proposed Coedkernew site and the one at Hartridge.

The Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly. Noise issues are not considered to be insurmountable.

The Council must provide sites to meet the need identified for families within its area that require accommodation. The Council is aware of the financial implications to its budget.
To whom it may concern,

As a family and an individual who lives locally to this site I have severe concerns regarding the proposals for the area indicated under the proposed new LDP (H15) being designated as a dedicated travellers site.

Having personally had issues and also viewed numerous shocking incidents on a daily basis travelling to work with the individuals located on the current local travellers site currently situated on the lighthouse road towards Cardiff.

I fear the proposed additional new site located in such close proximity to many business's and developing local communities, will bring these daily disturbances, anti social behaviour, waste tipping and theft to name a few witnessed occurrences, to close.

Forcing local business to either move, close, or not come to the area to establish business in the first place.

This site will also have a damaging effect on the local area by deterring first time buyers or people looking to move to the area to establish homes, not to mention the de-valuing of existing housing stock in close proximity to the site.

I highly urge the council to reconsider these proposals for the sake of this developing area.

As with any other significant development, the Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.
Representation Details

by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M
Rep'n/Para/Policy Representor
Accession No Date Lodged Late? Source Type Mode Status Status Modified
3721.L1/H15.01 George, Mr Jais 04/07/2013 O M

Document: Revised LDP, p.75
Policy: H15.01
Summary: Object to the G&T site at Celtic Way, Coedkernew.

Item Question Representation Text
4 4 A new paragraph or new text Yes
5 5 Add a new site Yes
11 11 Representation

We do not like the idea of a Gypsy site at huge cost to the councils. It is our - council tax payers money, and you wish to use that money to build a site for people who freely indulge in anti social activities. We also do not like the location of the proposed site, near to a business park, residential area of many houses, causing trouble to businesses and residents alike.

12 12 Speaking at Public Examination No

Item Question Council Responses
2 2 Soundness of LDP Tick-box reply

13 13 Council Response

The Council is aware of the potential financial implications of going ahead with the site.

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

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<td>11</td>
<td>Representation</td>
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<td></td>
<td>Coedkernew has patchy access to Police due to its proximity to Cardiff leaving all residents currently under serviced making the addition of transitional accommodation difficult to manage. The main roads are at present very busy and poorly serviced and the additional traffic from traveller transit will cause further traffic problems and damage to roads. The area is a flood risk and traveller vehicles would be at high risk in this area. Access to waste disposal is many miles away and there are currently no residential collections at Celtic Way because this is an industrial area making it unsuitable for residential habitation. The Plan should be changed but selected a more suitable site closer to important amenities such as Police protection.</td>
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<td></td>
<td>Waste disposal facilities would be provided on site. The potential increase in traffic has not been raised as an issue by colleagues in Highways.</td>
<td>No</td>
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Council Response

Waste disposal facilities would be provided on site. The potential increase in traffic has not been raised as an issue by colleagues in Highways.

The Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.
Document: Revised LDP, p.75
Policy: H15.01
Summary: Object to the G&T site at Celtic Way, Coedkernew.

It will be catastrophic to everyone in the surrounding area if this gypsy site goes ahead. In all my years I have never come across such a corrupt, hypocritical and violent community. Women are treated like slaves, cruelty to animals is acceptable and they believe ‘fighting solves everything’. I speak from experience and every experience I’ve had with travellers has been very bad. I’ve been threatened with violence because I walked past a caravan which was illegally parked in Tredgar House public car park. I’ve witnessed about 8-10 traveller children set upon an elderly couple in their late 60’s because they’d seen them as vulnerable. My friend caught them trying to steal his dog from out his back garden and were lifting it over the fence. I could go on and on but I will probably get called racist and I’m stereotyping, well I’m not, far from it, this is ow it really is so c’mon wake up people and close this thing down before it totally destroys our lovely community.

Item Question  Council Response

Comments noted.

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.
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<td>8 8</td>
<td>Candidate Site Name</td>
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<td>Traveller transit site</td>
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<td>My family do not want the traveller site by our property, already my house has been burgled, my vehicle has been broken into twice, my work tools stolen. The travellers who park locally, leave the area (Tredgar house) in a mess, enter our property and have taken old scrap kitchen equipment without permission, intimidating the women and children. The only help from the police has been a crime number and a letter from the chief constable apologising for the unsolved crime! The council would be better off spending the money improving the local services, for the council tax payers and not passers through, who do nothing but diminish the local economy.</td>
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The Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.
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<td><strong>Document:</strong> Revised LDP, p.75</td>
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<td><strong>Policy:</strong> H15.01</td>
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<td><strong>Summary:</strong> Object to proposed Transit site at Celtic Way</td>
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**Item Question**       **Representation Text**
11 11 Representation
The full consultation comments are available to view against representation reference 3725.L1

**Item Question**       **Council Responses**
13 13 Council Response
Please see the full response to rep 3725.L1
Representation Details

Document: Revised LDP, p.76
Policy: H16.02
Summary: Proposed former Ringland Allotments as an alternative Transit site to that proposed at Celtic Way.

Item Question  Council Responses

13  13  Council Response

Ringland allotments have been identified as a contingency site for transit accommodation.

The following points address concerns regarding the proposed transit site at Celtic Way:

As with any other significant development, the Council has liaised with the police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the police if any incidents of crime that relate to the site are reported.

Environment – The transit site will be clearly defined, maintained and managed. Any unauthorised expansion onto the SSSI is likely to be dealt with swiftly with Police action, who will be able to move on unauthorised encampments once the Council has a transit site.

Alternative Sites – Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
### Representation Details

**Newport City Council Local Development Plan**

**Rep'n/Para/Policy** | **Representor** | **Agent** | **Accession No** | **Date Lodged** | **Late?** | **Source** | **Type** | **Mode** | **Status** | **Status Modified**
--- | --- | --- | --- | --- | --- | --- | --- | --- | --- | ---
3725.L4//General | Moulton, Mr Kevin | | | 24/07/2013 | | | | | | |

**Document:** Revised LDP, p.75  
**Policy:** General G&T  
**Summary:** Proposed two alternative transit Gypsy and Traveller sites at A449 and Tredegar Park Caravan Club.

**Item Question** | **Representation Text**
--- | ---
11 11 | Representation  
The full consultation comments are available to view against representation reference 3820.L3.

**Item Question** | **Council Responses**
--- | ---
13 13 | Council Response  
Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

---

### Representation Details

**Newport City Council Local Development Plan**

**Rep'n/Para/Policy** | **Representor** | **Agent** | **Accession No** | **Date Lodged** | **Late?** | **Source** | **Type** | **Mode** | **Status** | **Status Modified**
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3726.L1//General | Fisher, Sue | | | 08/07/2013 | | | | | | |

**Document:** Revised LDP, p.75  
**Policy:** General G&T  
**Summary:** Support the Revised LDP in particular reference to the location of Gypsy and Traveller sites.

**Item Question** | **Representation Text**
--- | ---
11 11 | Representation  
Having been made aware of the revisions to the above plan and in particular reference to the location of the Gypsy and Traveller sites as set out in the plan, I accept and approve of the Revised Deposit Local Development Plan.

**Item Question** | **Council Responses**
--- | ---
13 13 | Council Response  
Support noted.
## Representation Details

**Document:** Revised LDP, p.22  
**Policy:** SP08  
**Summary:** Propose to designate land in Langstone as Special Landscape Area

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<th>Item Question</th>
<th>Council Responses</th>
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<tbody>
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<td>11</td>
<td>Representation</td>
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<td>Having been made aware of the revisions to the plan and in particular reference to the location of the Gypsy and Traveller sites as set out in the plan, I accept and approve of the Revised Deposit Local Development Plan. However, further improvements could be made to the Plan in protecting Langstone Village from further major development by adding the Countryside north of the A48 that is outside the boundary settlement, up to and including Old Roman Road, and designate it as 'Special Landscape Area'. I look forward to hearing your views on this improvement idea.</td>
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<td>13</td>
<td>Council Response</td>
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<td></td>
<td>The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales' guidance. Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.</td>
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</table>
### Representation Details

**Document:** Revised LDP, p.76  
**Policy:** H16.02  
**Summary:** Ringland allotments are still allotments and no planning given to use for anything else.

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<th>Item Question</th>
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<td>Ringland allotments are still allotments and no planning given to use for anything else.</td>
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<th>Council Responses</th>
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</table>
| 13            | Location - The site is adjacent to the settlement boundary and considered to be a reasonably sustainable location. More remote locations that are further outside of the settlement boundary have poorer access to amenities and place more of an emphasis on car travel, therefore deemed to be more unsustainable.  

Existing Use – There are no allotments on the site. Alternative allotment provision can be investigated if it is demonstrated there is insufficient allotment provision across Newport as a whole. |
Hartridge Farm Site - Propose Welsh speaking school instead of this Gypsy site, why can it not go onto the disused Whitehead site, as it has all the facilities for water, waste, drainage etc could save the COUNCIL Thousands. This site is dangerous for all kids local and gypsies. Local children will revolt to these people and will not go to school and will affect their upbringing. Please lets use this site to benefit the local community, it is deprived enough due to the local of businesses wanting to come to Newport. Crime will increase costing tax payers more, Council should look at other counties in the country such as Berkshire, the crime rate is massive coming from the Langley Gypsy site in Slough for example. Every gypsy in the country will descent on Newport.

Council Response
The Council has a duty under the Housing Act 2004 to identify the need within its area for gypsy and traveller site, and to then take steps to address the need. An extensive site selection process, considering 240 sites has been undertaken, prior to sites being allocated in the LDP. Alternative gypsy and traveller sites and alternatives on the allocated gypsy and traveller has been assessed by the Council and the findings can be read in the Alternative Sites Assessment Report. As with any other significant development, the Council has liaised with the Police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the police if any incidents of crime that relate to the site are reported.

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
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<tr>
<td>3728.L1//General</td>
<td>Forbes-Warren, Mr Nicholas</td>
<td>09/07/2013</td>
<td>P</td>
<td>S</td>
<td>M</td>
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Document: Revised LDP, p.75
Policy: General G&T
Summary: Support revision to the plan including the location of G and T sites.

**Item Question**  
**Representation Text**

11  Representation

Having been made aware of the revisions to the above plan and in particular reference to the location of the Gypsy and Traveller sites as set out in the plan, is acceptable, and I accept and the approve the Revised Deposit Local Development Plan.

**Item Question**  
**Council Responses**

13  Council Response

Support noted.
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<tr>
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<td>Amend the boundaries of an existing site</td>
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<td>11 11</td>
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<td>However, further improvements could be made to the Plan in protecting Langstone Village from further major development by adding the Countryside north of the A48 that is outside of the boundary settlement, up to and including Old Roman Road, and designate it as a 'Special Landscaped Area'.</td>
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<td></td>
<td>Having recently been made aware of the revisions to the above plan and in particular reference to the location of the Gypsy and Traveller sites as set out in the plan, we find this acceptable, and I accept and approve the Revised Deposit Local Development Plan.</td>
</tr>
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</table>

Note: The document discusses the revised local development plan with a focus on support for Gypsy and Traveller sites. The representation is made by Mr & Mrs JW Summerhill, and the council response notes the support."
However, further improvements could be made to the Plan in protecting Langstone Village from further major development by adding the Countryside north of the A48 that is outside of the boundary settlement, up to and including Old Roman Road, and designate it as a 'Special Landscaped Area'.

The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales' guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.
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<tr>
<td>3729.L3//SP03</td>
<td>Summerhill, Mr &amp; Mrs JW</td>
<td>09/07/2013</td>
<td>P</td>
<td>C</td>
<td>M</td>
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Document: Revised LDP, p.19
Policy: SP03
Summary: Queried whether storm water flooding has been considered in the LDP.

**Item Question** Representation Text
Has sufficient thought been given to and a required action plan been included to take account of storm water flooding?

**Council Response**
A Strategic Flood Consequence Assessment (SFCA) has been undertaken on the proposals in the Plan. This looks at a range of flooding scenarios including tidal and fluvial as well as surface water run-off, which take into account storm events. More detailed assessments will also be required as part of planning applications submissions. With regards to an action plan, as Lead Local Flood Authority (LLFA), Newport City Council (NCC) has the responsibility to develop, maintain, apply and monitor a strategy for local flood risk management (Local Strategy) which is currently being developed. This high level strategy aims to provide a framework for the development of specific measures, and decision making, associated with managing local flood risk and coastal erosion in Newport.

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<tr>
<td>3730.L1//General</td>
<td>White, VC &amp; VJ</td>
<td>10/07/2013</td>
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Document: Revised LDP, p.75
Policy: General G&T
Summary: Supports the G&T allocations made in the Revised Deposit Plan.

**Item Question** Representation Text
Having been made aware of the revisions to the above plan and in particular reference to the location of the Gypsy and Traveller sites as set out in the plan, is acceptable and I accept and approve the revised Deposit Local Development Plan.

**Council Response**
Support noted.
Having been made aware of the revisions to the plan and in particular reference to the location of the Gypsy and Traveller sites as set out in the plan, is acceptable and I accept and approve the revised Deposit Local Development Plan. However, additional improvement could be made to the plan in protecting Langstone village from further major development by adding the countryside North of the A48 that is outside of the boundary settlement, up to and including Old Roman Road and even up to and including the Kemys Ridge and designate it as a "Special Landscape Area.

The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales’ guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.
Document: Revised LDP, p. 75
Policy: H15.01
Summary: Object to the G&T site at Celtic Way, Coedkernew.

Item Question | Representation Text
--- | ---
7 | Delete an existing site
10 | Soundness Test
11 | Representation
   I object to the allocation of the land at Celtic Way, Coedkernew being used for Traveller transit accommodation. My objection is based upon the fact that future investment in to Imperial Park will be deterred and this will impact on the community, at large. I believe the contingency site at the former Ringland Allotment offers a better solution as Imperial Park (Celtic Way) has much more to offer in terms of future growth and prosperity for Newport.

12 | Speaking at Public Examination

Item Question | Tick-box reply
--- | ---
2 | Soundness of LDP

13 | Council Response
   It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.
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<th>Rep'n/Para/Policy</th>
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<tr>
<td>3731.L2//H15.02</td>
<td>James, Mr Christopher</td>
<td>09/07/2013</td>
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<td>Summary: Delete the Celtic Way G&amp;T site with the contingency site at the Former Ringland Allotment site.</td>
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<td>I believe the contingency site at the former Ringland Allotment offers a better solution as Imperial Park (Celtic Way) has much more to offer in terms of future growth and prosperity for Newport.</td>
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<td>3732.L1//General</td>
<td>Price, Mr &amp; Mrs J</td>
<td>10/07/2013</td>
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<td>S</td>
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<td>Summary: Support for the Plan's Gypsy and Traveller allocations.</td>
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The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales’ guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.

In reference to the revised Local Development Plan I accept and approve the revised plan. I believe that the Hartridge site in particular is very suitable for the purpose.
Representation Details

by: (No grouping)

Filtered to show: (all of) Stage=L; Status=M

Rep’n/Para/Policy Representation Details Agent Accession No Date Lodged Late? Source Type Mode Status Status Modified
3734.L1/H15.01 Bird, Mr Justin 24/07/2013 E O M

Additional material submitted

Document: Revised LDP, p.75
Policy: H15.01
Summary: Objection to proposed Gypsy and Traveller site at Celtic Way

You are probably aware that I have had an active involvement in the residential objection to the proposed travellers site at Celtic Way, Coedkernew. Therefore, a number of the key concerns and objections will be reiterated by many fellow residents who are concerned and dismayed at the proposal to locate a travellers site within Coedkernew. I have been in close contact with a number of businesses and I am therefore privy to a number of the objection letters that you have received from them and I am also aware of the opinions of other businesses that are in close proximity to the proposed site and have yet to contact you.

My personal objection to this proposal is a simple one. Duffryn was at one point a struggling community and considered a run-down area, but six years ago when I decided to purchase the house that I now live in, I recognised a significant difference in the area. An area that has had substantial investment, both in residential terms and in business terms. It is an area of Newport that has had a recognisable growth in industry despite the loss of LG and it houses blue chip companies across many industries (Finance, Technology & Manufacturing to name a few), companies that are leading their industries and have business interests across Europe.

Location-wise, it is extremely well placed, being on the M4 corridor and has alternative access to and from Cardiff. The one missing ingredient is a train station, which the NCC looks set to resolve as part of the proposed LDP, it is the final piece to the jigsaw. This is a highly desirable area for industry (even more so with a railway station) and NCC should recognise and be proud of the success they have made of this area.

It therefore seems incredible to me, that this success story is to be jeopardised by the very same people that have made such a success of this area!

As part of my role in collating information for the objection, I have tried to consider your side of this, why you might have decided on this area. On the face of it, it makes sense as far as the criteria used for the feasibility assessment goes. This area does tick all the (very few) boxes and therefore, I can see why this location was placed in the top 5. However, this feasibility assessment does not consider the wider impact of putting such a site in this location, of the relative impact it would have on the actual location that is being proposed, of the impact it may have to industry, of future investment and growth in the area and the impact it could have on other sections of the LDP.

It is clear from some of the objections that you have received (I refer you to the two objections made by Fletcher Morgan and NBA Associates, attached) that whilst we are required to be impartial and non-discriminatory as part of our own objections, unfortunately people WILL make those sort of judgements when looking for suitable and desirable locations for investing their businesses. Equally, people WILL make those sort of judgements when looking for suitable and desirable places to live. And whilst I have yet to get official confirmation of this, I do not believe Network Rail would continue their investment either. It is a recipe for disaster.

I conclude, I have tried and tried to understand your decision and whilst I accept that based on the limited criteria of the feasibility analysis, this site ticks those boxes, the feasibility analysis does miss some key factors that should not be ignored, not least common sense. Newport Council are working hard to develop the reputation of this city and Celtic Springs, Coedkernew and Duffryn are fundamental to that reputation because of the growth and success that you have brought to this area. I believe that to back this site as the proposed site would be suicidal both professionally and politically for all those involved.

I feel it is so obvious from the reasons that I have given as well as those that have been provided freely by the businesses that surround this site that you are making a massive, short-sited and a potentially damaging & expensive mistake and I implore you to reconsider this site on these grounds.
Celtic Way Representations

Business – It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council's duty and enabling the Police to use its powers to move on other unauthorised encampments.

Location and Design – The proposal is for a transit site providing temporary short-term accommodation, rather than a permanent place to live. In this context, the adjacent land uses to the Celtic Way site are not considered to be hazardous, however it is agreed that they are not suitable places for children to play. The indicative layout of the transit site will include green areas for play and therefore children will have onsite facilities.

24/7 access of HGV/movement of employees – The site will be designed as a transit site and therefore only used by Gypsy/Travellers on a temporary basis as they pass through Newport. It is expected that the Gypsy/Travellers will use their vehicles to move around and there will be limited activity in terms of moving around the area on foot. Therefore the fact there is poor street lighting and a lack of pavement is not considered to be a significant concern. Increased street lighting could be provided if Members consider it to be essential.

Cardiff to Newport dual carriageway is within 0.5 miles – The fact a main transport route is in close proximity to the site is considered more of an asset than a safety risk. There are numerous homes within Newport which are within 0.5 miles of a dual carriageway or motorway.

Electricity Sub Station within 0.3 miles – The substation is fenced in and secure.

Railway within 0.5 miles – There are numerous homes within Newport which are within 0.5 miles of a railway line.

Proximity to Celtic Lakes – Development alongside water can enhance the setting of an area. Safety around lakes is something that children from all cultures need to be aware of and is not considered an obstacle to development.

Construction site for new M4 – The Council has safeguarded an area of land for the new M4. Welsh Government has not raised the proximity of the site to the new M4 as an issue.

Police/Crime/Perception of Crime – As with any other significant development, the Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.

Environment – The transit site will be clearly defined, maintained and managed. Any unauthorised expansion onto the SSSI is likely to be dealt with swiftly with Police action, who will be able to move on unauthorised encampments once the Council has a transit site.

Alternative Sites – Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

House Prices – The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.

Consultation Process - It is considered that the 6 week consultation process was sound. The proposals and consultation opportunities were advertised in the South Wales Argus, along with Newport Matters which is delivered to every home in Newport. All Community Councils were informed of the consultation, including Coedkernew. In addition, the consultation was advertised on the Council's website and thousands of letters were sent out to stakeholders and members of the public. It is acknowledged that there was a fault with Newport City Council's website during the weekend of 20/21 July. As a result, the Council took the reasonable step of extended the consultation for a further weekend.
### Representation Details

**Rep'n/Para/Policy**: 3735.L1//General  
**Agent**: Garnett, Lianne  
**Accession No**: 10/07/2013  
**Date Lodged**: 10/07/2013  
**Late?**: P  
**Source**: S  
**Type**: G&T  
**Mode**: P  
**Status**: M  
**Status Modified**:  

**Summary**: Supports the G&T allocations in the Plan.

---

**Item Question** | **Representation Text**
--- | ---
11 | Having been made aware of the revisions to the above plan and in particular reference to the location of the Gypsy and Travler sites as set out in the Plan, I accept and approve of the Revised Deposit Local Development Plan.

---

**Item Question** | **Council Responses**
--- | ---
13 | Support noted.
Representation Details

by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M
Rep'n/Para/Policy Repren*tor
Accession No Date Lodged Late? Source Type Mode Status Status Modified
3735.L2//SP08 Garnett, Lianne
10/07/2013 O M
Document:Revised LDP, p.22 Policy: SP08
Summary: Would like to see Land north of the A48 allocated as Special Landscape Area.

Item Question | Representation Text
---|---
11 | However, further improvement could be made to the Plan in protecting Langstone Village from further major development by adding the Countryside north of the A48 that is outside of the boundary settlement, up to and including Old Roman Road, and designate it as a 'Special Landscape Area'.

Item Question | Council Responses
---|---
13 | The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales’ guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.

3736.L1//Intro & O Everitt, Mr Peter
10/07/2013 E S M
Document:Revised LDP, p.6 Policy: Intro & Overview
Summary: Support the LDP proposals.

Item Question | Representation Text
---|---
11 | I would like to advise that I support and am in favour of the current LDP proposals.

Item Question | Council Responses
---|---
13 | Support noted.

12/02/2014
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<th>Item</th>
<th>Question</th>
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<tbody>
<tr>
<td>11</td>
<td>Representation</td>
<td>I would like to formally propose the speedway site at Newport, and the former Whiteheads land for the families involved as suitable gypsy/traveller sites. Which the traveller families there tonight agreed with and support.</td>
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<tr>
<td>12</td>
<td>Speaking at Public Examination</td>
<td>Yes</td>
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**Council Response**

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

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<td>11</td>
<td>Representation</td>
<td>Thank you for your letter date 5 June 2013, enclosing revised details of the above plan. I have perused the revised document, in particular all references to the location of the Gypsy and Traveller sites and find the Revised Deposit Local Development Plan acceptable and in accord with my views.</td>
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**Council Response**

Support noted.
Representation Details

by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M

Rep'n/Para/Policy Representer Agent Accession No Date Lodged Late? Source Type Mode Status Status Modified
3738.L2//SP08 John, Major (Retd) W M 11/07/2013 P O M

Document: Revised LDP, p.22
Policy: SP08
Summary: Propose the inclusion of Special Landscape Area in Langstone.

Item Question Representation Text

11 Representation
However, I believe that Langstone village should be further protected from any major development by adding to the Plan the Countryside north of the A48 that is outside the boundary settlement, up to and including Old Roman Road and designating it as a 'Special Landscape Area'.

Item Question Council Responses

13 Council Response
The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales' guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.
Representations Details

by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M

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<td>3739.L1/H15.01</td>
<td>Grainger, Angela</td>
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<td>11/07/2013</td>
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Document: Revised LDP, p.75
Policy: H15.01
Summary: Object to the G&T site at Celtic Way, Coedkernew.
I am writing to object to the proposed "Traveller Transit Site" at Celtic Way, Coedkernew, Newport. My objections are based on the following grounds, as the introduction of the proposed site will result in:-

- Increase in anti-social behaviour and noise pollution to the area
- Reduction to house prices
- Increase in criminal activity (theft, vandalism and criminal damage)
- Reduction in investment and future development of the area
- Environmental impact in terms of rubbish & sewage disposal
- Increased traffic to the area, causing additional road safety concerns
- Cost to local community in terms of initial set-up (proposed £6.3 million)

In listing these objections, I would like to take the opportunity to qualify them in terms of the impact they will have on our local community.

Increase in anti-social behaviour will occur in the forms of harassment, intimidating behaviour, excessive noise from motor vehicles, nuisance behaviour from loud or constant dog barking, fly-tipping, rubbish in gardens, dog fouling and noise pollution from power generators.

Increase in criminal activity in terms of such things as theft, vandalism, criminal damage to property, all of which have occurred within the Newport area on previous "visits" from travellers. Chief Superintendent Andy Street of Bedfordshire Constabulary wrote to Bedford Council after his force attended over 210 separate incidents in a 2 year period (or 1 every 3 days) stating: "The numbers & nature of incidents are not atypical for traveller sites. The likelihood of such sites causing problems for those living in close proximity is highly probable. This is if the police even attend such incidents; because widely documented in the press are occasions whereby police refuse to attend traveller sites for fear of an escalation of violence. We do not want a police "no-go" area which is a hotbed of criminal activity with no consequences to anyone committing such activities.

This is if the police even attend such incidents; because widely documented in the press are occasions whereby police refuse to attend traveller sites for fear of an escalation of violence. We do not want a police "no-go" area which is a hotbed of criminal activity with no consequences to anyone committing such activities.

Environmental impact to the area will be in terms of the rubbish & waste/sewage disposal which would have a huge impact. In as little back as May 2012, a family of travellers caused over £100,000 worth of damage & clean up costs to the Coedkernew area when they camped at the old LG site. This alone proves the lack of respect to both the immediate environment & the community as a whole. This damage was caused over a period of just a few weeks, you shudder to think how much damage and destruction could be reaped over a number of years. Other environmental impacts would be measured in terms of the level of traffic that is likely to entail form a busy "transit site".

Also, the safety of children in these current times is always a parental concern and this will be further heightened should the introduction of a traveller site in the immediate vicinity. Parents would be reluctant to allow their children out unaccompanied - I personally know that I would.

House prices typically reduce be around 40% where traveller sites are introduced into local communities. These facts are confirmed by the Halifax, who are the UK's largest provider of residential mortgages, stating that anti-social neighbours can shave up to £31,000 off the price of an average property. These figures are devastating to home owners who live in the proximity of proposed traveller sites and the possible drop in equity of property this would involve.

Cost to the local community - it is commonly understood why residents do not want traveller sites near their homes and it is absolutely up to the traveller community themselves to demonstrate that they can integrate into local communities. However, over previous years they have proved this cannot be achieved, with the point in being in May 2012 whereby travellers caused over £100,000 worth of damage & clean up costs to the Coedkernew area when they camped at the old LG site. The residents of Newport bore the cost of this damage, vandalism and clean-up operation.

Your proposed plans have a cost of £6.3 million which is an astronomical cost to taxpayers, money which can be utilised in a much more productive, expansive and inclusive way to fund services, facilities and projects that benefit a far greater cross-section of Newport residents. Imagine how much more funding could be ploughed into education, welfare, healthcare and leisure services in the local community if this £6.3 million could be invested more wisely in order that that community as a whole could benefit. Finally, the cost in terms of future economic investment to this region whereby firms will be adverse to making major developments right next to a travellers site. This could irreversibly affect Newport & impact the city in terms of jobs, service provision.

In the past, many councils' have dismissed objections as "urban myths" and then categories any local resident who wishes to raise objections to traveller sites as racist. However, this is abhorrently untrue; as it is not a matter of racism but of anti-social behaviour and the negative impact these traveller sites have on both local residents & the community as a whole. If the objections being received...
Representation Details

were in respect to a public house, nightclub or retail outlet then the council would take on-board the views of local residents, community businesses & law enforcement officers who all voice major concerns around the introduction of proposed sites;

Please consider all the objections raised by local residents as genuine, valid and lucid arguments against placing the traveller site in Coedkernew & reverse your decision to introduce the site at Celtic Way.

Item Question  Council Responses

13

Council Response

As with any other significant development, the Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.

The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

The site will have waste disposal facilities available. The Council does not envisage significant issues with regard to sewage disposal.

Highways have not submitted any concerns with regard to potential traffic implications.

In terms of the cost, the Council is aware of the financial implications to its budget.
### Representation Details

**Document:** Revised LDP, p.75  
**Policy:** General G&T  
**Summary:** Support Plan and particular reference to proposed Gypsy sites

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<td>11</td>
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**Agent**  
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**Late?**  
**Source**  
**Type**  
**Mode**  
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Representation Details

by: (No grouping)
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Rep'n/Para/Policy Representer                              Agent                                      Accession No    Date Lodged   Late?    Source   Type    Mode     Status     Status Modified
3740.L2//SP08 Bryant, Mr Roger                             12/07/2013 O M

Document: Revised LDP, p.22
Policy: SP08
Summary: Propose amended boundary of SLA at Langstone

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Document: Revised LDP, p.75
Policy: General G&T
Summary: Support plan and particular reference to location of Gypsy sites

**Item Question Representation Text**

11

Having been made aware of the revisions to the above plan and in particular reference to the location of the Gypsy and Traveller sites as set out in the plan, I find them acceptable, and I accept and approve the Revised Deposit Local Development Plan.

**Item Question Council Responses**

13

Support noted.
Representation Details

3741.L2/SP08 Bryant, Mrs Pamela

12/07/2013 O M

Document: Revised LDP, p.22
Policy: SP08

Summary: Propose new boundary to SLA at Langstone

Item Question Representation Text

However, further improvement could be made to the plan in protecting Langstone village from further major development by adding the countryside north of the A48 that is outside the boundary settlement, up to and including Old Roman Road and designate it as a “Special Landscape Area.”

Item Question Council Responses

13 13 Council Response

The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales’ guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.
## Representation Details

**by:** (No grouping)  
**Filtered to show:** (all of) Stage=L; Status=M

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**Document:** Revised LDP, p.75  
**Policy:** H15.01  
**Summary:** Objection to the G&T site in Celtic Way, Coedkernew.

### Item Question  
Representation Text

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<td>10</td>
<td>Soundness Test</td>
<td>C1 &amp; CE3</td>
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The land currently earmarked by Newport City Council for the "Transit Gipsy Site" is adjacent to land previously set aside for businesses and the development of those businesses. The proposed expansion of the Quinns Radiator Plan has now been called into question due to the problems which they envisage will occur if this site were to go ahead. The land also earmarked for "residential housing" on the old Panasonic site has now also been called into question due to the fact that Panasonic themselves anticipate a significant financial loss in value that this land would have previously attained were this gypsy transit site to be placed in such close proximity to this site. The follow on question is whether any housing developer would actually therefore take the chance on building new homes with the possibility that few people would not want to buy them. Any profit that would be made following the sale of these houses would also be comparatively reduced. It therefore appears that The Newport Development Plan 2011 - 2026 is therefore not actually addressing the area overall but reducing the opportunity for business development and making it a less desirable place in which to live overall.

CE3

The councils cannot provide actual specifics on how this transit site is going to be monitoring. No plan currently exists on how these "transit gipsys" are to be moved on were they to refuse to stay.

I would like to raise a formal objection to Newport City Councils proposal to allocate land for a Gypsy Transit site at Celtic Horizon following the meeting that was held at the Civic Centre on Wednesday 17 July 2013. At this meeting at which the Newport Local Development Plan for 2011/2026 was discussed it is very clear at that a high level of anger at this proposal exists within the Newport community.

Whilst many people accept the fact that the council is bound under the Welsh Assembly directive that land needs be found suitable for the needs of the travelling community, the siting of a transit camp at Celtic Horizon will bring significant detriment to this already deprived city and is clearly in total contradiction to any form of city development, based on simple logic alone. I have listed below a few key factors which, although are basic common sense to the vast majority of people, appears to have been ignored by whomsoever drew up and proposed the current plan and this is why this current proposal is significantly flawed and needs to be revisited.

1. At present, The Celtic Horizon Industrial area is and has been regarded as being quite prestigious for many years. This has led to inward investment such as Quinns Radiators, The Prison Service, Eads, to name but a few. Businesses will continue to be attracted to this well established area and therefore there is the potential for additional job development in the future as well as industrial investment. The revenue that this prosperity will bring could provide additional funds that could be used to benefit the wider community of Newport overall and from which all of its citizens could derive some benefit. At present there are some newly built office blocks with yet more office space being held at Imperial Park and surrounding areas, some of which are still unoccupied.

I would therefore put it to the planning department as well as the City Council that as Quinns Radiators have already confirmed that their planned expansion is now being put on hold as a direct result of the transit site at Celtic Horizon being put forward, is this not indicative of the fact that any new businesses are less likely to be attracted to or indeed invest in an area where those businesses will encounter the many problems associated with the travelling community which we are all aware of? This will clearly affect not only the economic viability of those businesses wanting to remain in this area but will have a devastating effect upon the job situation in Newport were they in fact to pull out altogether - which seems to be highly probable. If this were to take effect, this would not only be a direct contradiction to any form of development, but also show that this City's council has no idea what the impact on Newport overall will be.

2. It is also highly unlikely that the proposed railway station to be built at Coedkernew and covered in Newport City Councils' Development Plan to 2026 will ever be sanctioned by Arriva Trains Wales or First Great Western Trains due to the close proximity that this station will be to the transit site at Celtic Horizon if this indeed goes ahead. This again would confirm that the developments proposed in the plan will never be achieved and again will be detrimental to the area.

3. The Development Plan also states that the council is required to provide 10,350 housing units over the plan period. One of the sites earmarked for development is the old Panasonic site near to where this gypsy transit site will be located. As a member of the public, it is clear to see that if this gypsy transit site were to go ahead, the money derived from the sale of land previously occupied by the Panasonic organisation is likely to worth significantly less than what was originally anticipated. Does the council therefore believe that any housing developer is likely to take the chance on building new homes with the potential risk that they too will not make as much money from the sale of each unit than originally planned? Even though these properties are subsequently built, what is the chance of selling them or of families wanting to live in such close proximity to a gypsy site - whether it be a transit site or not?

4. Alternative sites within the city of Newport already exist and are suitable for the siting of the Gypsy transit site which do not have any impact upon existing business development or residential areas. This area is the "contingency area" on the old allotment site mentioned at the meeting which took place on Wednesday 17 July 2013 in the Civic Offices at Newport. If this site has already been agreed upon and set aside as a suitable contingency area, there should be no need for the proposed site at Celtic Horizon to have been suggested in the first place. This again shows that the city council do not utilise common sense.

5. The original proposed site on the A449 (which incidentally is the preferred location for the Travelling community) has now been proven to be of suitable size to accommodate this transit site if approached from the opposite direction to that suggested initially by the council. - even though this has been deleted by the Scrutiny committee. This should therefore be revisited and a further consultation exercise be undertaken concerning these proposals.

6. The gypsy sites in Carditt at Shire Newton and Rover Way respectively were originally setup in order to "contain the problem that the Gypsy community brings to any area in which they settle. It is common knowledge that these sites have now expanded out of all proportion and are continuing to do so year on year. This theory of containment has therefore been proven not to be workable and therefore if Newport City Council were to naively continue to ignore the lessons already being learned in Cardiff, the proposed transit site at Celtic Horizon will turn a currently prestigious housing development and Business park.
into nothing more than a ghetto area where no one will want to live or businesses invest in. This by sheer logic seems to be in direct contradiction to any City Development Plans currently being devised by Newport Planners.

7. At this meeting it was stated that the City Council have the power to Compulsory Purchase land from the WDA, if they so wish to therefore respectfully that if this indeed the case, that further investigation be carried out into the possibility of acquiring a large piece of land within the city if this is shown to be owned by the WDA and consideration be given to the setting up of just one site. This land could be used to contain both the fixed residential area as well as a transit site for the travelling community. If Newport City council were to do this, it would have the benefits of:

A) Containing the problem of the gypsy community in‘ one area - preferably away from the wider community so as to eliminate‘ the possibility of social conflict. 

B) The travelling community could be left alone to sort out their own issues of transit families potentially not wanting to move on when required to do so. This could reduce the amount of time and effort having to be expended in administration by the council -and police authority.

C) No human right issues would be ever called into question as the City Council will have fulfilled their obligation by providing both a transit and residential site for these people provided it was sited far enough away from all residential areas due to the fact that the travelling community do not want integration of any sort with the people surrounding them.

D) Once a suitably designated piece of land has been identified, the City Council should ensure that the potential for expansion at ANY TIME is negated due to the size of the plot allocated overall: - thereby learning from Cardiff City Council's experience. ’

E) At all times working with the wider community of Newport and ensuring that although an obligation exists‘by the council to locate suitable areas for these people, that consideration is given to the wider populace of Newport in order to ensure that no citizen in this city is adversely affected by the placement of these sites either by financial or emotional well-being issues. If Development is planned; then let it be for the benefit of ALL and not for the accommodation of the FEW. The current proposal of a transit site at Celtic Horizon is blatantly a contradiction of city development for the reasons stated in this letter.

8. Newport City Council also appear to have forgotten that the provision of either a transit site or indeed a permanent residential site will not end the problems that the travelling community have brought and continue to bring to this city. We all know that there are many gypsy caravans being kept in the many farms along the coast road towards St Brides. Although these are repeatedly stated to be used for housing gypsy workers, this does not stop these travellers spilling out into the outlying community, fly tipping and leaving their waste and rubbish for the law abiding citizen to pay for the removal of. It is bad enough that this once pleasant and attractive area has been spoiled and degenerated by the influx of the gypsy community. Does Newport City Council want to create yet another equally filthy area at Celtic Horizon, when this is one of the few more attractive areas left in the city at present. I respectfully request that ALL members of the city planning department, it's council members and also the members of the Scrutiny Committee consider the points that I have raised in this letter as were this proposal to be upheld, It is my opinion that Newport as a place for industrial investment, an attractive place in which to live and to bring up children in the future will be doomed. There has to be another way!
It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

No specific plan on how the site will be managed and monitored exists at present. The LDP is a strategic planning document and specific plans regarding the management of the site would not be contained in the LDP.

The Council does not envisage any implications with regard to the delivery of the proposed Coedkernew Railway Station if the transit site is built.

The planning application for the Panasonic site is progressing; therefore, the prospect of a transit site in close proximity does not appear to be a major obstacle.

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

As with any other significant development, the Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.
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<td>Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.</td>
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<td>I am writing with concern of the Development plan for the Gypsy sites. I live in Langstone and have done for 11 years now. A lot of redevelopment has transpired over the years and recently houses have gone up by the dozen. Langstone is a lovely area and if a gypsy/traveller site is agreed on in this area, it will put house prices down and other problems could occur. The location of the Gypsy site as set out on the plan, is acceptable and I accept and approve of the revised Deposit Local Plan.</td>
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<td><strong>Council Responses</strong></td>
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<td>13 13 Council Response</td>
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The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales’ guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.
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Document: Revised LDP, p. 75
Policy: General G&T
Summary: Support plan in particular location of Gypsy sites

**Representation Details**

**Item Question**

11 **Representation**

Having been made aware of the revisions to the above plan and in particular reference to the location of the Gypsy and Traveller sites as set out in the plan, is acceptable, and I accept and approve the Revised Deposit Local Development Plan.

**Council Response**

Support noted.
Representation Details

Document: Revised LDP, p.22
Policy: SP08
Summary: Propose amendment to the SLA in Langstone

---

**Representation**

However, further improvement could be made to the plan in protecting Langstone village from further major development by adding the countryside north of the A48 that is outside the boundary settlement, up to and including Old Roman Road and designate it as a "Special Landscape Area."

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**Council Response**

The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales’ guidance.

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Document: Revised LDP, p.75  
Policy: General G&T  
Summary: Support the Plan in relation to the Location of the Gypsy sites

**Item Question**  
**Representation Text**

11

Representation

Having been made aware of the revisions to the above plan and in particular reference to the location of the Gypsy and Traveller sites as set out in the plan, is acceptable, and I accept and approve the Revised Deposit Local Development Plan.

**Item Question**  
**Council Responses**

13

Council Response

Support noted.
Representation Details

Document: Revised LDP, p.22
Policy: SP08
Summary: Propose amendment to SLA boundary in Langstone

Representation

However, further improvement could be made to the plan in protecting Langstone village from further major development by adding the countryside north of the A48 that is outside the boundary settlement, up to and including Old Roman Road and designate it as a “Special Landscape Area.”

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The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales’ guidance.

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Document: Revised LDP, p.75
Policy: General G&T

Summary: Support the Plan in particular reference to Gypsy sites

**Representation**

Having studied the revisions to the above plan and in particular reference to the location of the Gypsy and Traveller sites as set out in the plan. I accept and approve the Revised Deposit Local Development Plan.

**Council Response**

Support noted.
I would wish to see a further improvement to the Plan, to protect Langstone village from further major development by adding the countryside north of the A48 that is outside the boundary settlement, up to and including Old Roman Road and designate it as a "Special Landscape Area."

The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales' guidance.

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Representation Details

Filtering to show: (all of) Stage=L; Status=M

Rep'n/Para/Policy: 3747.L1//General
Representor: Marsh, Mr S R

Document: Revised LDP, p.75
Policy: General G&T
Summary: Support the Revised LDP in particular the location of the Gypsy and Traveller Sites

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**Item Question: Representation Text**

11 Representation

Having been made aware of the revisions to the above plan and in particular reference to the location of the Gypsy and Traveller sites as set out in the plan, is acceptable, and I accept and approve the Revised Deposit Local Development Plan.

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**Item Question: Council Responses**

13 Council Response

Support noted.
However, further improvement could be made to the plan in protecting Langstone village from further major development by adding the countryside north of the A48 that is outside the boundary settlement, up to and including Old Roman Road and designate it as a "Special Landscape Area."

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### Representation Details

**Document:** Revised LDP, p.75  
**Policy:** General G&T  
**Summary:** Support Revised LDP in particular to reference of location of Gypsy sites

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**Representation**

Having been made aware of the revisions to the above plan and in particular reference to the location of the Gypsy and Traveller sites as set out in the plan, is acceptable, and I accept and approve the Revised Deposit Local Development Plan.

---

**Council Response**

Support noted.
However, further improvement could be made to the plan in protecting Langstone village from further major development by adding the countryside north of the A48 that is outside the boundary settlement, up to and including Old Roman Road and designate it as a "Special Landscape Area."

Council Response

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### Representation Details

**Author:** Branston, Dr J Robert

**Document:** Revised LDP, p.75

**Policy:** General G&T

**Summary:** Objection as to the proposed Gypsy and Traveller sites due to the lack of economic consideration for each site.

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<td>Delete an existing site</td>
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- I believe the plan as currently written fails the following test; P2, CE1 and CE2
- I believe the plan as currently written is fundamentally flawed and unsustainable on the basis that it does not offer due consideration to all economics aspects, most especially in terms of the construction of Gypsy and Traveller sites. Without the inclusion of all economic aspects when developing the plan, it can't be coherent, realistic or appropriate because it is not based on a completely robust and credible evidence base.

For instance, when considering the proposed Gypsy and Traveller sites the plan can only be meaningful if it not only considers planning aspects but also the costs involved in developing said sites. The council does not have unlimited financial resources and can't rely on the private sector to cover all of the costs involved. Thus if economics are not considered as an integral part of the plan, then it is nothing more than a wish list and thus cannot appropriately guide future development because it does not take into account the ability to deliver such projects. I might include ownership of a Rolls Royce car in my personal development plan as that is the car I most desire but when I include economic constraints I realise that this is completely unaffordable and so I need a more affordable car in my now meaningful and realistic plan. In the case of the plans for Gypsy and Traveller sites for the locality, and indeed other parts of the LDP, they can only be meaningful if they consider both the planning desirability but also the costs involved in the development of such sites. To include both aspects would generate a sensible and realistic plan as most developments are a compromise between what planners would ideally like to see and what is actually affordable. The Gypsy and Traveller sites currently included in the plan will costs large amount of money to develop, both in terms of the money the council will have to pay out but also in terms of money forgone because alternative development would be impossible (i.e. opportunity cost to an economist). If costs of development were included as a feature of the plan then it is very likely that other sites would be appropriately included as they might be less desirable from a planning point of view but would be more affordable in terms of delivery.

- I would like to speak on the lack of consideration of the economics within the plan. As a professional economist I believe I am well qualified to speak on this issue.

**Item Question** | **Tick-box reply** |
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**Council Responses**

**Item Question** | **Response**
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<td>Item Question</td>
<td>Council Responses</td>
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12/02/2014
The Council has published a 'Delivery and Implementation Paper' which notes when the Council envisages development will come forward and how it will be delivered. The Council and Planning Inspector will need to have a reasonable degree of confidence that development outlined in the Plan will actually get delivered. Therefore the economics and viability are key considerations in this.

Scrutiny Committee, Cabinet and Council have considered the financial implications of the proposals. Excluding the lost land receipt if the Council cannot sell its land at Hartridge Farm Road for residential development, the options selected in the LDP as the preferred sites are the cheapest of the options in terms of site delivery costs.

Whittaker, Ms Carol

I wish to register my objection to the proposed gypsy transit site at Celtic Way Newport which forms part of the LDP for Newport.
I am writing to you with utmost disgust at Newport council's planning dept with regards to the proposed plans for the gypsy travellers site planned for Celtic Way, Coedkernew. Upon reading your scrutiny report with regards to selection of this area that stated you used common sense, the common sense part being that you plan to put a travellers transit site smack bang in the centre of a up and coming commercial area that has taken Newport Council at least 8 years to get back on its feet since the demise of LG Electronics, Myself and family have lived in Newport for 11 years, working and paying council tax for the said time, my property is currently worth an estimate £675,000.00 and as common sense prevails with Newport planners and I see it as a valid point that my house which is less that 500 meters away from the site in question will not depreciate drastically, this will change mine and my familys life completely, the planners are worried about the travellers human rights WHAT ABOUT MINE AND MY FAMILYS (of which I have young kids). Newport council has a camp site not 930 meters awaying the grounds of Tredegar Park that you pay and stay just as the criteria off the travellers site you are planning but unfortunately in the eyes of Newport Council the travellers are not welcome (racist). Newport Council have spent thousands of pounds to keep travellers out of Tredegar Park having fencing put around the grounds yet you want to spend tax payers money on putting them smack bang in the middle of a commercial estate costing local business money added security, cleaning and a constant headache. Please where is the common sense. As residents we should able to sue Newport Council for the detrimental effeect this plan will have on our lives, area, well being and depreciation of properties. I have worked all my life and cannot afford to loose this money. I do not want this to go ahead at Celtic Way.

The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.
Representation Details

Document: Revised LDP, p.75
Policy: H15.01
Summary: Objection to the proposed Gypsy transit site at Celtic Way

Representation

I have numerous concerns about the planned gypsy travellers transit site proposed for Celtic Way, Coedkernew. As a home owner living less than 500 meters away from the proposed site with the value of my property currently stands at £675,000.00, which will become severely depreciated, I cannot believe that in one hand you have done and are doing a great job in encouraging new business into the Coedkernew area and on the other hand you are proposing a gypsy travellers transit site smack bang in the middle. This will have a detrimental effect on proposed new business and development in the area and will cause a massive ongoing problem for the existing businesses and possibly drive many of them out of the area and county. The remaining development land left around this development site will be worthless and I find it hard to believe that WAG would sell you this site knowing that the remainder of their land in the area would probably not be developed and possible sold off to other gypsy traveller families as no other business in their right mind would buy it creating an even bigger problem for local residents and businesses.

Council Response

The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.
Representation Details

Document: Revised LDP, p.75
Policy: H15.01
Summary: Objection to proposed gypsy site at Celtic Way

I am writing to object about the proposed transit traveller site at Celtic Way Newport which have been included in the LDP. I base my objections on the plan for this site on the following:

- The introduction of the transit site will result in additional noise pollution of generators, dogs and vehicle movement for the existing residential properties on Celtic Horizon.
- The site is very close to an electricity sub-station which could be a potential danger to the travellers especially their young children.
- There is mainline railway line in close proximity that again could cause issues for the safety of the travellers children
- It would potentially deter new business investment and therefore employment opportunities to Imperial Park. A fact which was noted in your initial assessment of the site.
- This development could result in a change in local environment potential increase of anti-social behaviour and the ‘right for quiet enjoyment’ in our homes and community. This final fact has
- Cheshire police suggest all traveller sites “should have surveillance covering all the site and it should be identified as a private area with restrictions on unauthorised access as far as possible. Records should be kept of all caravans with details.” I have not seen any plans from NCC that incorporate this type of surveillance record keeping or administration

I hope these objections are enough for the council to reconsider this decision, with the alternative site on the A449 a viable option I would urge you to re-exam that site as a possible solution for the transit site.

Council Response

The site will be designed as a transit site and therefore only used by Gypsy/Travellers on a temporary basis as they pass through Newport. It is expected that the Gypsy/Travellers will use their vehicles to move around and there will be limited activity in terms of moving around the area on foot. The Council does not envisage problems with regard to noise pollution.

The substation is fenced in and secure.

As with any other significant development, the Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.

Details of site management have not yet been produced. The LDP is a strategic planning document and therefore doesn't include this detail.

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
### Representation Details

<table>
<thead>
<tr>
<th>Rep'n/Para/Policy</th>
<th>Representer</th>
<th>Agent</th>
<th>Accession No</th>
<th>Date Lodged</th>
<th>Late?</th>
<th>Source</th>
<th>Type</th>
<th>Mode</th>
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<tr>
<td>3754.L2//H15.01</td>
<td>Mr Gethyn Ellis</td>
<td></td>
<td>12/07/2013</td>
<td>E O M</td>
<td></td>
<td></td>
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Document: Revised LDP, p.75

Policy: H15.01

Summary: Propose use of A449 as an alternative to the site proposed at Celtic Way.

**Item Question**

**Representation Text**

- This site was initially a second choice site. The decision to promote it to be the preferred choice occurred very late in the day. I only found out about this change in choice of preferred transit site the day before the initial council vote took on the LDP. This did not leave me with enough time to voice my objections or voice my own concerns. As I think you’ll agree.

- The initial preferred site was on the A449, which in my opinion would be a much more suitable location, it will had good transport links, would allow closer integration with the local community there and it offers a safer surrounding environment for the traveller community.

I hope these objections are enough for the council to reconsider this decision with the alternative site on the A449 a viable option I would urge you to re-exam that site as a possible solution for the transit site.

**Council Response**

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
Document: Revised LDP, p. 75
Policy: H15.01
Summary: Objection to Gypsy site proposed at Celtic Way

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<tr>
<td>7</td>
<td>Delete an existing site</td>
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<td>9</td>
<td>Candidate Site Reference</td>
</tr>
<tr>
<td></td>
<td>Proposed Gypsy &amp; traveller transit site at Celtic Way, Marshfield</td>
</tr>
<tr>
<td>10</td>
<td>Soundness Test</td>
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<td></td>
<td>C4 - It does NOT meet with local community strategies</td>
</tr>
<tr>
<td>11</td>
<td>Representation</td>
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<td></td>
<td>the local community have been represented at many meetings with petition signed that it is inappropriate to place a Gypsy transit site in this area. The proposed site is in reasonable distance to community housing and will cause a clear disruption to general community harmony and living. The plan needs to be changed so that the proposed transit site is situated well away from already established housing and community centres. The expected crime rate and effect on adjacent communities will be detrimental and very costly to the local council in terms of policing and waste removal not to mention legal costs incurred to correct traveller transgressions. The community have spoken on this matter - please listen.</td>
</tr>
<tr>
<td>12</td>
<td>Speaking at Public Examination</td>
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</tbody>
</table>

Council Response

As with any other significant development, the Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.

There will be waste management facilities provided at the transit site.
### Representation Details

**Document:** Revised LDP, p.75

**Policy:** General G&T, p.75

**Map:** Proposals West: Proposals Plan - West

**Summary:** Objection to Gypsy site at Hartridge Farm Road and suggested two alternative sites at Mendalgief Road and Pye Corner.

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<tr>
<th>Item Question</th>
<th>Representation Text</th>
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<td>5 5</td>
<td>Add a new site</td>
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**Representation**

The Hartridge Farm Road Site proposed for a huge Gypsy Travellers Site is unsuitable as it is near a very busy dual carriage way that has seen its fair share of fatalities (before it was a dual carriage way). Very near a railway line and has boggy marsh land to the left of it which floods in winter, and has caused damage to neighbouring Ringland properties. It also is home to many wildlife species, which would be greatly effective, due to the enormity of the proposed site. Surely the site at Mendalgief Road Newport would be more suitable. This land is extremely close to both Llanwern High/Welsh School and I have personally heard parents say they will withdraw their children from these schools if this site goes ahead. That will be an extremely criminal waste of a fantastic state of the art school. Ringland is already over populated and is listed as a deprived area which has the help of Flying Start for its 2-3 year olds. If this site goes ahead it will be massive strain on an already deprived area. The spytty retail park is a growing thriving shopping complex and surely some of this land would be of better use as added shopping outlets or carparking for the outlet which will create jobs.

**Policy Number: Part 4**

**Paragraph or section number(s):** Alternative Sites

Please note the title of the inset plan you are commenting on - Gypsy/Traveller Accommodation

**Council Response**

There are no flood risk issues at Hartridge Farm Road providing a buffer is left at the southern edge of the site adjacent to the railway. The area to the west of the site would not be developed and is designated a Site of Importance for Nature Conservation.

The site will be well screened and should not impact on Llanwern High School or Ysgol Gymraeg Casnewydd. Perception of Gypsy/Travellers at the School is something that the Council will need to address through interaction with the Head Teacher and Governors.

It is acknowledged that the Hartridge Farm Road site will require improvements to the access road including the provision of a length of pavement. This will be agreed as part of a planning application and is not considered insurmountable.

**Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.**
Representation Details

by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M

Rep'n/Para/Policy  Representer  Agent  Accession No  Date Lodged  Late?  Source  Type  Mode  Status  Status Modified
3756.L2//General  Stock, Miss Phillipa  

Document:Revised LDP, p.75
Policy: General G&T  Map: Proposals East: Proposals Plan - East
Summary: Proposed alternative gypsy site at Mendalgief Road and Pye Corner instead of site at Hartridge Farm Road.

11  Representation
There is also a site at pye corner that has been there for many years, which would be more suitable for the 3 families. Also, Mendilgief road is another more suitable site, not near a dual carriageway and more central.

Policy Number: Part 4
Paragraph or section number(s): Alternative Sites
Title of inset plan: Gypsy/Traveller Accommodation.

12  Speaking at Public Examination
As the meeting on the 8th July at the ringland community centre was very short many people felt they did not have the chance to voice their opinions or ask their questions. Many good questions were asked and NOT answered.

2  Soundness of LDP

Council Responses

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
### Representation Details

*Document: Revised LDP, p.75*
*Policy: H15.01*

**Summary:** Objection to proposed Gypsy site at Celtic Way

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<tr>
<th>Rep'n/Para/Policy</th>
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<tr>
<td>L1/H15.01</td>
<td>Scott, Ms Claire</td>
<td></td>
<td>3757.L1/H15.01</td>
<td>13/07/2013</td>
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**Item Question**  
**Representation Text**
I am writing to object to the proposed “Traveller Transit Site” at Celtic Way, Coedkernew, Newport. My objections are based on the following grounds, as the introduction of the proposed site will result in the following:

- Increase in anti-social behaviour & noise pollution to the area
- Reduction to house prices
- Increase in criminal activity (theft, vandalism & criminal damage)
- Reduction in investment & future development of the area
- Environmental impact in terms of rubbish & sewage disposal
- Increased traffic to the area, causing additional road safety concerns

Whilst I’m sure that you feel that spending £6.3 million of taxpayers money on a project for those who contribute nothing with regards to tax, is both worth while and justified, I urge you to consider our justified reasons for such objections.

Increase in anti-social behaviour will occur in the forms of harassment, intimidating behaviour, excessive noise from motor vehicles, nuisance behaviour from loud or constant dog barking, fly-tipping, rubbish in gardens, dog fouling & noise pollution from power generators.

Increase in criminal activity in terms of such things as theft, vandalism, criminal damage to property, all of which have occurred within the Newport are on previous “visits” from travellers.

Environmental impact to the area will be in terms of the rubbish & waste/sewage disposal which would have a huge impact. In as little back as May 2012, a family of travellers caused over £100,000 worth of damage & clean up costs to the Coedkernew area when they camped at the old LG site. This alone proves the lack of respect to both the immediate environment & the community as a whole. This damage was caused over a period of just a few weeks, you shudder to think how much damage & destruction could be reaped over a number of years. Other environmental impacts would be measured in terms of the level of traffic that is likely to entail from a busy “transit site”.

Also, the safety of children in these current times is always a parental concern and this will be further heightened should the introduction of a traveller site in the immediate vicinity. Parents would be reluctant to allow their children out unaccompanied – I personally know that I would.

House prices typically reduce by around 40% where traveller sites are introduced into local communities. These facts are confirmed by the Halifax, for whom I work, who are also the UK’s largest provider of residential mortgages, stating that anti-social neighbours can shave up to £31,000 off the price of an average property. These figures are devastating to home owners who live in the proximity of proposed traveller sites & the possible drop in equity of property this would involve. I do believe that we could seek legal representation should this happen against the council for allowing this to happen.

Cost to the local community - it is commonly understood why residents do not want traveller sites near their homes and it is absolutely up to the traveller community themselves to demonstrate that they can integrate into local communities. However, over previous years they have proved this cannot be achieved, with the case in point being in May 2012 whereby travellers caused over £100,000 worth of damage & clean up costs to the Coedkernew area when they camped at the old LG site. The residents of Newport bore the cost of this damage, vandalism & clean-up operation.

Your proposed plans have a cost of £6.3 Million which is an astronomical cost to taxpayers, money which can be utilised in a much more productive, expansive & inclusive way to fund services, facilities & projects that benefit a far greater cross-section of Newport residents. Imagine how much more funding could be ploughed into education, welfare, healthcare & leisure services in the local community if this £6.3 million could be invested more wisely in order that the community as a whole could benefit. Finally, the cost in terms of future economic investment to this region whereby firms will be adverse to making major developments right next to a travellers site. This could irreversibly affect Newport & impact the city in terms of jobs, service provision, says that anti-social neighbours can shave up to £31,000 off the price of the average property.

Councils are now far too quick to dismiss objections as “urban myths” and are reluctant to investigate such objections in a thorough and unbiased manner. I wonder if such approach would be taken if a travellers site was proposed in the proximity of their homes?? Travellers sites quite simply have a negative impact traveller on both local residents & the community as a whole. If the objections being received were in respect to a public house, nightclub or retail outlet then the council would take on-board the views of local residents, community businesses & law enforcement officers who all voice
Please consider all the objections raised by local residents as genuine, valid & lucid arguments against placing the traveller site in Coedkernew & reverse your decision to introduce the site at Celtic Way. We do hope that recent sightings of heavy machinery on the proposed site is not an early indication that the views and concerns of local residents and businesses have been dismissed and our concerns for both our community and children alike have been disregarded in favour of this toxic development.

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<th>Item</th>
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<th>Council Responses</th>
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<td>13</td>
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<td>As with any other significant development, the Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.</td>
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<td>The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.</td>
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<td>It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.</td>
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<td>The transit site will have waste facilities on site.</td>
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<td>Highways have not raised any concerns with regard to traffic increases.</td>
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<td>The Council is aware of the financial implications to its budget. No work has commenced on this site. The heavy machines seen were likely to be those demolishing a building on an adjacent site.</td>
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<td>Item Question</td>
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<td>11.11</td>
<td>As a resident I have not been sufficiently informed by the council by the plans to build a gypsy transit camp at Celtic Way, it seems covert in that no leaflets have been distributed and the first time I found out was when I picked up a leaflet from Coedkernew Residents in the fish and chip shop at Tredegar House. My concerns revolve around the use of prime land for business expansion. The area has several businesses so the council should be promoting this land to encourage business growth thus creating jobs. Another point is that at rush hour in the morning and evenings, the area is already congested with traffic entering and leaving the businesses, the coming and going of caravans would exacerbate this situation.</td>
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<th>Council Responses</th>
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<td>13.13</td>
<td>It is considered that the 6 week consultation process was sound. The proposals and consultation opportunities were advertised in the South Wales Argus, along with Newport Matters which is delivered to every home in Newport. All Community Councils were informed of the consultation, including Coedkernew. In addition, the consultation was advertised on the Council’s website and thousands of letters were sent out to stakeholders and members of the public. It is acknowledged that there was a fault with Newport City Council’s website during the weekend of 20/21 July. As a result, the Council took the reasonable step of extended the consultation for a further weekend. The site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.</td>
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Representation Details

by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M

Rep'n/Para/Policy Representer Agent Accession No Date Lodged Late? Source Type Mode Status Status Modified

3759.L1//SP05 Edwards, R & J 16/07/2013 S M

Document: Revised LDP, p.21
Policy: SP05
Summary: Support for LDP, however amendment to SLA to the north of Langstone is proposed.

---

11 Representation
The latest revisions to the above plan together with the latest site for the gypsies now make it an acceptable plan to approve.
Leaving the Gorelands developments outside of the plan is a good idea as it will stop the visual impact of a huge housing estate. This area could be classed as a special landscape area to protect it in the future. The loss of development land could be counteracted by allowing future projects to be permitted on more hidden sites, eg. Towards the church, behind the New Inn or along the Magor road.
Placing the Gypsy sites where you have suggested should make the sale of the new properties a lot easier.

---

13 Council Response
Support noted.

With regards to the amendment to the SLA: The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales’ guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.
### Representation Details

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<tr>
<th>Rep'n/Para/Policy</th>
<th>Representor</th>
<th>Agent</th>
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<td>3760.L1//General</td>
<td>Hurford, Mrs Gwen</td>
<td></td>
<td></td>
<td>16/07/2013</td>
<td>P</td>
<td>S</td>
<td>M</td>
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Document: Revised LDP, p.75

Policy: General G&T

Summary: Support the plan, including the removal of gypsy and traveller sites in Nash/Goldcliff/Whitson.

---

**Representation Text**

**I am writing in response to the Revised Deposit Plan June 2013 to the Newport Local development Plan 2011-26.**

The removal of the proposed gypsy sites from Nash/Goldcliffe/Whitson area has my upmost support, as the levels in this area are not suitable for any type of development, let alone a single storey, temporary dwelling that could take the biggest impact of all from flooding. The area is not supported my mains drainage, a sustainable transport solution, or adequate highways to support a transitional living encampment.

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**Council Response**

Support noted.

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### Representation Details

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<td>Barradell, Mr David</td>
<td></td>
<td></td>
<td>12/07/2013</td>
<td>P</td>
<td>S</td>
<td>M</td>
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</table>

Document: Revised LDP, p.75

Policy: General G&T

Summary: Support for the proposed Gypsy and Traveller sites within the plan.

---

**Representation Text**

**Having seen the revisions to the above plan and in particular the new location of the Gypsy and Traveller sites as set out in the plan I am pleased to accept and approve the Revised Deposit Local Development Plan.**

---

**Council Response**

Support noted.
## Representation Details

**Document:** Revised LDP, p.22  
**Policy:** SP08  
**Summary:** Suggested that the Special Landscape Area located to north of Langstone be extended.

<table>
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<tr>
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<th>Representation Text</th>
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<tr>
<td>11 11 Representation</td>
<td>A further improvement could be made to the Plan which would protect Langstone Village from any further major development by adding the Countryside north of the A48 that is outside of the boundary settlement, up to and including Old Roman Road, and designate it as a 'Special Landscaped Area'.</td>
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<table>
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<tr>
<th>Item Question</th>
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</table>
| 13 13 Council Response | The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales’ guidance.  

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan. |
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<td>Barradell, Mrs Anne</td>
<td>16/07/2013</td>
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<td>S</td>
<td>M</td>
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</table>

Document: Revised LDP, p.75

Policy: General G&T

Summary: Support for the LDP, including location of Gypsy and Traveller sites.

**Item Question Representation Text**

11 11 Representation

Having seen the revisions to the above plan and in particular the new location of the Gypsy and Traveller sites as set out in the plan I am pleased to accept and approve the Revised Deposit Local Development Plan.

**Item Question Council Responses**

13 13 Council Response

Support noted.
Document: Revised LDP, p.22
Policy: SP08

Summary: Suggested that the Special Landscape Area to the north of Langstone be extended.

**Representation**

A further improvement could be made to the Plan which would protect Langstone Village from any further major development by adding the Countryside north of the A48 that is outside of the boundary settlement, up to and including Old Roman Road, and designate it as a ‘Special Landscaped Area’.

**Council Response**

The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales’ guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.
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<td>15/07/2013</td>
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</table>

Document: Revised LDP, p.75

Policy: General G&T

Summary: Support the Revised LDP with particular reference to location of Gypsy sites

**Item Question**

**Representation Text**

11  Rep: Having studied the revisions to the above plan and in particular reference to the location of the Gypsy and Travellers sites as set out in the plan. I accept and approve the Revised Deposit Local Development Plan.

**Council Response**

13  Support noted.
I would wish to see a further improvement to the Plan, to protect Langstone village from further major development by adding the Countryside north of the A48 that is outside of the boundary settlement, up to and including Old Roman Road, and designate it as a Special Landscaped Area.

The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales' guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.
I feel that I need to voice my concerns/objections regarding the proposed Traveller Transit Site at Celtic Way, Marshfield. Despite suggestions otherwise I believe, and perceive that there has been little or no consultation. An article written in the local Argus paper does not constitute consultation. I believe a flyer should have been delivered to all affected households, the current process has an perceived air of underhandedness which should and could have been avoided with proper consultation.

I also believe that the economic impact on the area is being understated. Is it wise to place this transit site in an already declining industrial estate? This area has seen in recent years a number of large businesses either make significant redundancies or relocate the main business elsewhere, this would be another nail in the coffin of Celtic Way. The knock on effect of this travellers site will no doubt be reduced house prices, both directly from the site and indirectly from reduced business uptake in the area.

It also appears that the primary transit site listed at the A449 is being dismissed due to concerns raised by one business, the Celtic Manor. Whilst I agree that local businesses should be encouraged and provide valuable income to the area, I do not believe that an individual companies/individuals concerns should outweigh the majority, no matter what financial benefits they provide.

Finally, from a more personal perspective, during recent Traveller camps within Tredegar Park there have been instances where travellers have frequently used the pathways along the Reens around Celtic Way and Manor Park as a motorcycle play area, the noise impact from this activity is substantial and unwelcome.
Council Response

It is considered that the 6 week consultation process was sound. The proposals and consultation opportunities were advertised in the South Wales Argus, along with publicity in Newport Matters which is delivered to every home in Newport. All Community Councils were informed of the consultation, including Coedkernew. In addition, the consultation was advertised on the Council's website and thousands of letters were sent out to stakeholders and members of the public. It is acknowledged that there was a fault with Newport City Council's website during the weekend of 20/21 July. As a result, the Council took the reasonable step of extended the consultation for a further weekend.

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

As with any other significant development, the Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.
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<td>15/07/2013</td>
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**Document:** Revised LDP, p.75  
**Policy:** H15.01  
**Map:** Proposals West: Proposals Plan - West  
**Summary:** Objection to the Gypsy and Traveller at Celtic Way propose site at A449.

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<td>Delete an existing site</td>
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<td>10 10</td>
<td>Soundness Test</td>
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<td>11 11</td>
<td>Representation</td>
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The A449 site should be the site for the Gypsy Transit. The reasons for this are 1) it can be contained whereas Celtic Way cannot as there is too much 'free' neighbouring land. Gypsy roam and will set up as close to the transit site as possible when its full encroaching closer to residential homes and the SSI/Flood Plain. There has been problems in the past in the area whereby the Gypsy's set up camp illegally and they became a drain on local resources to move on. 2) Employment opportunities in the area will reduce as local businesses will move and housing developers will choose alternative sites so our community cont evolve. This would not be the base at the A449 site. 3) The land at Celtic Way is WAG owned where as the A449 is council owned. Why don’t you spend the money it would cost to purchase Celtic Way on improving the slip road at the A449 site? Does it even need upgrading i.e. traffic used the slip roads for the Ryder cup so adopt the same traffic management policy. The Gypsy's have to contact you before turning up so this Traffic Management would not necessarily by enforced all day every day. Therefore spend the money on Affordable housing for younger people struggling to get on the property ladder or even o the many homeless people in Newport town centre. 4) Celtic Way should be a safety concern i.e. the HGV’s that operate in the area. The site is full of drainage ditches and water courses and its not lit at all. Its dangerous! 5) Please listen to your community, the tax payer. I don’t want the site at Celtic Way. Gypsy Travellers don’t give anything to the local community but take a lot and cause much social unrest. Locate them at the A449 site so that Coedkernew can continue to flourish in business and property development.

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<th>Item Question</th>
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<td>Speaking at Public Examination</td>
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<td>2 2</td>
<td>Soundness of LDP</td>
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**Item Question Council Responses**
Council Response

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

The site will be designed as a transit site and therefore only used by Gypsy/Travellers on a temporary basis as they pass through Newport. It is expected that the Gypsy/Travellers will use their vehicles to move around and there will be limited activity in terms of moving around the area on foot. Therefore the fact there is poor street lighting and a lack of pavement is not considered to be a significant concern. Increased street lighting could be provided if Members consider it to be essential.

Development alongside water can enhance the setting of an area. Safety around lakes is something that children from all cultures need to be aware of and is not considered an obstacle to development.
Object to proposed Gypsy and Traveller transit site at Celtic Way

The A449 site should be the site for the Gypsy Transit. The reasons for this are: 1) It can be contained whereas Celtic Way cannot as there is too much 'free' neighbours land. Gypsey roam and will set up as close to the transit site as possible when its full encroaching closer to residential homes and the SSI/Flood Plain. There has been problems in the past in the area whereby the Gypsy’s set up camp illegally and they became a drain on local resources to move on. 2) Employment opportunities in the area will reduce as local businesses will move and housing developers will choose alternative sites so our community cont evolve. This would not be the base at the A449 site. 3) The land at Celtic Way is WAG owned where as the A449 is council owned. Why don’t you spend the money it would cost to purchase Celtic Way on improving the slip road at the A449 site? Does it even need upgrading i.e. traffic used the slip roads for the Ryder cup so adopt the same traffic management policy. The Gypsey’s have to contact you before turning up so this Traffic Management would not necessarily be enforced all day every day. Therefore spend the money on Affordable housing for younger people struggling to get on the property ladder or even o the many homeless people in Newport town centre. 4) Celtic Way should be a safety concen i.e. the HGV’s that operate in the area. The site is full of drainage ditches and water courses and its not lit at all. Its dangerous! 5) Please listen to your community, the tax payer. I don’t want the site at Celtic Way. Gypsey Travellers don’t give anything to the local community but take a lot and cause much social unrest. Locate them at the A449 site so that Coedkernew can continue to flourish in business and property development.

Paragraph section number(s) H15 & H17.
Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

The site will be designed as a transit site and therefore only used by Gypsy/Travellers on a temporary basis as they pass through Newport. It is expected that the Gypsy/Travellers will use their vehicles to move around and there will be limited activity in terms of moving around the area on foot. Therefore the fact there is poor street lighting and a lack of pavement is not considered to be a significant concern. Increased street lighting could be provided if Members consider it to be essential.

Development alongside water can enhance the setting of an area. Safety around lakes is something that children from all cultures need to be aware of and is not considered an obstacle to development.
### Representation Details

**Representor:** Mrs C Whittaker

**Summary:** Propose amendment of SLA at Langstone

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<th>Question</th>
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<tr>
<td>11</td>
<td></td>
<td>However, further improvement could be made to the plan in protecting Langstone village from further major development by adding the Countryside north of the A48 that is outside of the boundary settlement, up to and including Old Roman Road, and designate it as a Special Landscaped Area.</td>
</tr>
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</table>

### Council Responses

**Council Response**

The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales’ guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.
Thank you for forwarding details of the above Plan. Having read the revisions to the plan and in particular, all references to the location of the Gypsy and Traveller sites, I find myself in full agreement with the Revised Deposit Local Development Plan.

Support noted.
Representation Details

Document: Revised LDP, p.22
Policy: SP08
Summary: Proposed amendment to boundary of SLA in Langstone

---

**Item Question** Council Responses

11 11 Representation

However, I believe that Langstone village should be further protected from major development by addition to the Plan, the Countryside north of the A48 that is outside of the boundary settlement, up to and including Old Roman Road and designating it as a 'Special Landscaped Area'.

---

13 13 Council Response

The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales’ guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.
**Representation Details**

**Rep'n/Para/Policy**: 3768.L1/General

**Representor**: Roy, Heather

**Accession No**: 16/07/2013

**Date Lodged**: 16/07/2013

**Late?**: E

**Source**: S

**Type**: M

**Status**: M

**Status Modified**: M

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**Document**: Revised LDP, p.75

**Policy**: General G&T

**Summary**: Support for G and T allocations in the LDP

---

**Item Question** | **Representation Text**
---|---

11 11 Representation

Having been made aware of the revisions to the above plan and in particular reference to the location of the Gypsy and Traveller sites as set out in the plan, I accept and approve of the Revised Deposit Local Development Plan.

---

**Item Question** | **Council Responses**
---|---

13 13 Council Response

Support noted.
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</table>
I am extremely concerned about the proposed Celtic Horizon Traveller/Gypsy site. I object to this in the strongest possible terms as I feel that the proposed site could have a serious negative impact on the well being of local residents. From sites that have been established elsewhere in the UK there is a significant amount of evidence that the setting up of such sites would have such an impact.

I urge Newport Council to consider alternative sites that will not have such a detrimental effect on the local Celtic Horizon neighbourhood.

---

**Council Response**

Objection noted.

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

---

The full consultation comments are available to view against representation reference 3769.L1.

---

**Council Response**

Please see response to 3769.L1
### Representation Details

**Document:** Revised LDP, p.75  
**Policy:** H15.02  
**Summary:** Support use of former Ringland Allotments as an alternative to proposed site at Celtic Way.

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<td>Alternative Appropriate Sites</td>
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Those that attended the NCC LDP presentation were invited to propose alternative sites. I/we consider that there are 2 such sites which have already had a sustainability appraisal and I/we better meet the criteria for Gypsy Traveller Transit sites:

- **Ringland Allotments**

Unlike the land at Celtic Way, this site is owned by NCC and therefore no negotiation of commercial transaction would be required. Within Welsh Government Gypsy Traveller Good Practice Guide section 3.2 (page 44), it states that transit sites have been “successful where transit sites are...provided adjacent to the main site”. This site is on the main identified transit route and there would be financial gains to be made in terms of reduced management costs, police surveillance, waste collection, and mains service provision as a result of both sites being situated in the same location. I/we feel this is vitally important as it would support the local authorities duty of careful of tax payer’s money.

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<td>12</td>
<td>Speaking at Public Examination Yes</td>
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12/02/2014
Ringland allotments, taken together, have been identified as a contingency site for transit accommodation.

The following points address concerns regarding the proposed transit site at Celtic Way:

Location and Design – The proposal is for a transit site providing temporary short-term accommodation, rather than a permanent place to live. In this context, the adjacent land uses to the Celtic Way site are not considered to be hazardous, however it is agreed that they are not suitable places for children to play. The indicative layout of the transit site will include green areas for play and therefore children will have onsite facilities.

24/7 access of HGV/movement of employees – The site will be designed as a transit site and therefore only used by Gypsy/Travellers on a temporary basis as they pass through Newport. It is expected that the Gypsy/Travellers will use their vehicles to move around and there will be limited activity in terms of moving around the area on foot. Therefore the fact there is poor street lighting and a lack of pavement is not considered to be a significant concern. Increased street lighting could be provided if Members consider it to be essential.

Cardiff to Newport dual carriageway is within 0.5 miles – The fact a main transport route is in close proximity to the site is considered more of an asset than a safety risk. There are numerous homes within Newport which are within 0.5 miles of a dual carriageway or motorway.

Crime/Perception of Crime – As with any other significant development, the Council has liaised with the police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the police if any incidents of crime that relate to the site are reported.

Alternative Sites – Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
Having been made aware of the revisions to the above plan and in particular reference to the location of the Gypsy and Traveller sites as set out in the plan, is acceptable, and I accept and the approve the Revised Deposit Local Development Plan.

Support noted.
Representation Details
by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M
Rep’n/Para/Policy Representer Agent Accession No Date Lodged Late? Source Type Mode Status Status Modified
3770.L2//SP08 Wojcik, Ms J 17/07/2013 C M

Document: Revised LDP, p.22
Policy: SP08
Map: Proposals East: Proposals Plan - East
Summary: Suggested addition of land to Special landscape Area to the north of Langstone.

Item Question Representation Text
11 Representation
However, further improvements could be made to the Plan in protecting Langstone Village from further major development by adding the Countryside north of the A48 that is outside of the boundary settlement, up to and including Old Roman Road, and designate it as a 'Special Landscaped Area'.

Item Question Council Responses
13 Council Response
The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales' guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.

3771.L1//General Thomas, R D 17/07/2013 P S M

Document: Revised LDP, p.75
Policy: General G&T
Summary: Support Gypsy and Traveller allocation in the plan.

Item Question Representation Text
11 Representation
Following revisions to the above Development Plan particularly with regard to the location of the Gypsy and traveller sites, please note that I fully support this revised plan.

Item Question Council Responses
13 Council Response
Support noted.

12/02/2014
Further improvements could be made to the Plan in protecting Langstone Village from further major development by adding the countryside north of the A48 that is outside the boundary settlement, up to an including Old Roman Road, and designing it as a 'Special Landscape Area'.

The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales' guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.
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<td>3772.L1//General</td>
<td>Jeffs, Mrs Karen</td>
<td>18/07/2013</td>
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**Summary:** Support the G&T allocations

**Representation:**

> having been made aware of the revisions to the above plan and in particular reference to the location of the Gypsy and Traveller sites as set out in the plan, is acceptable and approve the Revised Deposit Local Development Plan.

**Council Response:**

Support noted.
Representation Details

Rep'n/Para/Policy: 3772.L2//SP08
Representor: Jeffs, Mrs Karen
Document: Revised LDP, p.22
Policy: SP08
Summary: Extend the SLA to include land north of Langstone.

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Item Question: Representation

However, further improvement could be made to the Plan in protecting Langstone Village from further major development by adding the countryside north of the A48 that is outside of the boundary settlement, up to and including Old Roman Road, and designate it as a 'Special Landscaped Area'.

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Item Question: Council Responses

The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales' guidance.

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### Representation Details

**by:** (No grouping)

**Filtered to show:** (all of) Stage=L; Status=M

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**Document:** Revised LDP, p.75

**Policy:** General G&T

**Summary:** Support for allocation of Gypsy and Traveller sites.

---

**Item Question**  
**Representation Text**

11 Representation

Having been made aware of the revisions to the above plan and in particular reference to the location of the Gypsy and Traveller sites as set out in the plan, I accept and approve of the Revised Deposit Local Development Plan.

---

**Item Question**  
**Council Responses**

13 Council Response

Support noted.
However, further improvement could be made to the plan in protecting Langstone Village from further major development by adding the countryside north of the A48 that is outside of the boundary settlement, up to and including Old Roman Road, and designate it as a 'Special Landscaped Area'.

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**Representation Details**

Rep'n/Para/Policy | Representer | Agent | Accession No | Date Lodged | Late? | Source | Type | Mode | Status | Status Modified
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3774.L1//General | West, A & G | | 18/07/2013 | | | P | S | M | |

Document: Revised LDP, p. 75

Policy: General G&T

Summary: Support the Plan in particular reference to the proposed Gypsy sites

---

**Item Question** | **Representation Text**
--- | ---
11 11 | Having been made aware of the revision to the above plan and in particular reference to the location of the Gypsy and Travellers sites as set out in the plan, is acceptable, and I accept and approve the Revised Deposit Local Development Plan.

---

**Item Question** | **Council Responses**
--- | ---
13 13 | Support noted.
However, further improvement could be made to the plan in protecting Langstone Village from further major development by adding the Countryside north of the A48 that is outside of the boundary settlement, up to and including Old Roman Road, and designate it as a 'Special landscaped Area'.

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Document: Revised LDP, p.76
Policy: H16
Summary: G&T sites at Hartridge Farm Road and Former Allotment sites should be deleted.

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<tbody>
<tr>
<td>7 2</td>
<td>Delete an existing site</td>
</tr>
<tr>
<td>10 10</td>
<td>Soundness Test</td>
</tr>
</tbody>
</table>

Stephens, Mr Clive

The proposed 2 sites for gypsies ie. Hartridge and Ringland allotments if implemented to their full potential, could house approx 45-50 pitches possibly 1000 people? Llanwern village houses approx. 300 people two thirds of which are elderly. This percentage is truly absurd and is definitely big brother attitude to a very small community with very few people to fight against it. Surely is enough to have plans for 1200 new houses etc never mind Gypsies. Llanwern steelworks has only just gone and all the pollution that went with it? Enough is enough.

<table>
<thead>
<tr>
<th>Item Question</th>
<th>Council Responses</th>
</tr>
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<tr>
<td>12 12</td>
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12/02/2014
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</table>

Document: Revised LDP, p.75  
Policy: General G&T  
Summary: Support for Gypsy and Traveller site allocations.

---

**Item Question**  
**Representation Text**

11  
Having been made aware of the revisions to the above plan and in particular reference to the location of the Gypsy and Traveller sites as set out in the plan, is acceptable, and I accept and approve the Revised Deposit Local Development Plan.

---

**Item Question**  
**Council Responses**

13  
Support noted.

---
However, further improvements could be made to the Plan in protecting Langstone Village from further major development by adding the Countryside north of the A48 that is outside of the boundary settlement, up to and including Old Roman Road, and designate it as a 'Special Landscaped Area'.

The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales' guidance.

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Document: Revised LDP, p.75
Policy: General G&T
Summary: Support for Gypsy and Traveller allocations.

**Item Question**

**Representation Text**

**Council Response**

Support noted.

Having been made aware of the revisions to the above plan and in particular reference to the location of the Gypsy and Traveller sites as set out in the plan, is acceptable, and I accept and the approve the Revised Deposit Local Development Plan.
Representation Details

Representation Details

by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M
Rep'n/Para/Policy Representer Agent Accession No Date Lodged Late? Source Type Mode Status Status Modified

3778.L2//SP08 Lambert, Mr Paul

Document:Revised LDP, p.22
Policy: SP08
Map: Proposals East: Proposals Plan - East
Summary: Amend Special Landscape Area to north of Langstone.

---

Item Question Representation Text

11 Representation

However, further improvements could be made to the Plan in protecting Langstone Village from further major development by adding the Countryside north of the A48 that is outside of the boundary settlement, up to and including Old Roman Road, and designate it as a 'Special Landscaped Area'.

---

Item Question Council Responses

13 Council Response

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### Representation Details

**Document:** Revised LDP, p.75  
**Policy:** General G&T  
**Summary:** Support for Gypsy and Traveller sites

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<td>Representation</td>
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<td></td>
<td>Some time ago I wrote to you outlining my objections to parts of the local development plan. Having become aware of revisions to the plan, I now write to voice my support for the plan as revised. In particular I find the location of the Gypsy and Traveller sites, as now set out in the plan, acceptable.</td>
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**Accession No:** 3779.L1/General  
**Agent:** Horleston, Mr Peter G  
**Date Lodged:** 19/07/2013  
**Late:** No  
**Source:** E  
**Type:** S  
**Mode:** M  
**Status:** M
However, further improvements could be made to the Plan in protecting Langstone Village from further major development by adding the Countryside north of the A48 that is outside of the boundary settlement, up to and including Old Roman Road, and designate it as a 'Special Landscaped Area'.

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Document: Revised LDP, p.75
Policy: General G&T
Summary: Support Gypsy and Traveller

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by: (No grouping)

Filtered to show: (all of) Stage=L; Status=M

Rep'n/Para/Policy Representer Agent Accession No Date Lodged Late? Source Type Mode Status Status Modified
3780.L2//SP08 Jeffs, Mr. Darren 18/07/2013 E C M

Document: Revised LDP, p.22
Policy: SP08
Map: Proposals East: Proposals Plan - East
Summary: Amend Special Landscape Area to north of Langstone.

---

11 Representation

However, further improvements could be made to the Plan in protecting Langstone Village from further major development by adding the Countryside north of the A48 that is outside of the boundary settlement, up to and including Old Roman Road, and designate it as a 'Special Landscaped Area'.

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### Representation Details

**Document:** Revised LDP, p.75  
**Policy:** General G&T  
**Summary:** Support the Gypsy and Traveller allocations.

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Support noted.
Representation Details
by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M

Representor: Griffiths, Mr Mark

Document: Revised LDP, p.22
Policy: SP08
Summary: Extend the SLA boundary north of Langstone.

---

**Item Question**
Representation Text

However, further improvement could be made to the Plan in protecting Langstone Village from further development by adding the Countryside north of the A48 that is outside of the boundary settlement, up to and including Old Roman Road, and designate it as a 'Special Landscaped Area'.

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**Item Question**
Council Responses

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**Document:** Revised LDP, p.75  
**Policy:** H15.01  
**Summary:** Delete the G&T site at Celtic Way, Coedkernew, allocate former Ringland Allotments instead.

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<td>7 7</td>
<td>Delete an existing site</td>
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<tr>
<td>10 CE2</td>
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**Representation**  
I would like to see the deletion of the proposed transit traveller site at Celtic Way for the following reasons. I do not believe that the appropriate bodies have considered adequately alternative sites. The Celtic Way site is in appropriate for the following reasons. It is in the middle of a prestigious business area and poses a threat to their security and business image. It is adjacent to an established residential area which has become a safe and pleasant area in which to live. The site is surrounded by open water and a weir dangerous to unsupervised children. This site will damage the good image the Council has worked on for many years with the arrival of the national trust and the economic benefits they bring to the area. The proposed railway station could be under threat if this transit site was positioned in the same area for fear of damage to track and equipment I believe the Council have not looked at the impact on this neighbourhood of the proposed site. I believe that the site of the Ringland allotments would better serve the traveller needs and impact less on local residents. No reason for not choosing this site was forthcoming at the last public meeting.

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<tbody>
<tr>
<td>12 12</td>
<td>Speaking at Public Examination</td>
</tr>
<tr>
<td>2 2</td>
<td>Soundness of LDP</td>
</tr>
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</table>

**Item Question**  
Tick-box reply

12/02/2014
Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

As with any other significant development, the Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.

Development alongside water can enhance the setting of an area. Safety around lakes is something that children from all cultures need to be aware of and is not considered an obstacle to development.

The delivery of the railway station is not considered under threat as a result of the proposed transit site.
### Representation Details

**by:** (No grouping)  
**Filtered to show:** (all of) Stage=L; Status=M  
**Rep'n/Para/Policy** | **Reprsentor** | **Agent** | **Accession No** | **Date Lodged** | **Late?** | **Source** | **Type** | **Mode** | **Status** | **Status Modified**  
--- | --- | --- | --- | --- | --- | --- | --- | --- | --- | ---  
3784.L1/H15.01 | Weller, Mr Keith | | | 19/07/2013 | O M | | | | |  

**Document:** Revised LDP, p.75  
**Policy:** H15.01  
**Summary:** Object to the G&T site at Celtic Way, Coedkernew.

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<tbody>
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<td>New Policy</td>
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<td>Delete an existing site</td>
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<td>10</td>
<td>Soundness Test</td>
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**Item Question** | **Representation Text**  
--- | ---  
11 | Representation | I would like the site at Celtic Way deleted from the plan. It is too near to high profiles sites Tredegar House and Commercial premises that promote Newport in a favourable light. The site has open water hazards it also is adjacent to open land which will make containment impossible. Little regard has been shown for the residents or businesses of an improving area of Newport. This site would damage the prospects of further quality business and residential development. As with mineral arrangements with Monmouthshire. Could Newport not liaise with a neighbouring authority to share its commitment to satisfy National policy. |

---

**Item Question** | **Tick-box reply**  
--- | ---  
2 | Soundness of LDP | No |

---

**Item Question** | **Council Responses**  
--- | ---  
13 | Council Response | It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.  

Development alongside water can enhance the setting of an area. Safety around lakes is something that children from all cultures need to be aware of and is not considered an obstacle to development.  

Newport does work closely with its neighbouring authorities, but ultimately, Newport has a proven need for a transit site and therefore Newport must address this need. |
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<tr>
<th>Document</th>
<th>Revised LDP, p.75</th>
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<tbody>
<tr>
<td>Policy</td>
<td>General G&amp;T</td>
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<tr>
<td>Summary</td>
<td>Support the Gypsy and Traveller site allocations.</td>
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**Item Question**

**Representation Text**

Having been made aware of the revisions to the above plan and in particular reference to the location of the Gypsy and Traveller sites as set out in the plan, I accept and approve the Revised Deposit Local Development Plan.

**Council Responses**

Support noted.
However, I believe further improvement could be made to the Plan in protecting Langstone Village from further major development by adding the Countryside north of the A48 that is outside of the boundary settlement up to and including Old Roman Road, and designate it as a "Special Landscaped Area".

The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales' guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.
Document: Revised LDP, p. 75
Policy: H15.01
Summary: Object to the G&T site allocation at Celtic Way, Coedkernew.

<table>
<thead>
<tr>
<th>Item Question</th>
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<tbody>
<tr>
<td>11</td>
<td>I object to the siting of a Gypsy Traveller transit site at land off Celtic Way Newport. It is sited adjacent to ponds and reens which would prove a hazard to any children, there are also several electrical sub stations nearby which could also prove hazardous to children. The proximity to the housing at Celtic Horizon is a concern. The estate is bounded by footpaths which could be easily accessed from this transit site. It would be very easy for travellers to gain access to the houses via these footpaths to steal from both gardens and houses. When the estate was first developed we were continually 'buzzed' by the police helicopter chasing youngsters along these back footpaths and lanes using them as a retreat where no police car could follow. I would like to see this plan deleted as it is unsuitable for a transit camp.</td>
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<thead>
<tr>
<th>Item Question</th>
<th>Council Responses</th>
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<tbody>
<tr>
<td>13</td>
<td>Development alongside water can enhance the setting of an area. Safety around lakes is something that children from all cultures need to be aware of and is not considered an obstacle to development. As with any other significant development, the Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly. The substation is secure.</td>
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### Representation Details

**by:** (No grouping)  
**Filtered to show:** (all of) Stage=L; Status=M

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<td>O</td>
<td>S</td>
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**Document:** Revised LDP, p.75  
**Policy:** General G&T  
**Summary:** Support Gypsy and Traveller allocations.

#### Item Question  
**Representation Text**

11  11  
In response to the revised Development Plan and in particular the location of the Gypsy and Traveller Sites I after much consideration agree that the proposed locations approved.

#### Item Question  
**Council Responses**

13  13  
Support noted.

---

### Representation Details

**by:** (No grouping)  
**Filtered to show:** (all of) Stage=L; Status=M

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**Document:** Revised LDP, p.22  
**Policy:** SP08  
**Summary:** SLA Boundary north of Langstone should be extended.

#### Item Question  
**Representation Text**

11  11  
However further improvement could be made to the plan in protecting Langstone Village from further major development by adding the countryside north of the A48 that is outside the boundary settlement, up to and including Old Roman Road and designate it as a "Special Landscaped Area".

#### Item Question  
**Council Responses**

13  13  
The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales’ guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.
### Representation Details

**Document:** Revised LDP, p.75  
**Policy:** General G&T  
**Summary:** Support the Gypsy and Traveller allocations.

<table>
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<tr>
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### Council Responses

13  
Support noted.

### Representation Details

**Document:** Revised LDP, p.22  
**Policy:** SP08  
**Summary:** SLA boundary should be extended north of Langstone.

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### Council Responses

13  
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<td>3789.L1/H15.01</td>
<td>Smith, P &amp; D J</td>
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**Document:** Revised LDP, p.75  
**Policy:** H15.01  
**Summary:** Object to the G&T site allocation at Celtic Way, Coedkernew.

### Item Question  
**Representation Text**

We attended the public meeting in the Council on the 17th July 2013 at the Civic Centre and wish to reiterate the points which we made at the meeting in opposition to the proposed gypsy site at Coedkernew.

We purchased a two bed link Barrett house from plan in October 2006 as a buy to let (this is one of two properties which we have invested in locally; not because we are well off financially but because my husband's pensions in the past have been pillfered, and we were hoping that the investments would contribute to our pension plan rather than having to be reliant on the state). The reason that we chose Duffryn was that we perceived the area to be up and coming as there was a great deal of business investment taking place together with the building of multiple private estates. Also the property was in close to proximity to an excellent school (St Josephs), a supermarket and good public transport. The location up until the present time has also been very tranquil and a pleasant environment in which to reside being near to open countryside. However, the day after taking ownership of the property we found that one of our newly planted very large tubs had disappeared B tracks could be seen across the stones in our back garden, the tub had been dragged away (it was for too heavyto carry). I reported the incident to the Barrett site manager and was advised that gypsies had set up camp nearby and during the course of the night had cleared the site of all plants belonging to Barretts both inside the estate and on the roadside plus residents hanging baskets had also disappeared. Barretts portable generators and building materials was also taken at the same time. The thefts were reported to the police but they did not want to know and nothing was done.

Our tenants have already indicated to our Management company that they will not be renewing their tenancy agreement again as they do not wish to live near gypsies. Our Management company have also advised us that tenants currently residing on the Celtic Horizons site have indicated likewise. If the site goes ahead our property will be worthless as we will be unable to sell or let the house. If the gypsy site goes ahead we would like compensation for our loss or for the Council to purchase the property at the current market value.

### Council Response

The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.

As with any other significant development, the Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.
Document: Revised LDP, p.75
Policy: General G&T
Summary: Support allocation of Gypsy and Traveller sites in the LDP.

Having been made aware of the revisions to the above plan and in particular reference to the location of the Gypsy and Traveller sites as set out in the plan, is acceptable, and I accept and approve the Revised Deposit Local Development Plan.

Support noted.
However, further improvements could be made to the Plan in protecting Langstone Village from further major development by adding the Countryside north of the A48 that is outside of the boundary settlement, up to and including Old Roman Road, and designate it as a ‘Special Landscaped Area’.

Council Response

The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales’ guidance.

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Representation Details

Newport City Council Local Development Plan

by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M

Rep'n/Para/Policy Representer Agent Accession No Date Lodged Late? Source Type Mode Status Status Modified
3791.L1//H16.01 Steed, A 22/07/2013 O M Document:Revised LDP, p.76
Map: Proposals East: Proposals Plan - East
Policy: H16.01 Summary: Wants Hartridge Farm Road site deleted.

11 11 Representation
The last thing Newport City needs is a Gypsy and Traveller site it will cause nothing but trouble I as a tax payer do not want it on my door step what Newport City does need is a Welsh medium school which I think has been promised for many years put a new school on the Hartridge site do something good for once give Newport what it needs not what you think it needs

13 13 Council Response
The Council has a duty to identify the need for gypsy and traveller sites, and to find sufficient land to meet the land. Alternative uses, including a school, for the allocated gypsy and traveller site have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

3791.L2//CF13 Steed, A 22/07/2013 P C M Document:Revised LDP, p.113
Map: Proposals East: Proposals Plan - East
Policy: CF13 Summary: Use of Hartridge Farm Road site as Welsh medium school site.

11 11 Representation
The last thing Newport City needs is a Gypsy and Traveller site it will cause nothing but trouble I as a tax payer do not want it on my door step what Newport City does need is a Welsh medium school which I think has been promised for many years put a new school on the Hartridge site do something good for once give Newport what it needs not what you think it needs

13 13 Council Response
The LDP allocates sufficient sites to meet the need for additional and enhanced school facilities to meet future educational needs, including Welsh medium education.
### Representation Details

Document: Revised LDP, p. 75
Policy: General G&T
Summary: Support Gypsy and Traveller site allocations in the LDP.

<table>
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12/02/2014
Representation Details

3792.L2//SP08

Representee: Darney, Mr Peter

Policy: SP08

Map: Proposals East: Proposals Plan - East

Summary: Extend Special Landscape Area to north of Langstone

Item Question  Representation Text

11  Representation

However, further improvements could be made to the Plan in protecting Langstone Village from further major development by adding the Countryside north of the A48 that is outside of the boundary settlement, up to and including Old Roman Road, and designate it as a 'Special Landscaped Area'.

Item Question  Council Responses

13  Council Response

The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales' guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.
## Representation Details

**by:** (No grouping)  
**Filtered to show:** (all of) Stage=L; Status=M

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**Document:** Revised LDP, p.76  
**Policy:** H16.01  
**Summary:** Object to the proposed Gypsy and Traveller site at Hartridge Farm Road

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<td>Delete an existing site</td>
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<td>10</td>
<td>Soundness Test</td>
<td>P1, C1, C4, CE1, CE2</td>
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On behalf of the Governing Body of Llawern High School I write to register our opposition to the above referred Gypsy and Traveller Site proposals.

Our objections are summarised as follows:

1. **Size** – The proposed size of the Hartridge Farm Road site is outside the Welsh Assembly Government’s Guidelines and Good Practice. The site is intended to have up to 43 pitches with each pitch having up to 3 to 4 caravans. This will make this site not only the largest in Britain but the largest in Europe. A site of this scale will not encourage the integration of travellers within the community and has the potential to have the opposite effect. This would be detrimental to the improving school/community links programme and may lead to costly damage to the new Llanwern High School in terms of physical damage, reputation and image of the school plus an impact on attendance, behaviour and attainment measures at the school.

2. **Layout** – The proposed Hartridge Farm Road site layout (ie a single large area split into three sites) is contrary to the Welsh Assembly Government’s Guidelines and Good Practice. Such communal sites are likely to promote conflict within families which may extend out to the local community again causing a negative impact on the school.

3. **Location** – We believe that by locating the gypsy and traveller sites close to the new, emerging school which is currently striving to make significant improvements in the behaviour, attendance and achievement of pupils will undermine the Council’s strategy to improve education in the east of the city. The location of the site is regarded by the Travellers themselves as unsuitable as they have concerns regarding being too close to schools with regard to conflict. Their preference is to be more remote. We believe that further consideration should be given other sites such as the former speedway site, and similar, which were previously nominated by both travellers and non-travellers alike, and to those sites identified in the existing Local Development Plan as being more favourable.

4. **Access Safety** – The Hartridge Farm Road site has restricted access along a lane adjacent to two schools. The schools attract a tremendous amount of traffic not only a peak times at the start and end of the school day but also during the hourly transfer of pupils between the collaborating secondary schools in the East of the City and during the evenings and weekends when Llanwern High School is significantly (and increasingly) used for community activities. Any additional traffic (including heavy vehicles, trailers etc) on the road will increase the risk to pedestrian and particularly children’s safety. Equally much of this road has no footpaths, no street lighting and the road narrows to just 15 feet in places. The road leading up to the site is in poor condition and barely suits its current needs. This is a significant health and safety issue with the road requiring extensive and costly refurbishment in order to bring it up to a safe standard. The Policy Review Group has already identified and recorded vehicle access issues for the site.

5. **Potential Danger Caused by Animals** – Llanwern High School has a “duty of care” to anyone that is on the school site. It is well known that many traveller families keep a stock of dogs, ponies and horses and there are many documented examples of these animals escaping their confines. An animal of this nature running out and wandering through the Llanwern High School site will undoubtedly cause issues for pupil, staff and visitor safety.

6. **Process/Risk Assessment** – We believe that for the “process” to be accurate and correct a thorough risk assessment of the impact of the Gypsy and Traveller Sites at Hartridge Farm Road and Ringland Allotment Sites on Llanwern High School should have been completed. We are not aware that such an assessment has been executed since we have not been involved or consulted during the assessment or outcome. Thus the process we believe is incomplete in its assessment of the sites. If this risk assessment has been completed we would welcome a copy of the document in order to review and comment upon its assessment outcome.

In conclusion, therefore, the Governors of Llanwern High School believe that the siting of Gypsy and Traveller Sites at the Hartridge Farm Road and Ringland Allotment locations is unsuitable and that the process of developing the Revised Deposit Newport Local Development Plan 2011 – 2026 is not sound.
13 13 Council Response

It is acknowledged that the size of the Hartridge Farm Road site is larger than Welsh Government guidance suggests; however, this will avoid the need to split any of the individual families, which is an important factor for the families themselves. The site, which would contain fewer pitches than Shirenewton in Cardiff, would not be the largest site in the United Kingdom, let alone Europe. The size is sufficient to accommodate all 3 families, which would meet Newport's residential need for Gypsy/Traveller provision. The proposed layout would use screening to effectively create 3 independent sites within the curtilage of the whole site. The site would also be screened from the road and nearby residential properties.

The site is within the settlement boundary and considered to be a sustainable location. Remote locations outside of the settlement boundary have poorer access to amenities and place more of an emphasis of car travel, therefore deemed to be more unsustainable. Site design can ensure it is well screened from the nearby RSPCA Centre and Llanwern High School.

It is acknowledged that the Hartridge Farm Road site will require improvements to the access road including the provision of a length of pavement. This will be agreed as part of a planning application and is not considered insurmountable.

The Council has a duty to provide accommodation for the gypsy/traveller population. We do not have a duty to provide land for horses. The site will be owned and managed by the Council and there is no intention to allow the occupants to keep horses on site.

The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.
On behalf of the Governing Body of Llanwern High School I write to register our opposition to the above referred Gypsy and Traveller Site proposals.

Our objections are summarised as follows:

1. Size – The proposed size of the Hartridge Farm Road site is outside the Welsh Assembly Government’s Guidelines and Good Practice. The site is intended to have up to 43 pitches with each pitch having up to 3 to 4 caravans. This will make this site not only the largest in Britain but the largest in Europe. A site of this scale will not encourage the integration of travellers within the community and has the potential to have the opposite effect. This would be detrimental to the improving school/community links programme and may lead to costly damage to the new Llanwern High School in terms of physical damage, reputation and image of the school plus an impact on attendance, behaviour and attainment measures at the school.

2. Layout – The proposed Hartridge Farm Road site layout (ie a single large area split into three sites) is contrary to the Welsh Assembly Government’s Guidelines and Good Practice. Such communal sites are likely to promote conflict within families which may extend out to the local community again causing a negative impact on the school.

3. Location – We believe that by locating the gypsy and traveller sites close to the new, emerging school which is currently striving to make significant improvements in the behaviour, attendance and achievement of pupils will undermine the Council’s strategy to improve education in the east of the city. The location of the site is regarded by the Travellers themselves as unsuitable as they have concerns regarding being too close to schools with regard to conflict. Their preference is to be more remote. We believe that further consideration should be given other sites such as the former speedway site, and similar, which were previously nominated by both travellers and non-travellers alike, and to those sites identified in the existing Local Development Plan as being more favourable. The revised version of the plan does not give due consideration to the alternative sites available, nor does it provide sustainable reasons for rejecting those previously preferred.

4. Access Safety – The Hartridge Farm Road site has restricted access along a lane adjacent to two schools. The schools attract a tremendous amount of traffic not only at peak times at the start and end of the school day but also during the hourly transfer of pupils between the collaborating secondary schools in the East of the City and during the evenings and weekends when Llanwern High School is significantly (and increasingly) used for community activities. Any additional traffic (including heavy vehicles, trailers etc) on the road will increase the risk to pedestrian and particularly children’s safety. Equally much of this road has no footpaths, no street lighting and the road narrows to just 15 feet in places. The road leading up to the site is in poor condition and barely suits its current needs. This is a significant health and safety issue with the road requiring extensive and costly refurbishment in order to bring it up to a safe standard. The Policy Review Group has already identified and recorded vehicle access issues for the site.

5. Potential Danger Caused by Animals – Llanwern High School has a “duty of care” to anyone that is on the school site. It is well known that many traveller families keep a stock of dogs, ponies and horses and there are many documented examples of these animals escaping their confines. An animal of this nature running out and wandering through the Llanwern High School site will undoubtedly cause issues for pupil, staff and visitor safety.

6. Process/Risk Assessment – We believe that for the “process” to be accurate and correct a thorough risk assessment of the impact of the Gypsy and Traveller Sites at Hartridge Farm Road and Ringland Allotment Sites on Llanwern High School should have been completed. We are not aware that such an assessment has been executed since we have not been involved or consulted during the assessment or outcome. Thus the process we believe is incomplete in its assessment of the sites. If this risk assessment has been completed we would welcome a copy of the document in order to review and comment upon its assessment outcome.

In conclusion, therefore, the Governors of Llanwern High School believe that the siting of Gypsy and Traveller Sites at the Hartridge Farm Road and Ringland Allotment locations is unsuitable and that the process of developing the Revised Deposit Newport Local Development Plan 2011 – 2026 is not sound.
Health Issues and Pylons - No concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

Location - The site is adjacent to the settlement boundary and considered to be a reasonably sustainable location. More remote locations that are further outside of the settlement boundary have poorer access to amenities and place more of an emphasis on car travel, therefore deemed to be more unsustainable.

Land Presentation - Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development. The results of these surveys have confirmed that some ground re-profiling works will be required at the Former Ringland Allotments. This work will add to the development costs but is not considered to be insurmountable.

Access – Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

Existing Use – There are no allotments on the site. Alternative allotment provision can be investigated if it is demonstrated there is insufficient allotment provision across Newport as a whole.

Aspect – A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

Highway Safety - Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

Environmental – The Council Strategy is a Brownfield led strategy and preference is given to sites which are previously developed. A number of greenfield sites are within the Plan as they are considered appropriate and well located for development. This is why this site is included.

Amenities - It is agreed that the locking of the underpass is something that needs to be avoided in order to ensure access to local amenities.

Flooding – Flood risk at this site is not considered to be a significant risk.

Financial Implications – The Council is aware of the potential financial implications of going ahead with the site. Gallagher Estates have planning permission for their major development in close proximity to the site and although they have submitted representations of concern, they are currently continuing to submit information to enable them to discharge planning conditions and get on site and build.

Privacy and Noise - A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

Potential danger caused by animals - The Council has a duty to provide accommodation for the Gypsy/Traveller population. We do not have a duty to provide land for horses. The site will be owned by the Council and there is no intention to allow the occupants to keep horses on site.

The Process – The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.

As with any other significant development, the Council has liaised with the police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the police if any incidents of crime that relate to the site are reported.

Alternative Sites – Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.
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**Newport City Council Local Development Plan**

**Representation Details**

by:  (No grouping)

Filtered to show:  (all of) Stage=L; Status=M
### Document: Revised LDP, p.75

**Policy:** H15.01  
**Summary:** Delete the G&T site at Celtic Way, Coedkernew from the Revised Deposit Plan.

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<tr>
<th>Rep'n/Para/Policy</th>
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<tbody>
<tr>
<td>3794.L1/H15.01</td>
<td>Miss Tammy Lloyd, Mr David Gould &amp;</td>
<td>22/07/2013</td>
<td>P</td>
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**Item Question**  
**Representation Text**
I am writing to you as my Council in order to vehemently raise my objections to the planned Gypsy transit site at Celtic Way, Coedkernew. It would appear that Newport Council have autocratically made the decision to allocate this land following approval from members of the travelling community which strongly suggests that meetings have been taking place with the travelling community on order that their preferences could be obtained. I understand that the approximate cost to the tax payers of Newport for both this transit site as well as the planned one at Hartridge is expected to be in the region of £6.3 million pounds. This money would be better spent for the general benefit of the law abiding tax payers of Newport by repairing the roads, improving services such as buses and housing developments rather than to provide areas where the less law abiding non-tax paying riff raff of society can live.

If these so called travellers choose to live the life which the sheer nature of the title by which they call themselves then by nature they should "travel" and not choose to remain in one static place. This by definition would therefore be a mockery. The council in its wisdom has clearly not taken into account that having these sort of people living close to factory units would detract other companies ever coming to this area to invest not to mention the detrimental effect that a gypsy site would have upon the value of homes in this area. Maybe the "travellers" chose this site at Celtic Way as it is by nature close to factory units from where things can be stolen. The housing estate can be reached just as easily and clearly many thefts and anti social situations are highly likely to occur as a result were this proposal to go ahead.

The fact that very little publicity has been given to Newport Councils plans concerning the areas set aside for Gypsy sites indicates that there is some kind of cover up emanating which must be addressed. When plans were proposed for Marshfield and St Mellons to have gypsy sites, there was so much publicity on the matter, it came as no surprise that the residents won their case - such was the strong feeling opposing these sites. It seems that Newport have learned some lessons from this and have adopted a "say nothing 10 approach to the very people its councillors have been elected to serve, and whose money it freely wastes on such schemes as this.

I accept that the Welsh Assembly has directed that both static and transit sites must be found in this area. My question is Why are Newport Council taking into consideration the needs and requirements of the travelling community and NOT those people directly affected by these proposals? There is plenty of space in this area which the travelling community do not want to be placed in - why does their expensive residential areas, house prices will reduce and as a result, the revenue from the council tax being paid by its residents when their properties are all revalued because of this effect.

The development plan in my opinion is therefore flawed for the following reasons.

1. Inward investment by businesses is highly unlikely to proceed if this transit site goes ahead. Many of the current existing businesses in situ such as Quinns Radiators etc have made it clear that they will not now expand and may even pull out altogether.

2. By placing a permanent residential site in Hartridge and a permanent TRANSIT site in Celtic Horizon, further investment by industry or housing developers is unlikely to occur as no one wants to live anywhere near he travelling community.

3. A prestigious development for homes and business which is probably amongst one of he very few good areas left in Newport has now the potential of being turned into a ghetto type environment which will UNDOUBTEDLY EXPAND. This seems in direct contradiction to the Development being encouraged by the council.

4. Alternative contingency sites are readily available - that should be used as an alternative thereby maintaining a sound and logical solution as well as maintaining the ability to attract industry and development to the city and to protect jobs.

5. I am sure that the proposed train station for Coedkernew will not take place once Arriva Trains Wales and First Great Western realise that close proximity that this station will be to the proposed Gypsy/Transit Site. - This again negates any potential development.

6. Whilst the welsh Assembly has autocratically dictated that all cities must provide both permanent and transit sites - why not challenge this? The overall benefit of development should after all be for the majority of law abiding citizens within Newport and not for the less savoury elements of society such as gypsies whether this mantle is deserved or not.

I would strongly request that these proposals be reviewed and the Celtic Horizon site deleted from the councils plans for the reasons put forward. I also request that the Scrutiny Committee also review this plan and visit and witness for themselves how both sites currently in existence at Shire Newton and Rover Way in Cardiff have both expanded beyond all previous anicipations.
The Council is aware of the potential financial implications of going ahead with the sites. Newport City Council has an immediate need for permanent residential pitches in Newport. Some gypsy/travellers, for various reasons, live in one place for longer periods of time.

With regard to Celtic Way, this site will be transit site and use by gypsy/travellers passing through the area. It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptably.

The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.

As with any other significant development, the Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.

It is considered that the 6 week consultation process was sound. The proposals and consultation opportunities were advertised in the South Wales Argus, along with Newport Matters which is delivered to every home in Newport. All Community Councils were informed of the consultation, including Coedkernew. In addition, the consultation was advertised on the Council's website and thousands of letters were sent out to stakeholders and members of the public. It is acknowledged that there was a fault with Newport City Council's website during the weekend of 20/21 July. As a result, the Council took the reasonable step of extended the consultation for a further weekend.

It is not considered that the delivery of the proposed railway station at Coedkernew is under threat as a result of the transit site.
Further improvement could, I feel, be made to the plan by designating the countryside north of the A48 that is outside the settlement boundary, up to and including the Old Roman Road, as a Special Landscape Area. This would have the effect of protecting Langstone village from further major development.

The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales’ guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.

To clarify, the designation of a site as Special Landscape Area does not preclude development but would require developers to design and manage the areas appropriately.
Having been made aware of the revisions to the above plan and in particular reference to the location of the Gypsy and Traveller sites as set out in the plan, is acceptable, and I accept and approve the Revised Deposit Local Development Plan.

Support noted.
### Representation Details

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<th>Document:Revised LDP, p.22</th>
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<tr>
<td>Policy: SP08</td>
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<tr>
<td>Summary: Proposed amendment to Special Landscape Area in Langstone</td>
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<tr>
<th>Item Question</th>
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<tr>
<td>11 Representation</td>
<td>However, further improvement could be made ot the Plan in protecting Langstone Village from further major development by adding the Countryside north of the A48 that is outside the boundary settlement up to and including Old Roman Road, and designate it as a 'Special Landscaped Area.'</td>
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<td>Asda Stores Ltd</td>
<td>RPS Group PLC</td>
<td>22/07/2013</td>
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**Document:** Revised LDP, p.95  
**Policy:** R06  
**Map:** Inset 21: Commercial Road District Centre  
**Summary:** Proposed amendment to the Commercial Road District Shopping Centre

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#### Item Question  
**Representation Text**

6. Amend the boundaries of an existing site  
Proposals PlanWest, June 2013  
Inset 21 Commercial Road, District Centre  

- **Soundness Test**  
  - C1, CE1, CE2, CE4  

---

10. Soundness Test  
C1, CE1, CE2, CE4

---

11. Representation  
The existing boundary for the Commercial Road District Centre, as identified in the adopted UDP for Newport, includes the existing Asda store and its car park. However, the far eastern corner of the car park is now shown outside the district-centre boundary on the Revised Deposit Draft LDP Inset Map 21 and Proposals Map West.

Paragraph 9.6 of the District Centres Background Paper (June 2013) states that "The most eastern part of the Cattle Market site is undeveloped but has planning permission for a hotel. The hotel relates more to Lower Dock Street and one of the important considerations in its redevelopment is the relationship to Local Dock Street frontage. The site does not form part of the functioning part of the Commercial Road District Centre, For these reasons it is proposed to remove the hotel allocation site from the District Centre boundary." Paragraph 9.8 goes on to recommend amending the boundary to exclude the hotel application site to allow for a more flexible approach to the redevelopment options. My client, Asda Store Ltd, wishes to object to this change and consider that the new red line boundary for the Commercial Road District Centre should remain as shown in the adopted UDP for the reasons set out below:

1. Firstly the LDP Background paper is incorrect in its statement that the part of the site proposed to be excluded from the District Centre boundary is undeveloped. The site forms part of the car park for the Asda Store. Given that Asda is a key anchor store for the District Centre it is illogical to remove part of the site from the District Centre boundary.

2. The Council acknowledges that the site in question has extant planning permission for a hotel. National planning policy recognises that hotels are a town centre use and therefore again there is no logic in seeking to detach it from the District Centre.

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12. Speaking at Public Examination  
It would be beneficial for the Inspector to consider the matter in detail at an examination.

---

**Item Question**  
**Tick-box reply**

2. Soundness of LDP  
No

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12/02/2014
The Commercial Road District Centre boundary was originally drawn in the Deposit LDP to reflect the extent of planning permission granted for the Asda supermarket (05/1268). The hotel element of the scheme was allocated as a Regeneration Site under EM2(iv) of the Deposit LDP to offer flexibility in the proposed uses that could be considered on the site. As part of the preparation of the Revised Deposit Plan an assessment of Employment and Regeneration allocations was undertaken as part of the Economic Land Review. The EM2(iv) allocation was removed due to its small size.

The site is considered to relate more to Lower Dock Street than Commercial Road and this relationship will be a critical consideration in the assessment of any future proposals. Commercial Road is the focus of the District Centre allocation and the primary role of this site is considered to be its relationship to Lower Dock Street and not Commercial Road.
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<td>3798.L1/H16.01</td>
<td>Harrison, Mrs A D</td>
<td>22/07/2013</td>
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Document: Revised LDP, p.76
Policy: H16.01
Summary: Object to the proposed Gypsy and Traveller sites at Hartridge Farm Road and Ringland Allotments

Additional material submitted - Please click here
**Representations Details**

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<tr>
<td>11 11 Representation</td>
<td>I am extremely annoyed and upset that the council has chosen to build a Gypsy and Traveller site at Hartridge Farm Road Newport.</td>
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<td>I live quite near to this site and I wish to register my protest against the site.</td>
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<td>I have numerous points/questions about the proposed site which I would like answered.</td>
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<td>I have been given to understand that this land was ear marked for development and if sold could have earned the council between 5 and 6 million pounds which will not now happen if the site goes ahead.</td>
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<td>I also understand that to build this site a pylon will have to be moved and the land levelled at a cost of at least 1 million pounds who is providing the money for this.</td>
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<td>Why is it being sited so close to two schools, surely this is not an ideal situation? I am not suggesting anything untoward, but have recently read and heard about abductions by travellers/gypsies.</td>
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<td>One of the schools is a brand new school built to raise the profile of the area and I understand this is being achieved at present. But this site being so close could persuade parents rightly or wrongly not to send their children to this school.</td>
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<td>I have noticed that a new multi-functional building is being erected in Newport Town Centre to raise the profile of Newport and encourage visitors to Newport and to think of it as a thriving city, but having this site in Newport is counter productive to putting Newport back on the map as specially as this site is clearly visible from the SDR road and the railway line.</td>
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<td>This area houses the Rspca kennels and I understand that there is also cause for concern.</td>
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<td>As a Member of Llanwern Golf club and a committee member there has been cause for concern as to possible misuse of the public footpath which runs through the course and is easily accessible from Hartridge Farm Road.</td>
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<td>We regularly suffer with people coming into the course when the golfers have gone home, mutilating the greens and having parties on the course (bottles and cans found on the course) also there have been incidents of horses on the course which have escaped from the neighbouring fields, (which we were given to believe were gypsy horses which we being kept in a farmers field). What if this were to happen and they are found to be the property of dwellers at the site what action would the council take then. Who will be held liable for any damage which should arise from building this site?</td>
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<td>The most important question I raise is how much is this site going to cost the ratepayer of Newport for as we know rates increase every year. Will the upkeep and cost of this site be passed onto the ratepayers and can we expect substantial increases in our rates in the future.</td>
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<td>I thought that Councils were under an obligation to provide Value For Money, surely if the cost or part of the cost is to be passed on to the rate payers this is not Value For Money.</td>
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<td>Will the residents who are next to the site be getting a decrease in their rates as rightly or wrongly this site could devalue the properties?</td>
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<td>There were objections to a Gypsy/Travellers site at Bettws, Langstone and Nash the objections were heard and acted on why must we the residents of the surrounding area have this site foisted on us where is our human rights to object and be listened to as I have noticed that there is already work going on at one of the proposed sites.</td>
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<td>I have enclosed two protest letters signed and dated for your consideration.</td>
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<td>Please note that I intend to send a copy of this letter to Carwyn Jones the First Minister for Wales, David Cameron the Prime Minister, and the Sun Newspaper as from the reports I have had back from people who have attended meetings where a council representative has been present we are not being heard or listened to.</td>
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I would also like to add my protest against the proposed site at Ringland Allotments. Why do we need two sites less than a mile apart and on the same road?

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### Council Response

Objection noted. The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.
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Document: Revised LDP, p.76
Policy: H16.01
Summary: Object to proposed Gypsy and Traveller site at Hartridge Farm Road.

---

**Item Question**

**Representation Text**
I the undersigned wish to register my objection to the Gypsy and Traveller site proposed at Hartridge Farm Road and Ringland Allotments.

My reasons are summarised as follows:

Size – The proposed size of the site is unimaginable and is far outside the Welsh Assembly Government’s Guidelines and Good Practice. The site is intended to have up to 43 pitches with each pitch having up to 3 to 4 caravans. This will make this site not just the biggest in Britain by the biggest in Europe. Such a development will not be in the interest of Newport itself. Further a site of this scale will not encourage the integration of travellers within the community but I likely to have the opposite effect. Therefore the proposal itself is inconceivable.

Layout – The proposed layout is contrary to the good faith of the Welsh Assembly Government’s Guidelines and Good Practice. To take a single large site and split it into three sites to house all three families flagrantly contravenes the guidelines and will dominate the immediate small community. It is also unfair to the travellers as they do not want communal sites as it will promote conflict within the families as well as likely to infringe the human rights of both the travellers and the immediate communities alike.

Location – This site is not suitable and other sites are more suitable. The location of the site is regarded by the Travellers themselves as unsuitable as they have justifiable concerns being too close to Llanwern High School with regard to conflict. Their preference is to be more remote. Further consideration should be given other sites such as the former speedway site, and similar, that have previously been nominated by both travellers and non-travellers alike, and to those sites identified in the existing Local Development Plan as being more favourable, The revised version of the plan does not give due consideration to the alternative sites available, nor does it provide sustainable reasons for rejecting those previously preferred.

In the revised draft plan, the Council have favoured sites to the east of Newport as the preferred locations. Travellers have expressed no such preference and are more concerned that selections should be based on the suitability of each individual site.

Current use – The Road Safety Centre is the focal point of contact for all road safety education, training and publicity service in Newport and surrounding area. To lose this facility would be a great loss to Newport as some courses in particular develop an understanding of behaviour and attitude and build confidence in the students (especially those of low attainment) themselves and many go on to a career in motor maintenance and the like from the experience and knowledge they have gained. Further, the Centre is within walking distance for the Llanwern High School pupils.

Proximity to Sewage Pumping Station – This site is located within a close proximity to a sewage pumping station. There may be health implications linked to the airborne particles produced by these stations.

Access – This site has restricted access along a lane adjacent to two schools. The schools attract a tremendous amount of traffic at peak times while Hartridge Farm Road alongside the houses there are no footpaths, no street lighting and the road narrows to just 15 feet. The road leading up to the site is in poor condition and barely suits its current needs. This would need extensive and costly refurbishment. The Policy Review Group has already identified and recorded vehicle access issues for the triangular site but is now choosing to ignore it.

Llanwern High School – Because of parents’ perception of traveller sites, rightly or wrongly, it would undermine the Council’s strategy of improving education in the east of the city. (Prior to the building of the new High School parents were reluctant to send their children to the old Hartridge School, choosing St Julian’s, Caerleon, Caldicot or Chepstow Schools instead). The remarkable transformation of the new building and the look, attitude and pride of the pupils has changed that. However, all the good work put into the new school could be undermined and the impressive new Llanwern High School could become a very expensive, underused, facility.

Ysgol Gymraeg Casnewydd – Again because of parents’ perception of traveller sites, rightly or wrongly, parents are likely to reconsider their choice of school for their children. This would undermine further the already fragile financial position of the school thus deterring future needed investment.

Financial Matters – The Council’s financial strategy will also be undermined because the proposed site is designated for building and the capital receipts used to offset the cost of the new Llanwern School and so reduce the Council’s debt.

RSPCA Centre – For years the RSPCA Centre and the residents have co-existed amicably. The dogs are rarely noisy, unless they are disturbed. They would be constantly disturbed if there was a traveller site next door. This would result in stressed animals and residents, including the travellers themselves. RSPCA staff and volunteers daily exercise the dogs but say they could not risk walking their nervous, abandoned charges passed a traveller site.
Land Presentation – The topography of this site, as it stands, is not totally suitable for the proposed use. Again the Policy Review Group has already identified and recorded that the topography of the triangular site is unsuitable but is now choosing to ignore it.

Amenities – Access to local amenities is via an underpass to Ringland. This underpass has in the past been often locked due to safety and antisocial behaviour issues. Such issues are likely to be considerably exacerbated by the proposed development thus putting travellers and their families at risk. The Travellers themselves have also expressed concerns.

Noise – As the site is adjacent the busy main railway line there will be noise problems that will be a particular issue for caravans. A noise attenuation fence is proposed here but due to the level of noise will be of little effect.

Potential danger caused by animals – it is well know that many traveller families may keep a stock of ponies and horses now or in the future. There are many well documented examples of these animals escaping their confines. An animal of this nature running out onto the Railway, SDR or found wandering through the adjacent Schools or neighbouring Ringland Estate or Llanwen Village will undoubtedly cause issues and even cost lives in the case of the Railway or SDR.

Aspect – The site will be highly visible from the busy mainline railway and would potentially create a poor image of Newport.

The Process – The Scrutiny Report dated 29th October, 2012 and, consequently, accepted by Cabinet on 12th November 2012 is inconsistent, biased, is incomplete in its assessments made and offers no analytical evidence of the preferences made for the selection of travellers sites as claimed. The Policy Review Group recommendations display a lack of understanding of the Travellers needs which was further reinforced by a member of the Policy Review Group during Full Council on 4th June 2013 displaying a serious lack of understanding of what constitutes a Travellers Site thus casting further, serious, doubt on the integrity of the aforementioned report they produced.

In conclusion this site is neither suitable for the provision of traveller site. Further the integrity of the Policy Review Group’s Report, recommendations and conclusions are questionable for the reasons given. Moreover, there are no sound reasons for removing the sites previously proposed.
Council Response

It is acknowledged that the size of the Hartridge Farm Road site is larger than Welsh Government guidance suggests; however, this will avoid the need to split any of the individual families, which is an important factor for the families themselves. The size, which would contain fewer pitches than Shirenewton in Cardiff, would not be the largest site in the United Kingdom, let alone Europe. The size is sufficient to accommodate all 3 families, which would meet Newport's residential need for Gypsy/Traveller provision. The proposed layout would use screening to effectively create 3 independent sites within the curtilage of the whole site. The site would also be screened from the road and nearby residential properties.

The site is within the settlement boundary and considered to be a sustainable location. Remote locations outside of the settlement boundary have poorer access to amenities and place more of an emphasis on car travel, therefore deemed to be more unsustainable. Site design can ensure it is well screened from the nearby RSPCA Centre and Llanwern High School.

The Road Safety Centre at the site would need to be relocated. The Council will assist with the relocation as best it can. This would be the case for any proposed use of the site.

No concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

It is acknowledged that the Hartridge Farm Road site will require improvements to the access road including the provision of a length of pavement. This will be agreed as part of a planning application and is not considered insurmountable.

The site will be well screened and should not impact on Llanwern High School or Ysgol Cymraeg Casnewydd. Perception of Gypsy/Travellers at the Schools is something that the Council will need to address through interaction with the Head Teacher and Governors.

The Council is aware of the financial implications to its budget.

The draft indicative layout of this site shows that a significant buffer could be provided between the RSPCA Centre and the pitches.

Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development. Ground re-profiling works will be required at Hartridge Farm Road and the work will add to the development costs, but is not considered insurmountable.

It is agreed that the locking of the underpass is something that needs to be avoided in order to ensure access to local amenities. The site is also within a short walk from Newport Retail Park.

A noise assessment has been undertaken for Hartridge Farm Road. It is proposed that a 1.8m high noise attenuation fence is constructed adjacent to the RSPCA Centre, alongside the mainline railway and between the SDR and north-eastern part of the site.

The Council has a duty to provide accommodation for the gypsy/traveller population. We do not have a duty to provide land for horses. The site will be owned and managed by the Council and there is no intention to allow the occupants to keep horses on site.

A noise attenuation fence will be constructed alongside the mainline railway and the area will be well screened.

The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.
Thank you for your email, I know when we spoke I asked you to answer all my questions, but I ask a further question who made the directive about this site as I have been told by numerous people that it came from the EU, I have spoken to my local MEP's office in Cardiff and they have told me to ask this question.

I refer you to the Overview and Scrutiny report section 6.3 and want you to add this to my objection to the site, also I want my attachment (newspaper article) to be further taken into account in my objections as if this has been reported correctly, why should any one be subjected to this behaviour by gypsies?

Paragraph 9.2.21 of Planning Policy Wales (5th Edition, November 2012) requires Local Authorities to set out the need for and to make appropriate provision for Gypsy and Traveller accommodation in Local Development Plans. Welsh Government Circular 30/2007 explains this further by asking for Local Authorities to define the need and to provide an evidence base for that need. Plans should provide for the need and set out criteria based policies for future proposals.

Overview and Scrutiny report paragraph 6.3 notes: "It should be noted that the Welsh Government has ruled out the A449 depot due to it precluding use of the A449 slip roads, and that the Brickyard Lane site is subject to a highway safety objection. The use of the Hartridge Farm Road site would potentially create one very large site and be contrary to Welsh Government guidance. It would also have the greatest financial implications."

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

The Council is aware of the financial implications to its budget.

It is acknowledged that the size of the Hartridge Farm Road site is larger than Welsh Government guidance suggests, however this will avoid the need to split any of the individual families, which is an important factor for the families themselves. The size is sufficient to accommodate all 3 families, which would meet Newport’s residential need for Gypsy/Traveller provision. The proposed layout would use screening to effectively create 3 independent sites within the curtilage of the whole site. The site would also be screened from the road and nearby residential properties.

As with any other significant development, the Council has liaised with the Police in respect to the proposed sites and will continue to consult them throughout the detailed design process.
### Representation Details

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Document: Revised LDP, p.76
Policy: H16.02
Summary: Objection to proposed Gypsy and Traveller site at Former Ringland Allotments.
We the undersigned wish to register our objection to the Gypsy and Traveller site proposed at the Former Ringland Allotments.

Our reasons are summarised as follows:

Council guidelines – Part of the original 220 site survey quoted that this site was unsuitable due to there being “Pylons onsite and unsuitable access”, this hasn’t changed and remains a major issue. This is one of the main reasons the travellers themselves do not want to occupy this site.

Health issues related to pylons – There are numerous well documented papers relating to the health consequences of living near to electricity pylons. As study of childhood cancers recorded between 1963 and 1995 in England and Wales revealed that there is an increase in risk of children contracting leukaemia of 69% if they live within 200m of a power line and 23% if they live within 600m of a power line.

Location – The Council have favoured sites to the east of Newport as the preferred location. Travellers have expressed no such preference as to the location and are more concerned as to establishing a selection on suitability not location.

Land presentation – This site is not on level ground. The site is on a gradient unsuitable for siting caravans.

Access – Access to this would be shared with the proposed 1100 houses of Gallagher development which would increase traffic many fold on what is effectively a country lane. The turning in and out of the site by vehicles would be problematic given the location of the land and the fact that the road turns directly off from the 50mph limit SDR.

The Council has previously identified this land in part for the provision of a roundabout which would then create an access to the proposed site directly off or close to that roundabout. Such a situation at other possible sites has been condemned by both the Police and Highway Authorities.

Existing use – The allotment site is still a Statutory Allotment site and is not surplus to the requirement of the residents.

Aspect – The site is highly visible from the A48 so would potentially create a very poor image of Newport as this is one the major routes into the city. The site would afford no privacy for families living there.

Safety – The A48 is a very busy major route into Newport and has a 50mph speed limit and the regular movement of heavy good vehicles. Caravans and trailers would severely worsen the road safety situation.

Environmental – Council guidelines dictate that when selecting sites priority should be given to Brown field. This area is an undeveloped Greenfield site which is outside current development boundaries and currently provides a green wedge.

Amenities – Access to local amenities is via an underpass to Dawson Close in Ringland. This underpass has previously had to be locked on a regular basis due to safety and antisocial behaviour issues. Such issues are likely to be considerable exacerbated by the proposed development. The access to the underpass is also often affected by flooding during periods of heavy rain.

Flooding – The A48 is often affected by flooding due to run off of surface water from the site and this would be exacerbated by the proposed development. Pooling water on a main access route with a 50mph speed limit creates a considerable safety hazard.

Financial Implications – The development of adjacent land for housing by Gallagher Estates would be very unlikely to go ahead if a Gypsy and Traveller site were provided on this land. This would be a loss to the City of amongst other things the payment of the 106 agreement.

Privacy – Due to the closeness of the SDR and the openness of the site there would be privacy issues.

Noise- Due to the closeness of the SDR there would be a noise issue.
Potential danger caused by animals – it is well known that many traveller families keep a stock of ponies and horses. There are also many well documented examples of these animals escaping their confines. An animal of this nature running out onto the SDR or found wandering though the neighbouring Ringland estate will undoubtedly cause issues and even cost lives in the case of the SDR.

The Process – The Scrutiny Report dated 29th October, 2012 and, consequently, accepted by Cabinet on 12th November 2012 is inconsistent, biased, is incomplete in its assessments made and offers no analytical evidence of the preferences made for the selection of travellers sites as claimed. The Policy Review Group recommendations display a lack of understanding of the Travellers needs which was further reinforced by a member of the Policy Review Group during Full Council on 4th June 2013 displaying a serious lack of understanding of what constitutes a Travellers Site thus casting further, serious, doubt on the integrity of the aforementioned report they produced.

In conclusion this site is neither suitable for the provision of traveller site. Further the integrity of the Policy Review Group’s Report, recommendations and conclusions are questionable for the reasons given. Moreover, there are no sound reasons for removing the sites previously proposed.
Health Issues and Pylons - No concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

Location - The site is adjacent to the settlement boundary and considered to be a reasonably sustainable location. More remote locations that are further outside of the settlement boundary have poorer access to amenities and place more of an emphasis on car travel, therefore deemed to be more unsustainable.

Land Presentation – Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development. The results of these surveys have confirmed that some ground re-profiling works will be required at the Former Ringland Allotments. This work will add to the development costs but is not considered to be insurmountable.

Access – Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

Existing Use – There are no allotments on the site. Alternative allotment provision can be investigated if it is demonstrated there is insufficient allotment provision across Newport as a whole.

Aspect – A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

Highway Safety – Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

Environmental – The Council Strategy is a Brownfield led strategy and preference is given to sites which are previously developed. A number of greenfield sites are within the Plan as they are considered appropriate and well located for development. This is why this site is included.

Amenities – It is agreed that the locking of the underpass is something that needs to be avoided in order to ensure access to local amenities.

Flooding – Flood risk at this site is not considered to be a significant risk.

Financial Implications – The Council is aware of the potential financial implications of going ahead with the site. Gallagher Estates have planning permission for their major development in close proximity to the site and although they have submitted representations of concern, they are currently continuing to submit information to enable them to discharge planning conditions and get on site and build.

Privacy and Noise – A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

Potential danger caused by animals – The Council has a duty to provide accommodation for the Gypsy/Traveller population. We do not have a duty to provide land for horses. The site will be owned by the Council and there is no intention to allow the occupants to keep horses on site.

The Process – The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.

Crime/Perception of Crime – As with any other significant development, the Council has liaised with the police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the police if any incidents of crime that relate to the site are reported.

Alternative Sites – Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

House Prices – The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.
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Document: Revised LDP, p.75
Policy: H15.02
Summary: Object to proposed Gypsy site on former Ringland Allotments site.
I wish to register my objection to the Gypsy and Traveller site proposed at the Former Ringland Allotments.

Health issues related to pylons. Council guidelines – Part of the original 220 site survey quoted that this site was unsuitable due to there being "Pylons onsite and unsuitable access", this hasn’t changed and remains a major issue. This is one of the main reasons the travellers themselves do not want to occupy this site.

Health issues related to pylons – There are numerous well documented papers relating to the health consequences of living near to electricity pylons. As study of childhood cancers recorded between 1963 and 1995 in England and Wales revealed that there is an increase in risk of children contracting leukaemia of 69% if they live within 200m of a power line and 23% if they live within 600m of a power line.

Land presentation – This site is not on level ground. The site is on a gradient unsuitable for siting caravans.

Access – Access to this would be shared with the proposed 1100 houses of Gallagher development which would increase traffic many fold on what is effectively a country lane. The turning in and out of the site by vehicles would be problematic given the location of the land and the fact that the road turns directly off from the 50mph limit SDR.

Aspect – The site is highly visible from the A48 so would potentially create a very poor image of Newport as this is one the major routes into the city. The site would afford no privacy for families living there.

Safety – The A48 is a very busy major route into Newport and has a 50mph speed limit and the regular movement of heavy good vehicles. Caravans and trailers would severely worsen the road safety situation. Very unsafe for families with young children.

Environmental – Council guidelines dictate that when selecting sites priority should be given to Brown field. This area is an undeveloped Greenfield site which is outside current development boundaries and currently provides a green wedge.

Amenities – Access to local amenities is via an underpass to Dawson Close in Ringland. This underpass has previously had to be locked on a regular basis due to safety and antisocial behaviour issues. Such issues are likely to be considerable exacerbated by the proposed development. The access to the underpass is also often affected by flooding during periods of heavy rain.

Flooding – The A48 is often affected by flooding due to run off of surface water from the site and this would be exacerbated by the proposed development. Pooling water on a main access route with a 50mph speed limit creates a considerable safety hazard.

Privacy – Due to the closeness of the SDR and the openness of the site there would be privacy issues.

Noise – Due to the closeness of the SDR there would be a noise issue.

Potential danger caused by animals – it is well know that many traveller families keep a stock of ponies and horses. There are also many well documented examples of these animals escaping their confines. An animal of this nature running out onto the SDR or found wandering though the neighbouring Ringland estate will undoubtedly cause issues and even cost lives in the case of the SDR.

This will affect a lot of older people who would be afraid. To use the under pass going into Dawson close there are a lot of older people on cot hill this will affect their lives considerably.
Objection noted.
No concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development.

The results of these surveys have confirmed that some ground re-profiling works will be required at the Former Ringland Allotments. This work will add to the development costs but is not considered to be insurmountable.

Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

The Council Strategy is a Brownfield led strategy and preference is given to sites which are previously developed. A number of greenfield sites are within the Plan as they are considered appropriate and well located for development. This is why this site is included.

It is agreed that the locking of the underpass is something that needs to be avoided in order to ensure access to local amenities.

Flood risk at this site is not considered to be a significant risk.

The Council has a duty to provide accommodation for the Gypsy/Traveller population. We do not have a duty to provide land for horses.

The site will be owned by the Council and there is no intention to allow the occupants to keep horses on site.
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**Document:** Revised LDP, p.75

**Policy:** H15.02

**Summary:** Object to proposed Gypsy and Traveller site at former Ringland Allotments
I wish to register my objection to the Gypsy and Traveller site proposed at the Former Ringland Allotments.

Health issues related to pylons. Council guidelines – Part of the original 220 site survey quoted that this site was unsuitable due to there being “Pylons onsite and unsuitable access”, this hasn’t changed and remains a major issue. This is one of the main reasons the travellers themselves do not want to occupy this site.

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Flooding – The A48 is often affected by flooding due to run off of surface water from the site and this would be exacerbated by the proposed development. Pooling water on a main access route with a 50mph speed limit creates a considerable safety hazard.

Privacy – Due to the closeness of the SDR and the openess of the site there would be privacy issues.

Noise – Due to the closeness of the SDR there would be a noise issue.

Potential danger caused by animals – it is well know that many traveller families keep a stock of ponies and horses. There are also many well documented examples of these animals escaping their confines. An animal of this nature running out onto the SDR or found wandering though the neighbouring Ringland estate will undoubtedly cause issues and even cost lives in the case of the SDR.

This will affect a lot of older people who would be afraid. To use the under pass going into Dawson close there are a lot of older people on cot hill this will affect their lives considerably.
Objection noted. No concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development.

The results of these surveys have confirmed that some ground re-profiling works will be required at the Former Ringland Allotments. This work will add to the development costs but is not considered to be insurmountable.

Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

The Council Strategy is a Brownfield led strategy and preference is given to sites which are previously developed. A number of greenfield sites are within the Plan as they are considered appropriate and well located for development. This is why this site is included.

It is agreed that the locking of the underpass is something that needs to be avoided in order to ensure access to local amenities.

Flood risk at this site is not considered to be a significant risk.

The Council has a duty to provide accommodation for the Gypsy/Traveller population. We do not have a duty to provide land for horses.

The site will be owned by the Council and there is no intention to allow the occupants to keep horses on site.
Representation Details

by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M

Rep'n/Para/Policy Representer Agent Accession No Date Lodged Late? Source Type Mode Status Status Modified
3801.L2//SP08 Forrest, Mr Stuart 22/07/2013 E O M

Document: Revised LDP, p.22
Policy: SP08
Summary: Propose amendment to SLA at Langstone.

11 11 Representation
However, further improvement could be made to the plan in protecting Langstone village from further major development by adding the countryside north of the A48 that is outside of the boundary settlement, up to and including Old Roman Road, and designate it as a "Special Landscaped Area".

Item Question Council Responses

13 13 Council Response
The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales' guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.
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**Document:** Revised LDP, p.75  
**Policy:** General G&T  
**Summary:** Support Gypsy/Traveller Site Locations

**Item Question**  
**Representation Text**

Having been made aware of the revisions to the above plan and in particular reference to the location of the Gypsy and Traveller sites as set out in the plan, is acceptable, and I accept and approve the revised Development Local Development Plan.

**Council Response**

Support noted.

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**Document:** Revised LDP, p.75  
**Policy:** General G&T  
**Summary:** Support the LDP with specific reference to Gypsy and Traveller sites.

**Item Question**  
**Representation Text**

Having been made aware of the revisions to the above plan and in particular reference to the location of the Gypsy and Traveller sites as set out in the plan, is acceptable, and I accept and approve the Revised Deposit Local Development Plan.

**Council Response**

Support noted.
**Representation Details**

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**Document:** Revised LDP, p.22  
**Policy:** SP08  
**Summary:** Propose amendment to SLA at Langstone.

**Item Question**  
**Representation Text**  
However, further improvement could be made to the Plan in protecting Langstone Village from further major development by adding the Countryside north of the A48 that is outside of the boundary settlement, up to and including Old Roman Road, and designate it as a ‘Special Landscaped Area’.

**Item Question**  
**Council Responses**  
The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales’ guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.
We are currently marketing various high quality properties at Imperial Park, Newport.

Fletcher Morgan are established as one of the leading firms of Commercial Property Advisors in South Wales area.

Imperial Park comprises high specification accommodation within a Tier 2 funded area which has attracted a number of quality companies. It has become a target area for organisations seeking a location on the M4 Corridor, particularly for those who currently operate across the Severn Bridge and wish to have a presence within the Welsh borders.

However we have recently had a number of potential enquirees refuse to consider the location once they are aware of the above proposed Traveller Transit site.

We are aware that the local business and residential community have been voicing their concerns quite vehemently and we would add Fletcher Morgan and our clients objections to this proposal.

There are many areas around Newport City that would meet the criteria for a Traveller site, but we do not believe that adjacent to a high technology business park which houses Defence and IT sensitive companies to be the right choice.

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.
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Document: Revised LDP, p. 75
Policy: H15.01
Summary: Objection to Celtic Way Site
Following consultation with the community I write within the Consultation Period due to expire at 5pm 26th July 2013 to object to the proposal for a Gypsy / Traveller transit site at Celtic Way, Coedkernew, Newport. My objections are detailed below.

I have spent the last 35 years dedicated to assisting inward investors to come to Wales and to support indigenous Welsh businesses in their applications to Welsh Government for grant support to grow their businesses. Throughout this time I have worked for the Welsh Office, Welsh Development Agency, Deloitte & Touche and for the last 5 years have been self-employed working from home at Celtic Horizons. My expertise lies around business planning and the presentation of applications for grant support. In all the years I have been involved in writing applications, I have yet to be unsuccessful and conceited though it may sound, I have built up a very good reputation in this important business.

To make my position abundantly clear, I know that the Travelling Community has rights and have their own identity. I am acutely aware of this since I coach a youth rugby team and some of our 16-19 year olds are from this Community and they happen to be a good bunch of lads. My concerns are not that different to those businesses involved in the property sector and those Blue-chip companies already established in the area who have written to you. We are united in not wanting this to go ahead.

Within the last few weeks I have had meetings in Bristol and Bath with two science driven companies who are looking to expand and see this part of Newport as a natural location in which to do so, being strategically located at the Gateway to Wales and within a short drive of their headquarters. Both have since visited the area and were met by Welsh Government officials and property agents.

Cumulatively these two projects were forecast to create up to 50 new jobs with average salaries of circa £45k. I outlined what grants could be available to support their plans since they were both looking at a Tier 2 area at Imperial Park. I then sent each company a proposal document and was confident we had “hooked” them. As part of the normal diligence process we provide details of available labour, property costs (including rates), communication and transportation facilities etc. To my surprise and dismay both companies informed me that they were not now going to come to Wales because they had looked at the LDP and the proposed Traveller site and concluded that this placed too many risks in their locating here from an image, security and recruitment perspective and have shelved their plans to come to Wales.

Separately, last Friday (12th July) I had a meeting with a very successful high-tech MOD contractor in Basingstoke. They too were considering coming to Wales and required a location close to the M4 and once again, this area was a strong candidate. The nature of their business requires proximity to a secure Data Centre and they visited Certus DC at Celtic Lakes (the largest facility of its type in Europe) and were suitably impressed. We discussed grant and off they went to undertake their diligence exercise. Same result. Their view was they could not put their business at risk because of the proximity of this Traveller site. 70 jobs gone.

Irrespective of the fees I have lost re these 3 cases which I am hugely annoyed about, Newport has lost three prime opportunities to showcase what it has to offer as an inward investment location.

Inward investment is one of the most competitive business activities across the globe and probably on the back of the Ryder Cup, this part of Newport has suddenly become an area of choice. Despite living and working locally I now have no choice but to discourage potential investors from considering locating in the area and I am telling them to go further west along the M4 or indeed to consider the Torfaen area. This is galling because in these 3 very recent examples the City had lost over 120 well-paid jobs, the property market has lost 3 major lets and the Council has lost significant potential revenue from commercial rates which will not now be paid. Given the unemployment statistics that were announced yesterday I would like to know who at the Council would like to take responsibility for denying 120 local families a breadwinner.

I care passionately about my work and about trying to make a difference to the economy both locally and nationally but if this proposal goes ahead the Council will effectively be saying that this part of Newport is closed for business. I have seen the representations from well-established major employers in this area and I am sure they will not be looking to make further investments and I would not be at all surprised if they looked to relocate to an area that better serves their requirements and to work with a Council that really understands the importance of wealth creation.

It seems that Newport places more importance on a minority who have made a lifestyle choice which costs those of us with a more traditional view to subsidise that choice. Not a planning point perhaps but a harsh reality nevertheless. I request that I receive a written reply to the specific points I have detailed in this letter and of course to the more general point about why the Council feels it is appropriate to put such a facility in this area, when even prior to doing so, it has already resulted in such a detrimental effect on the business community.
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The Celtic Way site is not suitable for a number of reasons & should be removed entirely. The proposed redevelopment of the Panasonic site will not go ahead as who would want to invest in an area which will be riddled with crime & anti social behaviour? Newport CC will lose a considerable amount of potential council tax on this proposed homes if the redevelopment does not now go ahead. It is much more practical to keep all the traveller community together therefore the site at the former Ringland Allotments should be 1st choice for the transit site not a contingency. The decision to base the site at Celtic Way is flawed as it surrounded by business and is in a commercial setting which would offer no privacy. It would also drive away local businesses from the surrounding Imperial Park sites which currently also bring in a considerable amount of revenue for Newport City and its Council. One of the desired factors the Travellers wanted is to be not to close to local objectors. Considering thousands of residents object to this from the large privately owned housing site directly next to the proposed site then surely Newport CC should take this into consideration? The residents will certainly not be giving them the privacy that they seek as the local residents will be keeping a close eye on their actions in order to protect their own property and also protect their right to a peaceful life in their own homes. Will Newport Council be compensating the residents who will lose the right to enjoy their homes peacefully under the Human Rights Act? It is the public authority's duty to take action to allow residents to enjoy their home life, not to create a situation where you are actually taking this right away! There a number of elderly residents who live there who will frightened to leave their homes when there is such an increased risk of violence, muggings and anti social behaviour. The land is a environmental green field site and as such putting a traveller site there will have a massive negative impact on the local wildlife which is in abundance in this area.
The Panasonic application is progressing and the proposed transit site is not expected to have any impact on the site.

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.

As with any other significant development, the Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.

The transit site will be clearly defined, maintained and managed. Any unauthorised expansion onto the SSSI is likely to be dealt with swiftly with Police action, who will be able to move on unauthorised encampments once the Council has a transit site.
### Representation Details

**Document:** Revised LDP, p.75  
**Policy:** H15.01  
**Summary:** Objection to the Celtic Way Site

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**Item Question**  
**Representation Text**
I would like to formally oppose the proposed Traveller Transit Site within an up and coming Business Park at Celtic Way by Newport County Council.

The Business Park is an integral asset to Newport's future economy and growth and I fail to understand that lack of foresight and strategical business focus by NCC's planning team and councillors backing the proposal. It certainly puts into question whether they have the right capability to make important decisions on the future of Newport's based on their proposal for a Travellers site, slap bang in the middle of an up and coming Business Park, a golden nugget of opportunity for transport for Newport.

Celtic Springs Business Park and surrounding area boasts prestigious transport links to Cardiff and M4 access and is already accommodating high profile companies looking to invest further. There is room for future expansion securing jobs within Newport, and has potential to attract and promote further inward investment, if marketed well. Let's face it, the town centre is a shambles and this Business Centres offers our only hope.

However, I am flabbergasted at the mere suggestion of a Traveller Transit site in or near the Business Park. This would be catastrophic to current Businesses who will need to justify to their stakeholders whether to continue with their current business or consider planning any further investment in the areas. In fact, it will drive out business. I have already heard that some companies are seriously considering this already. Having a Traveller site on their doorstep will threaten their stability of their business plans and subsequently result in loss of jobs. Employers have a duty of care to ensure the security and safety of the business and employees. Their employees are concerned about the threat on their safety to from work if this proposal goes ahead. You must bear in mind, that employees are in fear of their vehicles broken into and whilst walking from work with Travellers in the area. In terms of the businesses they would have to step up considerably security costs.

I understand that there are plans for more infrastructure by way of a rail station in Coedkernew, which increases commutability for the Business Park along with the M4 access, making this business Park a prime location for businesses. However, the Rail company have stated that they will withdraw this plan if the Traveller site goes ahead in Coedkernew which is devastating. This would be a negative blow to the future of the Business Park as additional transport links would certainly attract and influence businesses and inward investment.

I understand that the EU and the WAG require councils to accommodate Travellers or lose funding, which is blackmail by anyone's standard and question this underhand tactic used. Councils must protect the community interests when assessing and proposing sites and not just have the Travellers interests at heart which seems to be the case all too often. If this proposal goes forward, NCC will upset thousands of nearby households who have saved hard to build up their homes through taxes and rates. To spend £6.3M on a Traveller site is outrageous when there are so many homeless people in Newport anyway. It is even more incredible that NCC have approached the main 2 Traveller families on a more personal level without consulting with the businesses and nearby residents, on the same level. This in itself draws attention to the preferential treatment of Travellers to that of local residents and businesses alike, not equal opportunities! Multicultural and integration means everyone living alongside each other but not creating segregation and territorial areas for different cultures and diversities. NCC is creating "no go " areas which just increases the problem. Are we all allowed to move into the Traveller sites, if we are all equal? Why are we spending £6.3M for one culture - it contradicts the who integration policy. The common rate payer cannot get anything from NCC feel I am not getting fairness and equality back from NCC.

From a residential perspective, the impact of having this on the surrounding residential areas is huge. Every year, the Traveller's take their annual holiday in Tredegar House car park and the Council do absolutely nothing to evict them from our beauty spot. The clean up costs to the council tax payer a fortune but year on year the event takes place, again preferential treatment to the Travellers at our expense.

If NCC are under the illusion that a transit site will prevent this happening, then they need to think again, as the site will become an additional facility to Travellers and those that cannot get in, will continue to park outside or land on any free space they see fit. Again the Council will do nothing and the Police powerless. All this is a living nightmare for residents.

I myself, have had Traveller horses in my garden as well as them charging up the street which is extremely dangerous to children or cars coming out of driveways. The Travellers themselves walk through late at night and early hours, clearly drunk, shouting abuse and threatening. All residents are on edge and do not want to leave their homes for fear of burglaries or damage to properties. Most residents go out to work and have to leave their homes under duress because of a potential break in, not to mention the elderly who are afraid.

On 3 occasions, I have experienced Travellers taking ownership of a vacant Business car park at the end of Pencarn Avenue, - it was hell. The Travellers stabled their horses in my back lane, left their wild dogs roaming the streets and fouling pathways and gardens. Their dogs are vicious too, as when I took my dog for a walk they came at us from all directions and I had to pick up a piece of wood to defend myself. The Travellers were aggressive and threatening telling me not to touch their dogs or they would attack me, its shocking. But the police are slow to respond and don't take much action at all. I have also called police because a 2 year old in a nappy was wandering up and down the road in Imperial Way unsupervised with no adult on site. Car's were driving past her whilst she was in the road, its shocking and if that was residents children, they would be taken into care. Not to mention that last year in Newport, police and NCC played down an armed siege with Travellers. Can you honestly say that you would want this on your doorstep!!

12/02/2014
Whilst local authorities seem to enjoy calling this "stereotyping the Travellers", which is a convenient way to tell us to shut up and put up! The truth is, that all of this, is a fact, and they know it. They know the extra policing and monitoring is going to cost us a fortune and yet NCC have not produced a business plan of how they are going to police, monitor and pay for all this. This will be an annual cost in addition to the £6.3M cost, to buy and build the site out of tax payer's money, it is not acceptable. I would like to see NCC's business plan and on-going costs to the rate payer to support this site each year. This must be available to all Newport council tax payers so that everyone is made aware of what the on-going cost is to them. Please submit this to me asap.

I will also expect to be exempt from paying council tax as my house value will decrease in value considerably, and indeed envisage non saleable— you will need to factor this cost into your business plan budget too.

I have given you just some of the reasons for my objection so that its is made clear, the depth of the problem this brings to the area. Why upset thousands of residents lives and disengage businesses which will be another disaster for Newport?

It makes political and business sense for NCC to find a more suitable site, a site they do not have to buy, with less impact of Newport's future growth. The A449 slip road can be overcome as it does with the big events and the reasons for not electing this site is inexcusable and must be taken forward as the best option. The allotments is another alternative. The whole suggestion of using Celtic Way has already had a negative impact on the Business Park from a reputational perspective, as potential businesses who were considering investing in the area, will have already turned tail and run, just by hearing the very suggestion.

Well done NCC for another proposal to help Newport fail. I will expect the incompetent Councillors and Planners involved in this decision to step down or be sacked, as they clearly don't have the capability to deliver the right vision and strategy for Newport. They have been in the same comfortable job, for too long and become inward thinkers. We want new Leadership, with the right skills and business acumen who can make inspirationally sound investment decisions that will secure Newport's growth, economy and success.

Please send me an acknowledgement receipt and I look forward to hearing from you.
It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council's duty and enabling the Police to use its powers to move on other unauthorised encampments.

It is considered that the transit site will not have any impact on the delivery of the proposed railway station at Coedkernew.

It is considered that the 6 week consultation process was sound. The proposals and consultation opportunities were advertised in the South Wales Argus, along with Newport Matters which is delivered to every home in Newport. All Community Councils were informed of the consultation, including Coedkernew. In addition, the consultation was advertised on the Council’s website and thousands of letters were sent out to stakeholders and members of the public. It is acknowledged that there was a fault with Newport City Council’s website during the weekend of 20/21 July. As a result, the Council took the reasonable step of extended the consultation for a further weekend.

The transit site will be clearly defined, maintained and managed. Any unauthorised expansion onto the SSSI is likely to be dealt with swiftly with Police action, who will be able to move on unauthorised encampments once the Council has a transit site.

The Council has a duty to provide accommodation for the Gypsy/Traveller population. We do not have a duty to provide land for horses. The site will be owned by the Council and there is no intention to allow the occupants to keep horses on site.

As with any other significant development, the Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.

The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
Representation Details

by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M
Rep’n/Para/Policy Reprenator Agent Accession No Date Lodged Late? Source Type Mode Status Status Modified
3808.L1//H15.01 Johns, Mr Simon 22/07/2013 E O M

Document: p.75
Policy: H15.01 Map: Proposals West: Proposals Plan - West
Summary: Delete Celtic Way gypsy and Traveller Transit site.

Item Question Representation Text
11
As a resident and council tax payer of this area, I right to express my complete rejection of this ill thought out proposal. It would seem to me that every area of Newport has galvanized public opinion and effectively stopped this proposal taking place. Yet, I am totally appalled that it is now proposed that the transit site is taking place on my doorstep.

Please take note of the obvious rise in crime and anti-social behaviour which is proven fact to increase if this proposal takes place. The site is in an area where job availability are looking to be increased with the attraction of employers at Celtic Springs / Imperial Business Park. Take it from me, this will not happen if this proposal takes place.

Please take note of my concerns and stop this happening for the benefit of all of us.

Item Question Council Responses
13
It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

As with any other significant development, the Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.
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<td>Delete an existing site</td>
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The plan does not meet the following Soundness test and key requirements PAS 2013:

1. Building a strong competitive economy - does not encourage economic growth.
2. Supporting a prosperous rural community - does not promote support for businesses.
8. Promoting Healthy communities - does not provide safe and accessible environments where the fear of crime does not undermine the quality of life or community cohesion.
11. Conserving and enhancing the natural environment - does not create protect or enhance.
6. Delivering a wide choice of high quality housing - actually takes away from current quality housing.
The Plan requires changing as it does not currently meet all of the key requirements as set in the Planning Advisory Service 2013 Soundness Self Assessment Checklist as listed above. To back up these views details are provided below. Each point relates to the key requirements in the Soundness Checklist (January 2013).

A traveller/gypsy site must be located away from large residential developments and commercial/industrial premises. Local businesses and communities will be under threat of:

- 11. Conserving and enhancing the natural environment - Environmental pollution - tyre burning, rubbish tipping, unkempt sites, shooting, dogs loose, horses left to graze. Tendency to spread out and populate wider area habitually and illegally. Requirement to protect unacceptable risks from pollution and minimise impacts on bio/geo diversity. This site contravenes the LDP policy to protect natural environments. The gypsy/traveller site will not converse or enhance.

- 8. Promoting Healthy Communities - Security/Crime/Safety/Abuse - Police stats report that unsocial behaviours and domestic abuse amongst gypsy communities cause an increase in police attendances due to crime and petty crime (car craft Newport being one recent example of gypsy theft involvement). The Police have themselves raised concerns about the Celtic Way Proposal with regard to safety and illegal spread to other vacant land in the area. The Soundness test states there is a requirement to safeguard valued facilities and services and to support development. Planning Policy also states that authorities should have due regard to protection of local amenity and local environment yet no evidence of this has come to light in the LDP.

- 3. Supporting a prosperous rural community and 1 Building a strong Competitive Economy.

- There is current business prosperity and growth in the area with the development of Celtic Springs and Cleppa Park with the adoption of buildings by companies such as Quinn Radiators, Data Storage, EADS The National Grid and ALUK. This LDP site proposal does not encourage sustainable growth but in fact goes against growth with such companies re-evaluating their desire to stay in this vicinity should the traveller site go ahead.

- Thousands of people are employed in these businesses - essential jobs for the Newport economy.

- Quinn Radiators employ over 250 people and have stated genuine concerns over their companies future desire to invest should the traveller site go ahead.

- 2 week transit site - it is suggested that stays at the Celtic Way site will be limited to 2 weeks. How does the Council expect to enforce this. Not only will they not be able to as the traveller communities have a general disregard to social etiquette and rules but enforcement of vacation of a site is likely to involve police support and cost more money. We are not aware of any information regarding management of the site via the LDP and have seen no plans on how the Council will actively manage the site.

- Delivering a wide choice of high quality housing - The LDP has an incoherent strategy in that the proposal of the transit site contradicts the development of quality housing. The site would have a detrimental affect on current quality of housing at Celtic Horizon and the proposed housing at the former Panasonic site. It is believed by the community that houses will not sell and proposals to build 250 houses on the old Panasonic site should be questioned.

- In June 2012 a Welsh Newspaper reported *"A couple say they are demolishing their 450,000 home after failing to sell it because prospective buyers are put off by the Gypsy traveller site next door.*

- As stated above not only are travellers disruptive to communities but also pose a huge threat to businesses within an area. As Celtic Way is located within both of the above we and many others would question why our views as residents in what is currently a safe community should agree with the Councils revised plans for a traveller site in this area. It is evident from the above that key requirements of the Soundness test have been overlooked making this LDP unsound.

12 12 Speaking at Public Examination Yes
It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

The transit site will have waste disposal facilities on site.

As with any other significant development, the Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

As noted, the transit site will only permit gypsy/travellers to stay for a set duration. Exact management arrangements have not yet been confirmed, but there will be a site manager who will be able to enforce this.

The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.
Item Question

Representation

However, further improvement could be made to the Plan in protecting Langstone Village from further development by adding the Countryside north of the A48 that is outside of the boundary settlement, up to and including Old Roman Road and designate it as a 'Special Landscaped Area'.

Council Response

The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales’ guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.
### Representation Details

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**Document:** Revised LDP, p.75

**Policy:** H15.01

**Summary:** Object to proposed Gypsy and Traveller Site at Celtic Way.

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**Representation Text**

I am writing to log my objection to the proposed transit Gypsy Traveller Site at Celtic Way (Newport Local Development Plan 2011-26/Revised Deposit Plan) on financial grounds, in line with Newport Council's duty to carefully manage tax payer's money.

I have attended two presentations from the planning team at Newport Council, both of which you led on the gypsy and traveller site part of the Revised Deposit Plan. You clearly set out on your slides the criteria required for the Gypsy and Traveller transit sites and this information is in line with the Welsh Government Document Good Practice Guide in Designing Gypsy sites (2009)

You stated that the transit site is required for gypsies and travellers passing through Newport who wish to 'stop off' for an average of a two week stay.

The criteria set out on your slides were:
- Managed site
- Water/electricity/other services
- Toilet facilities
- Maximum stay likely to be 2 weeks
- Fees payable for stay on the site

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**Council Responses**

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The proposal is for a transit site providing temporary short-term accommodation, rather than a permanent place to live. In this context, the adjacent land uses to the Celtic Way site are not considered to be hazardous, however it is agreed that they are not suitable places for children to play. The indicative layout of the transit site will include green areas for play and therefore children will have onsite facilities.

The site will be designed as a transit site and therefore only used by Gypsy/Travellers on a temporary basis as they pass through Newport. It is expected that the Gypsy/Travellers will use their vehicles to move around and there will be limited activity in terms of moving around the area on foot. Therefore the fact there is poor street lighting and a lack of pavement is not considered to be a significant concern. Increased street lighting could be provided if Members consider it to be essential.

Development alongside water can enhance the setting of an area. Safety around lakes is something that children from all cultures need to be aware of and is not considered an obstacle to development.

There are numerous homes within Newport which are within 0.5 miles of a railway line.

The substation is fenced in and secure.

Any risk from urban foxes is applicable across all urban areas of Newport and is not considered to be a major concern that will affect the delivery of the site.

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
I have already raised with you at the first presentation in the community building in Duffryn that a site which meets all of these criteria already exists just 960 meters from the proposed transit site in Celtic Way. Your only response to me at that meeting was that the land has to be owned by Newport Council. In fact the land at Tredegar House and Caravan Park is owned by Newport Council according to the NCC website. I would like you to explain to me very clearly why, if the existing site at Tredegar House Park meets all of the necessary criteria, it cannot cater for ALL travellers with caravans passing through Newport as you describe.

There are many different types of people who make up the world that we live in, many of them have caravans and choose to travel around Britain (and wider afield) for part or all of the year. When they visit an area, like Newport, they locate a caravan site, book a space and stay for the arranged time. They use the facilities whilst they are on the site and pay the fees accordingly.

Why then are the Council proposing to separate some travellers with caravans from others who choose to pass through Newport with their caravans? I note that although there may be some ‘reasonable adjustment’ made at existing facilities for some individuals i.e. disabled people, there are not designated sites set aside for people with specific beliefs/cultures/religions/disabilities/age ranges etc.

Please explain to me why Newport Council are planning to spend millions of pounds on setting up a transit site 960 meters from an existing site, for people who are travelling through Newport with caravans, I fail to see how this makes sense.

I reiterate that due to the financial impact, in times of austerity, ALL members of the public, regardless of race, religion, age, disability or anything else should be provided for in the same way when travelling through Newport in a caravan.

I await your detailed response to my question.

The caravan park at Tredegar House is a privately run holiday facility. The Council has a duty to ensure appropriate accommodation is available to gypsy/travellers passing through the area. Tredegar House does not provide this.
Representation Details

by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M

Rep'n/Para/Policy  Representor  Agent  Accession No  Date Lodged  Late?  Source  Type  Mode  Status  Status Modified
3811.L3/H15.01  Middleton, Dr Carolyn

Document: Revised LDP, p.75
Policy: H15.01
Summary: Objection to proposed Gypsy site at Celtic Way

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Item Question  Representation Text
I am writing to log my objection to the proposed transit Gypsy Traveller Site at Celtic Way on the grounds of Health and Safety (Newport Local Development Plan 2011B26/ Revised Deposit Plan).

The Welsh Government state clearly in their document ‘Designing Gypsy and Traveller Sites Good Practice Guide (2008), in section 3.3: ‘It is essential to ensure that the location of a site will provide a safe environment for the residents. Sites should not be situated near refuse sites, industrial processes or other hazardous places, as this will obviously have a detrimental effect on the general health and wellbeing of the residents and pose particular safety risks for young children. All prospective site locations should be considered carefully before any decision is taken to proceed, to ensure that the health and safety of prospective residents are not at risk.’ Clearly safety is of key importance.

Similarly in the Welsh Governments ‘A Road Less Travelled - A Draft Gypsy Traveller Strategy Consultation Document’ clearly state that health and safety requirements including the safety of play areas are of high importance.

I am therefore absolutely amazed and horrified on this basis, that Newport Council in their Revised Deposit Plan (June 20B) as part of their Local Development Plan, have actively chosen to site the proposed transit Gypsy Traveller Site at Celtic Way (see appendix one), which hasto constitute probably one of the most dangerous pieces of land in Newport.

OPEN WATER

The proposed site is situated in an area known as Celtic Lakes; it gets its name from the thirteen areas of open water or lakes in the immediate vicinity of the proposed transit Gypsy Traveller Site at Celtic Way (see appendix two). It is therefore important to note that:

1. There are thirteen separate areas of open water or lakes in the immediate vicinity of the proposed Gypsy Traveller Site (see appendix one).
2. These thirteen lakes give a combined total surface area of water of 38,276 square metres.
3. The lakes range from the largest with a surface area of 8,376 square meters to the smallest with a surface area of 890 square meters.
4. To give some perspective on the scale of the open water in the area, the total surface area of water from these lakes is nearly double the total ground area of the proposed Traveller site, which is in the region of 24,546 square meters or 6.07 acres.
5. The nearest lake is just 22 metres from the site, again to put this into perspective, the average family car being just under 5 meters long, this means that the open water is between 4 to 5 car lengths from the proposed Traveller site.
6. Also the nearest lake to the proposed site is one of the largest of the lakes and has a surface water area of 6,070 square meters.
7. The furthest lake is a mere 680 metres, but five of the lakes are only between 200 and 350 metres from the proposed site.
8. Within 402 meters (1/2 mile) of the proposed site there is a total of 15,577 square meters of surface water or lakes which equates to 3.85 acres.
9. Within 804 metres (1/2 mile) there is at total of 38,276 square meters of surface water or lakes which equates to 9.46 acres.
10. All of the lakes are VERY CLOSE to the proposed Traveller site, they are not enclosed, there are no warning signs in place and no buoyancy aids for first aid purposes.
11. As well as these identified lakes there is a myriad of water ways including reanes and drainage ditches with very steep sides, therefore a child falling into one of these ditches may not be able to climb back out.
12. The reanes and ditches equate to approximately 5,760 metres or 3.6 miles of waterways within 1/2 mile from the proposed site (See appendix 3).
13. There are no street lights in this area which means that the area is very poorly lit, this significantly increases the risk of a child falling into one of these areas of open water and drowning.

The Environment Agency UK(2006) reported that drowning is the third most common cause of accidental death among young people in England, Wales and Northern Ireland, with average of 300 such deaths each year. The agency also states that the highest death toll within inland areas of water is attributed to drainage control ditches in urban sites. Furthermore, the Environment Agency UK(2006) goes on to say that two of the most significant causes of drowning are due to ‘unfamiliar surroundings’ and an ‘inability for the person to save themselves or be rescued’.

The National Water Safety Forum UKfigures released for 2011 (the latest available) for cases of drowning, showed that 701 people drowned in 2011, of those approximately a third (n=247) drowned in inland water, such as that at Celtic Way. There is also a significant risk during winter months for areas of open water when the water freezes over, with children and adults falling through the ice and dying.

For those children who fall into water and don't drown, the Swimming Pool Amendment Bill (2009) states that 20% are left with 'debilitating injuries that will carry on for the rest of their fives....many of these injuries are brain related and incurable'. One further issue to consider according to the Environment Agency UK(2006) are the ill-health risks associated with a person having been in water of this nature.
It is pertinent that during this consultation process, the RLSS UK Cardiff Branch, featured on the BBC breakfast show on July 14th highlighting that there have been four deaths in the week preceding the broadcast, all of which had occurred in lakes and pools. Also between the 14th and 20th of July the BBC have reported a further 6 deaths from drowning in inland open water, three of which were in Wales and two of them in South Wales.

Furthermore, the UK Fire Brigade (2012) report in section 11 of the Fire and Rescue Services Act that the fire brigade is "required to equip themselves for dealing with eventualities (other than fires) which pose a threat to human life or endanger animals" because they report that in the UK about 4,000 to 5,000 large animal rescue operations each year. There is the potential for ponies to fall into the lakes or ditches in this area and being unable to get back out.

Risk assessment

Carrying out a risk assessment, with a surface area of water of 38,276 from the thirteen lakes and 3.6 miles of reanes and drainage ditches the probability of a child falling into one of these areas of water is VERY HIGH (score of 5 on the risk table).

The likely impact of a child drowning in the water surrounding the proposed site is a HIGH (score 4 on *) the risk table, escalated to VERY HIGH (score 5 on the risk table) due to the nature of the transit site with children only staying for a two week period and therefore not familiar with the surroundings including the thirteen lakes and myriad of reanes and drainage ditches surrounding the proposed site.

Therefore, the risk of a fatality due to drowning, if the transit Gypsy Traveller site is situated in Celtic Way, adjacent to thirteen lakes and a myriad of reanes and drainage ditches, is shown to be 25, THE HIGHEST POSSIBLE RISK. A risk which falls into the red area of the risk table - highest possible risk requires IMMEDIATE ACTION.

ROAD NETWORK

A second safety issues that needs to be raised in relation to the proposed Gypsy Traveller Site if it were to be situated in Celtic Way is the danger from the road network in the area (see appendix four).

The Welsh Government state clearly in their document ‘Designing Gypsy and Traveller Sites Good Practice Guide (2008) in section 3.10, that ‘Sites adjacent to light industrial areas therefore tend not to be popular because of... safety fears (when walking home at night for instance).’

It is important to note that:
• The proposed site is situated in a commercial/business / light industrial area.
• There is no pavement access to the proposed site meaning that pedestrians would have to walk on the road to access any local amenities including school, bus stop, shop et.
• The road access to the proposed site is in an industrial area, therefore there will be a significant number of commercial type vehicles in the immediate including vans, trucks and lorries.
• Due to the nature of the area being a business or commercial area the commercial vehicles will be accessing the immediate area both day and night.
• There are no lampposts in the immediate vicinity of the proposed site therefore the area is very poorly lit.
• The road access to the proposed site at Celtic Way is a 40mph road.
• The A48, a 40 or 50 mph road is a mere 0.34 miles from the proposed site.
• The planned extensive development to link up with the Southern Distributor Road, a 50mph very busy road, is a mere 0.38 miles from the proposed site which is due to be completed within the life of the local Development Plan.
• The M4 relief road proposed location is 0.44 miles from the proposed site with an estimated 10 year construction period.
• The M4 motorway, a 70mph extremely busy road is a mere 0.58 miles from the proposed site.
• Junction 28 of the M4 which constitutes an area were several major roads converge is a mere 0.82 miles from the proposed site.

The UK National figures released by the Department of Transport (2011), the latest figures released, is 5,907 deaths or serious injuries with a further 20,291 people being slightly injured. Furthermore, the Department of Transport (2011) also state that a child is struck by a vehicle travelling at a speed of up to 40 mph, 9/10 accidents result in the person being killed.

Risk assessment

Carrying out a risk assessment on the probability of a child (or adult) being involved in a road traffic accident, taking into consideration the close proximity of the existing and proposed significant development to the M4 and Southern Distributer Road, along with the existing A45, added to the issues of no pavements and poor lighting in the immediate vicinity of the proposed site, the probability of...
an accident is HIGH (score 4 on the risk table) or VERY HIGH (score 5 on the risk table). The likely impact of a child being involved in a road traffic accident even on the lowest of the speed limits highlighted (40 mph), by a commercial vehicle is VERY HIGH (score of 5).

Therefore the risk of a fatality due to a child or adult being hit by a commercial vehicle, if the Gypsy Traveller site is situated at Celtic Way, is shown on the risk assessment grid of being between 20 and 25, 25 being the HIGHEST POSSIBLE SCORE. A risk which falls into the red area of the risk table requires IMMEDIATE ACTION.

RAILWAY

A third safety issues that needs to be raised in relation to the proposed Gypsy Traveller Site if it were to be situated in Celtic Way is the danger from the railway lines in the area (see appendix four).

It is important to note that:

• The railway line is a mere 0.58 of a mile from the proposed site.
• There are plans to develop the railway with electrification of the line.
• There are plans to develop the railway network in the area with a proposed station for the Coed Kernew area identified within the life of the Local Development Plan.

The Rail Safety and Standards Board (2011) recorded 3,400 incidents of trespass and vandalism on UK railway lines during the 2009-2010 period. Also in 2011 there were 50 deaths from people trespassing on train lines and 400 near misses.

Network Rail (2013) report that 49 people died in the UK between April 1st 2012 and March 31st 2013 whilst trying to cross railway lines, they reported that "Unlike cars, trains cannot swerve and can take the length of 20 football pitches to stop.". Network Rail also reported that in 2013 there were 60 reports of children playing "chicken" with trains, more than 80 incidents of graffiti and more than 1,000 reports of stone throwing at trains. As well as the danger to the people who trespass onto the train line, Network Rail report the enormous danger to train passengers themselves with a recorded 76 shopping trolleys, 180 bikes, 7 prams and one bouncy castle being placed on train lines during 2012.

Network Rail describes The Great Western Main line as 'one of the country's most important arterial routes, linking London to Wales'. The Project Environmental Statement Wales (2013) outlines the plans for electrification between the Severn Tunnel and the Canton Depot in Cardiff.

In their safety leaflet 'Rail Life' (2012), Network Rail outlines that as well as walking on an electrified line can cause immediate death; the electricity can also cause serious injuries in other ways. The safety information states that electricity can arc like lightning or 'jump' up to three metres so a person can be electrocuted by flying a kite near or touching things in contact with overhead lines. It also cites the case of a young girl who was playing on a bridge over the railway track when she found a metal pole and pushed it through a hole in the bridge fencing, the pole made contact with 25,000 volts of electricity in the overhead line. The young girl was reported to have been badly burnt and scarred for life.

Risk assessment

Carrying out a risk assessment, with the main railway line only half a mile from the proposed site, the probability of a child (or adult) being injured by a train Medium (score of 3 on the risk table), this risk rises to High (score of 4 on the risk table) with the electrification of the line.

The likely impact of a child (or adult) being hit by a train resulting in death occurring is VERY HIGH (score 5 on the risk table).

Therefore, the risk of a fatality of a child (or adult) being hit by a train, if the transit Gypsy Traveller site is situated in Celtic Way, half a mile from the railway line is shown to be between 15 and 20. A risk which falls into the red area of the risk table requires IMMEDIATE ACTION.

ELECTRICITY SUBSTATION

A fourth safety issue that requires due consideration with the proposed Transit Gypsy and Traveller Site being situated in Celtic Way is the close proximity to the Electricity Substation.
The Western Power Distribution Network serves Wales, the South West and the Midlands. It has a National Grid conveying electricity at 275,000 or 400,000 volts which is reduced to 132,000 volts for regional distribution at substations or grid supply points. The electricity is further disseminated to substations where it is reduced via a transformer to 230 volts to be distributed to towns etc. The Western Power Distribution Network reported having 185,000 such transformers in 2013.

It is therefore important to note that:

- The substation is a mere distance of 0.28 meters from the proposed site.
- The substation is in an area whereby there is no organised surveillance and therefore if a child (or adult) inadvertently entered the danger area it may well go unnoticed.

Every year 1,000 contacts are made with energized high voltage power lines, equipment or electrical substations each year, according to the Electric Power Generation, Transmission and Distribution Safety figures (2012). Some of these contacts have resulted in very serious injury requiring intensive care hospitalisation or death.

Risk assessment

Carrying out a risk assessment, with electricity substation being situated a mere 0.28 meters from the proposed transit site, the probability of a child (or adult) making a 'contact' with the substation is Medium (score of 3 on the risk table). The likely impact of a child or adult dying as a result of making 'contact' with the electricity substation is VERY HIGH (score 5 on the risk table).

Therefore, the risk of a fatality due 'contact' with the electricity substation, if the transit Gypsy Traveller site is situated in Celtic Way, 0.28 meters from the substation, is shown to be 15. A risk which falls into the red area of the risk table - highest possible risk - requires IMMEDIATE ACTION.

WILD ANIMAL HAZARDS

According to the University of Bristol's Mammal Research Unit, the red fox population in the UK is estimated to be 225,000 in rural areas and 33,000 in urban areas, with the highest fox densities being found in cities (2010). The hazard of foxes has been highlighted recently with twin girls being bitten in 2010 and a baby boy being reported as having been attacked in 2013 and a child in Bromley (London) being bitten this year (BBC 2013). The University of Bristol suggest that foxes pose a risk, but not a significant risk by acknowledging that biting incidents are rare, they however also raise the issue of that foxes carry a range of diseases.

Risk assessment

Carrying out a risk assessment, with the large fox population in the UK, the probability of a child (or adult) being coming into contact with a fox is Low (score of 2 on the risk table). The likely impact of a child (or adult) being injured or contracting an illness from a fox is 3 MEDIUM (score 3 on the risk table).

Therefore, the risk of an injury or illness from an encounter with a fox is shown to be 6. A risk which falls into the amber area of the risk table requires ACTION to reduce the risk.

CONCLUSION

As a health professional, I feel duty bound to highlight to Newport Council Planning Department that the land on Celtic Way, which has been proposed for a transit Gypsy Traveller site, is probably ONE OF THE MOST DANGEROUS PIECES OF LAND IN NEWPORT.

I am so concerned about this proposal that I have decided to take the steps of sending this letter to you be recorded delivery to ensure that you definitely receive it, this will give us some piece of mind. I feel that the risk associated with the open water in the area is such an important issue that it is necessary for us to lobby our local councillors, MPs and AMs as well as the Welsh Government itself to amend the National Guidance on Gypsy and Travellers to ensure that ALL proposed sites in Wales are placed a suitably safe distance from open unmanaged lakes and pools.

Having IDENTIFIED the UNACCEPTABLE RISK to children (and adults) of the proposals in the Revised Deposit Plan, I feel that the proposed Gypsy Traveller site being located at Celtic Way, on the basis of safety, taking account of the water, road, rail, electrical and wildlife risk assessments undertaken, you MUST TAKEACTION and REMOVETHIS SITE from the proposal document BEFORE A
CHILD DIES - God forbid. Continuing with the current Deposit Plan and locating the proposed Transit Gypsy and Traveller site on Celtic Way is an accident waiting to happen.

I am satisfied that following receipt of this letter, the Newport Council Planning department have been warned of the overwhelming risks of using probably one of the most dangerous pieces of land in Newport for the proposed Transit Gypsy and Traveller site. I am asking the Council: PLEASE DO NOT ALLOW A CHILD TO DIE NEEDLESSLY.

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

The proposal is for a transit site providing temporary short-term accommodation, rather than a permanent place to live. In this context, the adjacent land uses to the Celtic Way site are not considered to be hazardous, however it is agreed that they are not suitable places for children to play. The indicative layout of the transit site will include green areas for play and therefore children will have onsite facilities.

The site will be designed as a transit site and therefore only used by Gypsy/Travellers on a temporary basis as they pass through Newport. It is expected that the Gypsy/Travellers will use their vehicles to move around and there will be limited activity in terms of moving around the area on foot. Therefore the fact there is poor street lighting and a lack of pavement is not considered to be a significant concern. Increased street lighting could be provided if Members consider it to be essential.

The fact a main transport route is in close proximity to the site is considered more of an asset than a safety risk. There are numerous homes within Newport which are within 0.5 miles of a dual carriageway or motorway.

The substation is fenced in and secure.

There are numerous homes within Newport which are within 0.5 miles of a railway line.

Development alongside water can enhance the setting of an area. Safety around lakes is something that children from all cultures need to be aware of and is not considered an obstacle to development.

The Council has safeguarded an area of land for the new M4. Welsh Government has not raised the proximity of the site to the new M4 as an issue.

As with any other significant development, the Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.

As this site will only be a transit site for Gypsy/Travellers to temporarily stay, it is unlikely they will seek school places for their children.

The transit site will be clearly defined, maintained and managed. Any unauthorised expansion onto the SSSI is likely to be dealt with swiftly with Police action, who will be able to move on unauthorised encampments once the Council has a transit site.

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
## NEWPORT CITY COUNCIL LOCAL DEVELOPMENT PLAN

### Rep'n/Para/Policy: 3812.L1/General

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### Item Question

**Representation**

Having been made aware of the revisions to the plan and in particular reference to the location of the Gypsy and Traveller sites as set out in the plan, is acceptable, and I accept and approve the Revised Deposit Local Development Plan.

### Council Responses

**Support noted.**
However, further improvement could be made to the Plan in protecting Langstone village from further major development by adding Countryside north of the A48 that is outside of the Boundary settlement, up to and including Old Roman Road, and designate it as a Special Landscaped Area.

The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales' guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.
I am writing to object about the proposed Transient Traveller site at The Allotments on the bottom of Cot Hill. This is the main route into Newport from junction 24 Coldra roundabout. Placing the Site here would be an eyesore. There is evidence that Travelling Gypsies leave lots of mess. Why would it be any different here?

It would be right opposite an Estate, this is just not logical. The S.D.R is a very fast road, the children of Ringland and the Travellers will be at risk. The traffic would increase with Travellers’ going on and off the site each day.

It is already very busy with people travelling to Spytty Retail Park on the weekends. This Retail Park is good for Newport as people come from far and wide. I do wonder if it would put people off having to pass a Transient Site.

Putting wooden fencing around it would not stop noise from traffic. I know this as I can hear it at Hartridge Farm Road. We should all be working to make Newport a better place. This is definitely not the way to do it.

Privacy and Noise - A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

Highway Safety - Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

Aspect – A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

Location - The site is adjacent to the settlement boundary and considered to be a reasonably sustainable location. More remote locations that are further outside of the settlement boundary have poorer access to amenities and place more of an emphasis on car travel, therefore deemed to be more unsustainable.
**Representation Details**

by: (No grouping)

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<td>23/07/2013</td>
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Document: Revised LDP, p.76
Policy: H16.01
Summary: Object to the G&T allocation at Hartridge Farm Road and Former Allotments site, Ringland.

---

**Representation Text**

I am writing to object to the proposed Gypsy and Traveller Site at Hartridge Farm Road.

Just like many families we have saved hard to find our dream house and we did at Hartridge Farm Road. We have been the envy of friends and visitors because of our wonderful location.

I still cannot believe you are actually planning on putting a Gypsy and Traveller site here which could potentially be the biggest in Europe. I suppose that is one way of putting Newport on the map!

This is causing me and my husband many sleepless nights. Do you care about us?

I work at the state of the art, brand new, £29,000,000 Llanwern High School. I know these children very well. Putting this site here would be like a red rag to a bull. I can imagine the children provoking the Travellers then running across the S.D.R to get away. It would be a matter of time before there is a serious accident. This is why I am making sure my comments are on record. I would be devastated if anything happened to any of our children regardless of where they are from.

There was an incident in 2006 when Hartridge had a lock down as two Travellers came into school carrying a gun with dogs (after being provoked by pupils). I remember some parents coming to collect their children. This should be on record.

The staff at Llanwern High are working really hard to turn the school around. Progress is already being made as we are getting more pupils from outside the catchment area. Exam results are expected to be better than ever. I believe placing the Gypsy and Traveller Site here would jeopardise the progress made in selling our state of the art school to potential pupils.

I know the Allotment Site is second choice at the moment for Transient Travellers. But, if that also came here, then Gypsy and Travellers would be both sides of £29,000,000 school!

Please, please think again before you allow this catastrophe to happen.

---

**Council Responses**

The Council as a duty to identify the need within its area for gypsy and traveller sites, and then to find sites to address that need. The LDP must provide sufficient land to meet the need arising during the Plan period. The site, which would contain fewer pitches than Shirenewton in Cardiff, would not be the largest site in the United Kingdom, let alone Europe.

The site will be well screened and should not impact on Llanwern High School. Perception of Gypsy/Travellers at the School is something that the Council will need to address through interaction with the Head Teacher and Governors.

As with any other significant development, the Council has liaised with the Police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the Police if any incidents of crime that relate to the site are reported.
While we accept in principle the Revised Deposit Local Development Plan prepared by the City Council we do feel that it could be improved by including extra measures to preserve some of the attractive countryside and green spaces on the outskirts of the city by designating as "Special Landscaped Areas" green field sites such as, for example, the land north of the A48 that is outside the boundary settlement, up to Old Roman Road.

The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales' guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.
### Representation Details

**Document:** Revised LDP, p.75  
**Policy:** General G&T  
**Summary:** Support the Gypsy and Traveller allocations.

#### Item Question  
**Representation Text**

11  
Other than this we approve of the revised plan, and would particularly like to commend the City Council’s sensitive handling of the thorny problem of gypsy and traveller sites and the seemingly sensible solution it has reached.

#### Item Question  
**Council Responses**

13  
**Council Response**

Support noted.

---

**Accession No:** 3814.L2/General  
**Agent:** Saunders, Peter & Teresa  
**Date Lodged:** 23/07/2013  
**Late:** P  
**Source:** S  
**Type:** M  
**Status Modified:** M
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Document: Revised LDP, p.75
Policy: H15.01
Summary: Objection to proposed Transit Gypsy site at Celtic Way.
Following consultation with the community I/we write within the Consultation Period due to expire at 5pm 26th July 2013 to object to the proposal for a Gypsy / Traveller transit site at Celtic Way, Coedkernew, Newport. My/our objections are detailed below:

Business

Objective 3 of the LDP states “to enable a diverse economy that meets the needs of the people of Newport and those of the wider South East Wales economic region”. I / we do not consider the LDP meets the criteria in locating the Gypsy / Traveller transit site at Celtic Way and is in fact contradictory to the LDP as follows;

•Section 6.5 (page 78) states that “there is a medium sized prestige business park development can be supported at Duffryn”.
•Section 6.6 (page 79) states “there is a large scale strategic development area well connected to the M4, containing some of the most prestigious developments in Newport...there are some areas of potential development on this prestigious site”.
•Section 2.67 (page 33) “the sites in west Newport are close to major arterial routes which make them well connected nationally, regionally and locally. Substantial development has already occurred in the area...business advantages in locating near to similar uses”.

Newport is an economically deprived area and we are fortunate to have attracted some major employers to the Celtic Springs and Imperial Park Business Parks for which there were compulsory purchases of land to acquire the full site for the LG Development (Wales Audit Office Protecting Public Money in the LG Project, Newport 13th March 2007 p26). This is a Tier 2 Government funded area that attracts companies to S.E.Wales, bringing jobs and rate payers. I/we are concerned that the existing local businesses have suggested that they would have to seriously consider plans for future expansion and potentially even consider relocating with the loss of employment and resulting in a significant impact on the local economy.

John McCooney the Finance Director for Quinn Radiator made it very clear at the LDP presentation with NCC on Tuesday 9th July that it would prove very difficult for him to justify and support an expansion to the existing business alongside a Travellers transit site. It is likely to prevent, under the same premise, new businesses being attracted to the area and would have a negative impact on employment, local economy and on NCC funding. There remain vacant buildings and sites available for occupation and it is important that NCC retain the highest quality business environment in order that Newport and S.E Wales may attract further high quality corporate investors.

The proposal to allocate the land at Celtic Way for a proposed Gypsy / Traveller Site demonstrates a significant inconsistency with national and regional planning policy.

Health and Safety

The Welsh Government states clearly in their document Designing Gypsy and Traveller sites Good Practise Guide 2008 the following;

•Section 3.1 (page 14) “It is essential to ensure that the location of a site will provide a safe environment for the residents. Sites should not be situated near...industrial processes or other hazardous places...to ensure health and safety of prospective residents is not at risk”.
•Section 8.4 (page 44) “the presence of children on the site and potential health and safety risk for them and other residents should receive equal consideration for transit sites”.
•Section 3.10 (page 15) “sites adjacent to light industrial areas therefore tend not to be popular...because of safety fears”.

I/we feel the proposed site at Celtic Way does not satisfy the above criteria as follows;

•24/7 access of HGV, commercial and employee vehicles to existing commercial premises.
•No pavements so pedestrian access is via a road with a 40 mph speed limit. This could be an issue for access to healthcare facilities, bus routes and local supermarket.
•The road and surrounding areas have poor street lighting and in some areas no streetlighting.
•The area is known locally as ‘Celtic Lakes’ with 13 areas of open water within 680m with a total surface water area of 38276m2. The nearest being only 22m away from the proposed site.
•There are also 3.6 miles of reens and drainage ditches within 0.5 miles.
•The LDP proposes developments of the business park and surrounding infrastructure upto 2026. Primarily the SDR extension and major redevelopment of M4 Junction 28 would make the immediate area a constant ‘construction site’ posing a further hazard to vulnerable people in portable accommodation as they travel within traffic management systems with additional heavy plant and live within a dust and noise polluted environment.

In addition to these points, the Gwent Police Report within the Gypsy and Traveller Site: Site Appraisal and Scrutiny Review appendix 4 (page 46) referencing the proposed site states “…this site would not be appropriate for children unless they are confined within the boundary of the site, due to the volume of traffic and heavy goods vehicles in this area...children playing outside the boundary would be
in danger and could be disruptive to the flow of traffic” which I feel would be a significant risk in such an area. Therefore based on the Gwent Police Report the proposed ‘soft landscape boundaries’ and without permanently closed gates it would be impossible to protect children within the Transit Site from inadvertently wandering into any number of the hazardous areas we have referenced above.

Education

I/we also identify that the Gypsy and Traveller Site; Site Appraisal and Scrutiny Review Guide says that schooling is required for all Gypsy / Traveller children. However having reviewed Newport Government schools admission figures for September 2013 all schools within 3 miles radius of the proposed site at Celtic Way are full. However, schools within the catchment area of the proposed sites at Ringland and A449 have vacancies for 2013. whilst we recognise that 2013 admissions would not be relevant, the assumption is that admissions figures will likely follow this trend in the coming years.

Environment

Within the Gypsy and Traveller Site; Site Appraisal and Scrutiny Review Guide appendix 4 (page 46) the Gwent Police Report raises concerns for “unauthorised expansion onto the unoccupied land to the east of the site. Unoccupied land to the south of the site and across Duffryn Lane could also be vulnerable to unauthorised use”. As the Travellers are unfamiliar with the area, they may not be aware that their immediate surroundings are an SSSI and floodplain. The prospect of unauthorised expansion could have a serious environmental impact on the SSSI and without clear management plans I am unable to comment on how the NCC expect to contain expansion and prevent pollution and a negative impact on the precious drainage water ways of Celtic Lakes and wider Severn Basin.

Conclusion

I/we believe the detailed objections above are valid reasons why the proposed site at Celtic Way does not comply with the Welsh Government Gypsy Traveller Good Practice Guide.

I/we strongly oppose a deadline of 5pm 26th July 2013 for public consultation on a proposal and supporting document, which lacks sufficient detail including management, security and health & safety assessments.

Please be informed that as a community, we are taking professional advice regarding our legal rights under the Localism Act 2011 and will respond in due course. We are also obtaining information supporting our objections under the Freedom of Information Act from multiple parties including the Newport County Council, the Welsh Government, the Gwent Police Authority and the South Wales Fire and Rescue Service. This information clearly will not be available prior to the deadline for the public consultation, but will be presented should further public consultations and hearings be held regarding to the proposed Gypsy / Traveller transit site at Celtic Way.
It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

The proposal is for a transit site providing temporary short-term accommodation, rather than a permanent place to live. In this context, the adjacent land uses to the Celtic Way site are not considered to be hazardous, however it is agreed that they are not suitable places for children to play. The indicative layout of the transit site will include green areas for play and therefore children will have onsite facilities.

The site will be designed as a transit site and therefore only used by Gypsy/Travellers on a temporary basis as they pass through Newport. It is expected that the Gypsy/Travellers will use their vehicles to move around and there will be limited activity in terms of moving around the area on foot. Therefore the fact there is poor street lighting and a lack of pavement is not considered to be a significant concern. Increased street lighting could be provided if Members consider it to be essential.

As this site will only be a transit site for Gypsy/Travellers to temporarily stay, it is unlikely they will seek school places for their children.

The transit site will be clearly defined, maintained and managed. Any unauthorised expansion onto the SSSI is likely to be dealt with swiftly with Police action, who will be able to move on unauthorised encampments once the Council has a transit site.
### Representation Details

**Representor:** Smith, Mr Albert  
**Document:** Revised LDP, p.75  
**Policy:** H15.02  
**Summary:** Support use of Transit site at Ringland Allotment over site proposed at Celtic Way.

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<th>Item Question</th>
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| 11            | Alternative Appropriate Sites  
Those that attended the NCC LDP presentation were invited to propose alternative sites. I/we consider that there are 2 such sites which have already had a sustainability appraisal and I/we better meet the criteria for Gypsy Traveller Transit sites;  
Ringland Allotments  
Unlike the land at Celtic Way, this site is owned by NCC and therefore no negotiation of commercial transaction would be required. Within Welsh Government Gypsy Traveller Good Practice Guide section 3.2 (page 44), it states that transit sites have been “successful where transit sites are…provided adjacent to the main site”. This site is on the main identified transit route and there would be financial gains to be made in terms of reduced management costs, police surveillance, waste collection, and mains service provision as a result of both sites being situated in the same location. I/we feel this is vitally important as it would support the local authorities duty of careful of tax payer’s money. |
| 12            | Speaking at Public Examination  
Yes |

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<th>Item Question</th>
<th>Council Responses</th>
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| 13            | Council Response  
Noted. However, it should be noted that the Former Allotment site is approximately 1,600 metres from the proposed Hartridge Farm residential site. |
Item Question  | Representation Text
---|---
A449 | Again, this site is owned by NCC and has been identified within the Gypsy and Traveller Site; Site Appraisal and Scrutiny Review by Travellers as being an "excellent transit site" that is "close to main travelling route". They also highlighted that it was fine for short stays but not a location that would encourage people to stay beyond their allotted time. In addition "it is already fenced and gated" (noted in Stage 2 comments in the criteria table). This is a criterion for a Transit site and would prevent unauthorised expansion. This is in contrast to the comparative report for Celtic Way, which highlighted concerns by Gwent Police for "unauthorised expansion" onto the unoccupied land to the east and south of the proposed site. It is also noted that the A449 site location was "not highly visibly prominent" Report – Scrutiny Consultation 29/10/10 (page 5 section 14 iii) and this site would have minimal impact on local commercial and residential properties.

The LDP June 2013 Assessment Table of the proposed site at A449 under heading vehicular access issues raises no access issues which contradicts the information provided at the LDP Presentation on the revised LDP as to why the A449 was removed from the LDP.

NCC presented issues regards to speed on the A449 however this could be resolved by introducing variable speed limits during the arrival of Travellers. This is currently successfully adopted for major event management. Furthermore although we recognise that the southbound access is only 185 yards from the merge nose (75 yards), Northbound the slip road leaving the A449 is 420 yards long (stopping sight distance) to merge nose which adds a further 75 yards to the full length of the slip road (total of 495). I/we would also note that the A449 has numerous parking bays used on a daily basis by HGV’s, cars and towing vehicles. None of these bays have a slip road or traffic calming measures but are deemed acceptable.

It would appear the A449 proposal was deleted from the LDP based on a Brief Desk Top Study noted in the “brief desk top assessment of the proposals, comments may alter on completion of a detailed site assessment and are therefore given without prejudice”. The site at A449 already has existing water and sewage facilities, which would once again support the local authority’s duty of careful management of tax payer’s money. We strongly advise NCC to review the criteria and reasons as to why the A449 was deleted from the LDP with a view of reinstating it as the preferred location.

Item Question  | Council Responses
---|---
Speaking at Public Examination | Yes

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
**Representation Details**

*by:* (No grouping)

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Document: Revised LDP, p.75

Policy: General G&T

Summary: Support the Gypsy and Traveller site allocations.

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<td>Having been made aware of the revisions to the plan and in particular reference to the location of Gypsy and Traveller sites as set out in the plan, is acceptable, and I accept and approve the Revised Deposit Local Development Plan.</td>
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**Representation Details**

**Representor**: Griffiths, Mrs A L

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**Document**: Revised LDP, p.22

**Policy**: SP08

**Summary**: Extend SLA boundary north of Langstone.

**Item Question** Representation Text

However, further improvement could be made to the Plan in protecting Langstone village from further major development by adding Countryside north of the A48 that is outside of the boundary settlement, up to and including Old Roman Road, and designate it as a special Landscaped Area.

**Item Question** Council Responses

The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales’ guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.
I am writing to state my objection to the proposed Gypsy and Traveller site at Hartridge Farm Road Newport.

There are numerous reasons why and these have been expressed on many occasions by the Ringland Matters Group of which I have been an active participant.

But, let me give you a personal reason which of course I know will dismissed by the phrase, "There is no evidence to support the fact that the Gypsy and Traveller site will affect the value of adjacent properties". Note the close proximity of my property to the proposed development.

I am in my sixtieth year and will not be able to manage my property as a more elderly person, so was planning to downsize in the coming years.

Common sense says that my property is unmarketable if the plan goes ahead.

Mr Hand, I understand your predicament in finding somewhere to accommodate every type of resident of N.C.C and addressing their rights under E.C. legislation.

Now what of my rights as long standing rate payer to N.C.C? Does N.C.C. intend to help me and my plans for my latter years?

The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.
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Document: Revised LDP, p.75  
Policy: General G&T  
Summary: Support Plan with particular reference to location of proposed Gypsy and Traveller sites.

**Item Question** | **Representation Text**
------------------|-----------------------------------------------
11 11 | Having been made aware of the revisions to the above plan and in particular reference to the location of the Gypsy and Traveller sites as set out in the plan, is acceptable, and I accept and approve the Revised Deposit Local Development Plan.

**Item Question** | **Council Responses**
------------------|-----------------------------------------------
13 13 | Support noted.

12/02/2014 | Page 1103 of 1581
However, further improvement could be made to the Plan in protecting Langstone village from further major development by adding the Countryside north of the A48 that is outside of the boundary settlement, up to and including Old Roman Road, and designate it as a 'Special Landscaped Area'.

The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales’ guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.
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Document: Revised LDP, p.75
Policy: General G&T
Summary: Support Plan with particular reference to proposed Gypsy and Traveller sites.

**Item Question**

**Representation Text**

11 Representation
Having been made aware of the revisions to the above plan and in particular reference to the location of the Gypsy and Traveller sites as set out in the plan, is acceptable, and I accept and approve the Revised Deposit Local Development Plan.

**Item Question**

**Council Responses**

13 Council Response
Support noted.
However, further improvement could be made to the Plan in protecting Langstone village from further major development by adding the Countryside north of the A48 that is outside of the boundary settlement, up to and including Old Roman Road, and designate it as a 'Special Landscaped Area'.

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Document: Revised LDP, p.75

Policy: H15.01

Summary: Object to proposed Gypsy and Traveller transit site at Celtic Way

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**Item Question**  **Representation Text**
## Representation Details

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<td>Following consultation with the community</td>
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Following consultation with the community I/we write within the Consultation Period due to expire at 5pm 26th July 2013 to object to the proposal for a Gypsy / Traveller transit site at Celtic Way, Coedkernew, Newport. My/our objections are detailed below:

### Business

Objective 3 of the LDP states “to enable a diverse economy that meets the needs of the people of Newport and those of the wider South East Wales economic region”. I / we do not consider the LDP meets the criteria in locating the Gypsy / Traveller transit site at Celtic Way and is in fact contradictory to the LDP as follows;

- Section 6.5 (page 78) states that “there is a medium sized prestige business park development can be supported at Duffryn”.
- Section 6.6 (page 79) states “there is a large scale strategic development area well connected to the M4, containing some of the most prestigious developments in Newport...there are some areas of potential development on this prestigious site”.
- Section 2.67 (page 33) “the sites in west Newport are close to major arterial routes which make them well connected nationally, regionally and locally. Substantial development has already occurred in the area...business advantages in locating near to similar uses”.

Newport is an economically deprived area and we are fortunate to have attracted some major employers to the Celtic Springs and Imperial Park Business Parks for which there were compulsory purchases of land to acquire the full site for the LG Development (Wales Audit Office Protecting Public Money in the LG Project, Newport 13th March 2007 p26). This is a Tier 2 Government funded area that attracts companies to S.E.Wales, bringing jobs and rate payers. I/we are concerned that the existing local businesses have suggested that they would have to seriously consider plans for future expansion and potentially even consider relocating with the loss of employment and resulting in a significant impact on the local economy.

John McCooney the Finance Director for Quinn Radiator made it very clear at the LDP presentation with NCC on Tuesday 9th July that it would prove very difficult for him to justify and support an expansion to the existing business alongside a Travellers transit site. It is likely to prevent, under the same premise, new businesses being attracted to the area and would have a negative impact on employment, local economy and on NCC funding. There remain vacant buildings and sites available for occupation and it is important that NCC retain the highest quality business environment in order that Newport and S.E Wales may attract further high quality corporate investors.

The proposal to allocate the land at Celtic Way for a proposed Gypsy / Traveller Site demonstrates a significant inconsistency with national and regional planning policy.

### Health and Safety

The Welsh Government states clearly in their document Designing Gypsy and Traveller sites Good Practise Guide 2008 the following;

- Section 3.1 (page 14) “It is essential to ensure that the location of a site will provide a safe environment for the residents. Sites should not be situated near...industrial processes or other hazardous places...to ensure health and safety of prospective residents is not at risk”.
- Section 8.4 (page 44) “the presence of children on the site and potential health and safety risk for them and other residents should receive equal consideration for transit sites”.
- Section 3.10 (page 15) “sites adjacent to light industrial areas therefore tend not to be popular...because of safety fears”.

I/we feel the proposed site at Celtic Way does not satisfy the above criteria as follows;

- 24/7 access of HGV, commercial and employee vehicles to existing commercial premises.
- No pavements so pedestrian access is via a road with a 40 mph speed limit. This could be an issue for access to healthcare facilities, bus routes and local supermarket.
- The road and surrounding areas have poor street lighting and in some areas no streetlighting.
- The area is known locally as ‘Celtic Lakes’ with 13 areas of open water within 680m with a total surface water area of 38276m2. The nearest being only 22m away from the proposed site.
- There are also 3.6 miles of drains and drainage ditches within 0.5 miles.
- The LDP proposes developments of the business park and surrounding infrastructure upto 2026. Primarily the SDR extension and major redevelopment of M4 Junction 28 would make the immediate area a constant ‘construction site’ posing a further hazard to vulnerable people in portable accommodation as they travel within traffic management systems with additional heavy plant and live within a dust and noise polluted environment.

In addition to these points, the Gwent Police Report within the Gypsy and Traveller Site: Site Appraisal and Scrutiny Review appendix 4 (page 46) referencing the proposed site states “…this site would not be appropriate for children unless they are confined within the boundary of the site, due to the volume of traffic and heavy goods vehicles in this area...children playing outside the boundary would be
Representation Details

**by:** (No grouping)

Filtered to show: (all of) Stage=L; Status=M

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in danger and could be disruptive to the flow of traffic” which I feel would be a significant risk in such an area. Therefore based on the Gwent Police Report the proposed ‘soft landscape boundaries’ and without permanently closed gates it would be impossible to protect children within the Transit Site from inadvertently wandering into any number of the hazardous areas we have referenced above.

Education

I/we also identify that the Gypsy and Traveller Site; Site Appraisal and Scrutiny Review Guide says that schooling is required for all Gypsy / Traveller children. However having reviewed Newport Government schools admission figures for September 2013 all schools within 3 miles radius of the proposed site at Celtic Way are full. However, schools within the catchment area of the proposed sites at Ringland and A449 have vacancies for 2013. whilst we recognise that 2013 admissions would not be relevant, the assumption is that admissions figures will likely follow this trend in the coming years.

Environment

Within the Gypsy and Traveller Site; Site Appraisal and Scrutiny Review Guide appendix 4 (page 46) the Gwent Police Report raises concerns for “unauthorised expansion onto the unoccupied land to the east of the site. Unoccupied land to the south of the site and across Duffryn Lane could also be vulnerable to unauthorised use”. As the Travellers are unfamiliar with the area, they may not be aware that their immediate surroundings are an SSSI and floodplain. The prospect of unauthorised expansion could have a serious environmental impact on the SSSI and without clear management plans I am unable to comment on how the NCC expect to contain expansion and prevent pollution and a negative impact on the precious drainage water ways of Celtic Lakes and wider Severn Basin.

Conclusion

I/we believe the detailed objections above are valid reasons why the proposed site at Celtic Way does not comply with the Welsh Government Gypsy Traveller Good Practice Guide.

I/we strongly oppose a deadline of 5pm 26th July 2013 for public consultation on a proposal and supporting document, which lacks sufficient detail including management, security and health & safety assessments.

Please be informed that as a community, we are taking professional advice regarding our legal rights under the Localism Act 2011 and will respond in due course. We are also obtaining information supporting our objections under the Freedom of Information Act from multiple parties including the Newport County Council, the Welsh Government, the Gwent Police Authority and the South Wales Fire and Rescue Service. This information clearly will not be available prior to the deadline for the public consultation, but will be presented should further public consultations and hearings be held regarding to the proposed Gypsy / Traveller transit site at Celtic Way.

<table>
<thead>
<tr>
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</tr>
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<tr>
<td>Speaking at Public Examination</td>
<td>Yes</td>
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12/02/2014
Representation Details

Council Response

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council's duty and enabling the Police to use its powers to move on other unauthorised encampments.

The proposal is for a transit site providing temporary short-term accommodation, rather than a permanent place to live. In this context, the adjacent land uses to the Celtic Way site are not considered to be hazardous, however it is agreed that they are not suitable places for children to play. The indicative layout of the transit site will include green areas for play and therefore children will have onsite facilities.

The site will be designed as a transit site and therefore only used by Gypsy/Travellers on a temporary basis as they pass through Newport. It is expected that the Gypsy/Travellers will use their vehicles to move around and there will be limited activity in terms of moving around the area on foot. Therefore the fact there is poor street lighting and a lack of pavement is not considered to be a significant concern. Increased street lighting could be provided if Members consider it to be essential.

As this site will only be a transit site for Gypsy/Travellers to temporarily stay, it is unlikely they will seek school places for their children.

The transit site will be clearly defined, maintained and managed. Any unauthorised expansion onto the SSSI is likely to be dealt with swiftly with Police action, who will be able to move on unauthorised encampments once the Council has a transit site.
3820.L2/H16.02 Perry, A

Document: Revised LDP, p.76
Policy: H16.02
Summary: Support proposed site at Ringland Allotments as an alternative to Celtic Way

Item Question Representation Text
11 Representation
   Alternative Appropriate Sites

   Those that attended the NCC LDP presentation were invited to propose alternative sites. I/we consider that there are 2 such sites (Ringland Allotments and A449 rep 3820.L3) which have already had a sustainability appraisal and I/we better meet the criteria for Gypsy Traveller Transit sites;

   Ringland Allotments

   Unlike the land at Celtic Way, this site is owned by NCC and therefore no negotiation of commercial transaction would be required. Within Welsh Government Gypsy Traveller Good Practice Guide section 3.2 (page 44), it states that transit sites have been “successful where transit sites are...provided adjacent to the main site”. This site is on the main identified transit route and there would be financial gains to be made in terms of reduced management costs, police surveillance, waste collection, and mains service provision as a result of both sites being situated in the same location. I/we feel this is vitally important as it would support the local authorities duty of careful of tax payer’s money.

Item Question Council Responses
12 Speaking at Public Examination
   Yes
**Council Response**

Former Ringland allotments, taken together, have been identified as a contingency site for transit accommodation.

The following points address concerns regarding the proposed transit site at Celtic Way:

- **Location and Design** – The proposal is for a transit site providing temporary short-term accommodation, rather than a permanent place to live. In this context, the adjacent land uses to the Celtic Way site are not considered to be hazardous, however it is agreed that they are not suitable places for children to play. The indicative layout of the transit site will include green areas for play and therefore children will have onsite facilities.

- **24/7 access of HGV/movement of employees** – The site will be designed as a transit site and therefore only used by Gypsy/Travellers on a temporary basis as they pass through Newport. It is expected that the Gypsy/Travellers will use their vehicles to move around and there will be limited activity in terms of moving around the area on foot. Therefore the fact there is poor street lighting and a lack of pavement is not considered to be a significant concern. Increased street lighting could be provided if Members consider it to be essential.

- **Cardiff to Newport dual carriageway is within 0.5 miles** – The fact a main transport route is in close proximity to the site is considered more of an asset than a safety risk. There are numerous homes within Newport which are within 0.5 miles of a dual carriageway or motorway.

- **Crime/Perception of Crime** – As with any other significant development, the Council has liaised with the police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the police if any incidents of crime that relate to the site are reported.

- **Alternative Sites** – Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
**Representation Details**

**Document:** Revised LDP, p.75

**Policy:** General G&T

**Summary:** Propose two new alternative Transit Gypsy and Traveller sites at A449 and Tredegar House Caravan Park.

**Item Question Representation Text**

11 11 Representation

**A449**

Again, this site is owned by NCC and has been identified within the Gypsy and Traveller Site; Site Appraisal and Scrutiny Review by Travellers as being an "excellent transit site" that is "close to main travelling route". They also highlighted that it was fine for short stays but not a location that would encourage people to stay beyond their allotted time. In addition "it is already fenced and gated" (noted in Stage 2 comments in the criteria table). This is a criterion for a Transit site and would prevent unauthorised expansion. This is in contrast to the comparative report for Celtic Way, which highlighted concerns by Gwent Police for "unauthorised expansion" onto the unoccupied land to the east and south of the proposed site. It is also noted that the A449 site location was "not highly visibly prominent" Report – Scrutiny Consultation 29/10/10 (page 5 section 14 iii) and this site would have minimal impact on local commercial and residential properties.

The LDP June 2013 Assessment Table of the proposed site at A449 under heading vehicular access issues raises no access issues which contradicts the information provided at the LDP Presentation on the revised LDP as to why the A449 was removed from the LDP.

NCC presented issues regards to speed on the A449 however this could be resolved by introducing variable speed limits during the arrival of Travellers. This is currently successfully adopted for major event management. Furthermore although we recognise that the southbound access is only 185 yards from the merge nose (75 yards), Northbound the slip road leaving the A449 is 420 yards long (stopping sight distance) to merge nose which adds a further 75 yards to the full length of the slip road (total of 495). I/we would also note that the A449 has numerous parking bays used on a daily basis by HGV’s, cars and towing vehicles. None of these bays have a slip road or traffic calming measures but are deemed acceptable.

It would appear the A449 proposal was deleted from the LDP based on a Brief Desk Top Study noted in the “brief desk top assessment of the proposals, comments may alter on completion of a detailed site assessment and are therefore given without prejudice”. The site at A449 already has existing water and sewage facilities, which would once again support the local authority’s duty of careful management of tax payer’s money. We strongly advise NCC to review the criteria and reasons as to why the A449 was deleted from the LDP with a view of reinstating it as the preferred location.

**Tredegar House Caravan Park**

In addition to the existing proposed sites, I/we would also like to propose an additional suitable site. The site, on the west site of Newport is owned by NCC and is 960m from the proposed Celtic Way site and meets all criteria required for a Gypsy / Traveller transit site as presented by the local planning department at the LDP presentation. This managed and secure site can be offered, ensuring no discrimination to the Travelling Community and at no additional expense to Newport Council or to tax payers. By identifying this site, the council will then have leverage to immediately move on any illegal encampment within Newport without extensive and costly legal implications.

12 12 Speaking at Public Examination

Yes

**Council Response**

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
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Document: Revised LDP, p.75

Policy: H15.01

Summary: Objection to proposed transit Gypsy and Traveller site at Celtic Way.
Following consultation with the community I/we write within the Consultation Period due to expire at 5pm 26th July 2013 to object to the proposal for a Gypsy / Traveller transit site at Celtic Way, Coedkernew, Newport. My/our objections are detailed below:

Objective 3 of the LDP states “to enable a diverse economy that meets the needs of the people of Newport and those of the wider South East Wales economic region”. I / we do not consider the LDP meets the criteria in locating the Gypsy / Traveller transit site at Celtic Way and is in fact contradictory to the LDP as follows;

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The proposal to allocate the land at Celtic Way for a proposed Gypsy / Traveller Site demonstrates a significant inconsistency with national and regional planning policy.

Health and Safety
The Welsh Government states clearly in their document Designing Gypsy and Traveller sites Good Practise Guide 2008 the following;

- Section 3.1 (page 14) “It is essential to ensure that the location of a site will provide a safe environment for the residents. Sites should not be situated near...industrial processes or other hazardous places...to ensure health and safety of prospective residents is not at risk”.
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I/we feel the proposed site at Celtic Way does not satisfy the above criteria as follows;

- 24/7 access of HGV, commercial and employee vehicles to existing commercial premises.
- No pavements so pedestrian access is via a road with a 40 mph speed limit. This could be an issue for access to healthcare facilities, bus routes and local supermarket.
- The road and surrounding areas have poor street lighting and in some areas no streetlighting.
- The area is known locally as ‘Celtic Lakes’ with 13 areas of open water within 680m with a total surface water area of 38276m2. The nearest being only 22m away from the proposed site.
- There are also 3.6 miles of reens and drainage ditches within 0.5 miles.
- The LDP proposes developments of the business park and surrounding infrastructure upto 2026. Primarily the SDR extension and major redevelopment of M4 Junction 28 would make the immediate area a constant ‘construction site’ posing a further hazard to vulnerable people in portable accommodation as they travel within traffic management systems with additional heavy plant and live within a dust and noise polluted environment.

In addition to these points, the Gwent Police Report within the Gypsy and Traveller Site: Site Appraisal and Scrutiny Review appendix 4 (page 46) referencing the proposed site states “…this site would not be appropriate for children unless they are confined within the boundary of the site, due to the volume of traffic and heavy goods vehicles in this area...children playing outside the boundary would be
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Education

I/we also identify that the Gypsy and Traveller Site; Site Appraisal and Scrutiny Review Guide says that schooling is required for all Gypsy / Traveller children. However having reviewed Newport Government schools admission figures for September 2013 all schools within 3 miles radius of the proposed site at Celtic Way are full. However, schools within the catchment area of the proposed sites at Ringland and A449 have vacancies for 2013. whilst we recognise that 2013 admissions would not be relevant, the assumption is that admissions figures will likely follow this trend in the coming years.

Environment

Within the Gypsy and Traveller Site; Site Appraisal and Scrutiny Review Guide appendix 4 (page 46) the Gwent Police Report raises concerns for “unauthorised expansion onto the unoccupied land to the east of the site. Unoccupied land to the south of the site and across Duffryn Lane could also be vulnerable to unauthorised use”. As the Travellers are unfamiliar with the area, they may not be aware that their immediate surroundings are an SSSI and floodplain. The prospect of unauthorised expansion could have a serious environmental impact on the SSSI and without clear management plans I am unable to comment on how the NCC expect to contain expansion and prevent pollution and a negative impact on the precious drainage water ways of Celtic Lakes and wider Severn Basin.

Conclusion

I/we believe the detailed objections above are valid reasons why the proposed site at Celtic Way does not comply with the Welsh Government Gypsy Traveller Good Practice Guide.

I/we strongly oppose a deadline of 5pm 26th July 2013 for public consultation on a proposal and supporting document, which lacks sufficient detail including management, security and health & safety assessments.

Please be informed that as a community, we are taking professional advice regarding our legal rights under the Localism Act 2011 and will respond in due course. We are also obtaining information supporting our objections under the Freedom of Information Act from multiple parties including the Newport County Council, the Welsh Government, the Gwent Police Authority and the South Wales Fire and Rescue Service. This information clearly will not be available prior to the deadline for the public consultation, but will be presented should further public consultations and hearings be held regarding to the proposed Gypsy / Traveller transit site at Celtic Way.

12/02/2014
Council Response

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

The proposal is for a transit site providing temporary short-term accommodation, rather than a permanent place to live. In this context, the adjacent land uses to the Celtic Way site are not considered to be hazardous, however it is agreed that they are not suitable places for children to play. The indicative layout of the transit site will include green areas for play and therefore children will have onsite facilities.

The site will be designed as a transit site and therefore only used by Gypsy/Travellers on a temporary basis as they pass through Newport. It is expected that the Gypsy/Travellers will use their vehicles to move around and there will be limited activity in terms of moving around the area on foot. Therefore the fact there is poor street lighting and a lack of pavement is not considered to be a significant concern. Increased street lighting could be provided if Members consider it to be essential.

As this site will only be a transit site for Gypsy/Travellers to temporarily stay, it is unlikely they will seek school places for their children.

The transit site will be clearly defined, maintained and managed. Any unauthorised expansion onto the SSSI is likely to be dealt with swiftly with Police action, who will be able to move on unauthorised encampments once the Council has a transit site.
### Document: Revised LDP, p.76

**Policy:** H16.02  
**Summary:** Support a proposed alternative of a Transit site at Ringland Allotment.

<table>
<thead>
<tr>
<th>Item</th>
<th>Question</th>
<th>Representation Text</th>
</tr>
</thead>
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<td>11</td>
<td>Alternative Appropriate Sites</td>
<td>Those that attended the NCC LDP presentation were invited to propose alternative sites. I/we consider that there are 2 such sites (Former Ringland Allotments and A449 - 3821.L3) which have already had a sustainability appraisal and I/we better meet the criteria for Gypsy Traveller Transit sites;</td>
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**Item Question**  
**Council Responses**
Former Ringland allotments, taken together, have been identified as a contingency site for transit accommodation.

The following points address concerns regarding the proposed transit site at Celtic Way:

Location and Design – The proposal is for a transit site providing temporary short-term accommodation, rather than a permanent place to live. In this context, the adjacent land uses to the Celtic Way site are not considered to be hazardous, however it is agreed that they are not suitable places for children to play. The indicative layout of the transit site will include green areas for play and therefore children will have onsite facilities.

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Alternative Sites – Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
Representation Details
by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M

Rep'n/Para/Policy     Representor                                                                      Agent              Accession No    Date Lodged    Late?   Source   Type    Mode     Status     Status Modified
3821.L3//General     Rundle, Ms & Mr R                                                                                           23/07/2013

Document: Revised LDP, p.75
Policy: General G&T
Summary: Propose two alternative transit sites at A449 and Tredegar Park Caravan Site.

11  Representation
A449

Again, this site is owned by NCC and has been identified within the Gypsy and Traveller Site; Site Appraisal and Scrutiny Review by Travellers as being an "excellent transit site" that is "close to main travelling route". They also highlighted that it was fine for short stays but not a location that would encourage people to stay beyond their allotted time. In addition "it is already fenced and gated" (noted in Stage 2 comments in the criteria table). This is a criterion for a Transit site and would prevent unauthorised expansion. This is in contrast to the comparative report for Celtic Way, which highlighted concerns by Gwent Police for "unauthorised expansion" onto the unoccupied land to the east and south of the proposed site. It is also noted that the A449 site location was "not highly visibly prominent" Report – Scrutiny Consultation 29/10/10 (page 5 section 14 iii) and this site would have minimal impact on local commercial and residential properties.

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Tredegar House Caravan Park

In addition to the existing proposed sites, I/we would also like to propose an additional suitable site. The site, on the west site of Newport is owned by NCC and is 960m from the proposed Celtic Way site and meets all criteria required for a Gypsy / Traveller transit site as presented by the local planning department at the LDP presentation. This managed and secure site can be offered, ensuring no discrimination to the Travelling Community and at no additional expense to Newport Council or to tax payers. By identifying this site, the council will then have leverage to immediately move on any illegal encampment within Newport without extensive and costly legal implications.

12  Speaking at Public Examination

Yes

13  Council Response

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
### Representation Details

**Stage:** L  **Status:** M

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**Document:** Revised LDP, p.75  
**Policy:** H15.01  
**Summary:** Objection to Celtic Way Transit site

#### Item Question  Council Responses

11 11  Representation

The full consultation comments are available to view against representation reference 3820.L1

12 12  Speaking at Public Examination  
Yes

#### Item Question  Council Responses

13 13  Council Response

The full response is available to view against 3820.L1

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### Representation Details

**Stage:** L  **Status:** M

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**Document:** Revised LDP, p.75  
**Policy:** H15.02  
**Summary:** Support alternative Gypsy and Traveller transit site at Ringland Allotments

#### Item Question  Council Responses

11 11  Representation

The full consultation comments are available to view against representation reference 3820.L2

12 12  Speaking at Public Examination  
Yes

#### Item Question  Council Responses

13 13  Council Response

The Council response to this representation can be found against representation 3820.L2
**Representation Details**

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Document: Revised LDP, p.75

Policy: General G&T

Summary: Propose two alternative sites for transit Gypsy and Traveller site at Ringland Allotments and A449 Site.

**Item Question**  
**Representation Text**

11  Representation

The full consultation comments are available to view against representation reference 3820.L3

12  Speaking at Public Examination

Yes

**Item Question**  
**Council Responses**

13  Council Response

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
### Representation Details

**by:** (No grouping)

Filtered to show: (all of) Stage=L; Status=M

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**Document:** Revised LDP, p.22

**Policy:** SP08  
**Map:** Proposals West: Proposals Plan - West

**Summary:** Amendment of the boundary of the Tredegar Park SLA to exclude the Graig y Saeson site.

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<tr>
<th>Item</th>
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<td>Amend the boundaries of an existing site</td>
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<td>10</td>
<td>Soundness Test</td>
<td>C2, CE2.</td>
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**Soundness Test:**

**Representation:**

Amendment of the boundary of the Tredegar Park SLA to exclude the Graig y Saeson site.

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<tr>
<th>12</th>
<th>Speaking at Public Examination</th>
<th>Yes</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>We wish to discuss the justification for the Tredegar Park SLA and in particular its inclusion of the whole of the Graig y Saeson site. The justification for the allocation may require clarification and debate.</td>
<td></td>
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<thead>
<tr>
<th>Item</th>
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<th>Tick-box reply</th>
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<tbody>
<tr>
<td>2</td>
<td>Soundness of LDP</td>
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**Council Responses**

The designation of Special Landscape Areas was assessed using the Landmap information system, as referenced in PPW, which is the data set used in the overall assessment undertaken using the Special Landscape Area Designation Criteria included within Natural Resources Wales’ guidance. The Local Authority did refine the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken; this included roads, hedgerow as well as settlement boundaries. This work looked at the proposed SLAs identified by the assessment of the Landmap data and did not seek to amend this nationally consistent data set. The area at Graig y Saeson is allocated as part of the SLA 7 Tredegar Park and this is based on the overall value of the landscape taking into account its qualities and features which have been deemed worthy of designation.
### Representation Details

**Document:** Revised LDP, p.75  
**Policy:** H15.01  
**Summary:** Object to proposed site at Celtic Way.

<table>
<thead>
<tr>
<th>Item Question</th>
<th>Representation Text</th>
</tr>
</thead>
</table>
| Representation | I wish to oppose the following aspects of the Newport Local Development Plan:-  
1. The ‘Temporary’ Gypsy/Traveller site on Imperial Way/South Lake Drive near Quinns as the proposed site is in a prime industrial area. I believe planning on the land is for Industrial and Business purposes only. |

<table>
<thead>
<tr>
<th>Item Question</th>
<th>Council Responses</th>
</tr>
</thead>
</table>
| Council Response | Objection noted.  
It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments. |
Representation Details

by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M

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<td>3824.L2//H16.01</td>
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<td></td>
<td>24/07/2013</td>
<td>P</td>
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</table>

Document: Revised LDP, p. 76
Policy: H16.01
Summary: Object to site proposed for Gypsy and Traveller accommodation at Hartridge Farm Road

---

Item Question | Representation Text
---|---
11 11 | Objects to the Hartridge Farm Road Permanent Site as it is very close to two schools.

---

Item Question | Council Responses
---|---
13 13 | The site will be well screened and should not affect Llanwern High School or Ysgol Gymraeg Casnewydd. Perception of Gypsy/Travellers at the School is something that the Council will need to address through interaction with the Head Teacher and Governors. The site, which would contain fewer pitches than Shirenewton in Cardiff, would not be the largest site in the United Kingdom, let alone in Europe.

---

3824.L3//H15.02 | Thomas, Mrs I S | 24/07/2013 | P | M |

Document: Revised LDP, p. 75
Policy: H15.02
Summary: Object to proposed Gypsy site at former Ringland Allotments

---

Item Question | Representation Text
---|---
11 11 | 3. Old Ringland Allotments site on grounds that at present the distributor road past Hartridge School and Ringland is a very pleasing entrance to Newport. Gypsy/Traveller sites are not well known for their tidiness. (I have, however, noticed one tidy site in Wiltshire on the side of the M4 West before Junction 16).

---

Item Question | Council Responses
---|---
13 13 | A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road. The site will be well managed.
### Representation Details

**Document:** Revised LDP, p. 75

**Policy:** General G&T

**Summary:** Support Plan with particular reference to location of proposed Gypsy and Traveller sites.

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<tr>
<th>Item Question</th>
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<tbody>
<tr>
<td>11</td>
<td>Having been made aware of the revisions to the above plan, and in particular reference to the location of the Gypsy and Traveller sites as set out in the plan, I accept and approve the Revised Deposit Local Development Plan.</td>
</tr>
</tbody>
</table>

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<tr>
<th>Item Question</th>
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<tr>
<td>13</td>
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<tr>
<td>3825.L2//SP08</td>
<td>Treen, Mr Paul</td>
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Document: Revised LDP, p.22
Policy: SP08
Summary: Propose amendment to SLA at Langstone.

### Representation

**Representation**

However, further improvement could be made to the Plan in protecting Langstone Village from further major development by adding the countryside north of the A48 that is outside of the boundary settlement, up to and including Old Roman Road and designating it as a "Special Landscaped Area".

### Council Response

The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales' guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.
### Representation Details

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Document: Revised LDP, p.75  
Policy: H15.01  
Summary: Objection to proposed Gypsy Site at Celtic Way.

**Item Question**  
11  
Representation  
The full consultation comments are available to view against representation reference 3820.L1

**Item Question**  
12  
Speaking at Public Examination  
Yes

**Item Question**  
13  
Council Response  
The response can be viewed against 3820.L1
Document: Revised LDP, p.76
Policy: H16.02

Summary: Support use of Former Ringland Allotments as alternative transit site to that proposed at Celtic Way.

**Item Question** Council Responses

The following points address concerns regarding the proposed transit site at Celtic Way:

Location and Design – The proposal is for a transit site providing temporary short-term accommodation, rather than a permanent place to live. In this context, the adjacent land uses to the Celtic Way site are not considered to be hazardous, however it is agreed that they are not suitable places for children to play. The indicative layout of the transit site will include green areas for play and therefore children will have onsite facilities.

24/7 access of HGV/movement of employees – The site will be designed as a transit site and therefore only used by Gypsy/Travellers on a temporary basis as they pass through Newport. It is expected that the Gypsy/Travellers will use their vehicles to move around and there will be limited activity in terms of moving around the area on foot. Therefore the fact there is poor street lighting and a lack of pavement is not considered to be a significant concern. Increased street lighting could be provided if Members consider it to be essential.

Cardiff to Newport dual carriageway is within 0.5 miles – The fact a main transport route is in close proximity to the site is considered more of an asset than a safety risk. There are numerous homes within Newport which are within 0.5 miles of a dual carriageway or motorway.

Crime/Perception of Crime – As with any other significant development, the Council has liaised with the police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the police if any incidents of crime that relate to the site are reported.

Alternative Sites – Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
### Representation Details

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Document: Revised LDP, p.75
Policy: General G&T
Summary: Proposed alternative transit Gypsy site at A449 and Tredegar Park Caravan Club.

**Item Question Representation Text**

11 11 Representation
The full consultation comments are available to view against representation reference 3820.L3.

12 12 Speaking at Public Examination
Yes

**Item Question Council Responses**

13 13 Council Response
Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

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Document: Revised LDP, p.75
Policy: H15.01
Summary: Objection to the proposed Gypsy and Traveller site at Celtic Way.

**Item Question Representation Text**

11 11 Representation
The full consultation comments are available to view against representation reference 3820.L1.

12 12 Speaking at Public Examination
Yes

**Item Question Council Responses**

13 13 Council Response
The response can be viewed against 3820.L1
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**Document:** Revised LDP, p.75  
**Policy:** H15.02  
**Summary:** Support alternative transit Gypsy and Traveller site at Former Ringland Allotments instead of Celtic Way.

**Item Question**  
**Representation Text**  
- The full consultation comments are available to view against representation reference 3820.L2.

**Council Response**  
- Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

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12/02/2014  
Page 1131 of 1581
### Representation Details

**Document:** Revised LDP, p.75  
**Policy:** H15.01  
**Summary:** Object to proposed transit site on Celtic Way.

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### Item Question  Representation Text

**11 11 Representation**

The full consultation comments are available to view against representation reference 3820.L2.

---

**12 12 Speaking at Public Examination**

Yes

---

### Item Question  Council Responses

**13 13 Council Response**

Former Ringland allotments, taken together, have been identified as a contingency site for transit accommodation.

The following points address concerns regarding the proposed transit site at Celtic Way:

**Location and Design** – The proposal is for a transit site providing temporary short-term accommodation, rather than a permanent place to live. In this context, the adjacent land uses to the Celtic Way site are not considered to be hazardous, however it is agreed that they are not suitable places for children to play. The indicative layout of the transit site will include green areas for play and therefore children will have onsite facilities.

24/7 access of HGV/movement of employees – The site will be designed as a transit site and therefore only used by Gypsy/Travellers on a temporary basis as they pass through Newport. It is expected that the Gypsy/Travellers will use their vehicles to move around and there will be limited activity in terms of moving around the area on foot. Therefore the fact there is poor street lighting and a lack of pavement is not considered to be a significant concern. Increased street lighting could be provided if Members consider it to be essential.

Cardiff to Newport dual carriageway is within 0.5 miles – The fact a main transport route is in close proximity to the site is considered more of an asset than a safety risk. There are numerous homes within Newport which are within 0.5 miles of a dual carriageway or motorway.

**Crime/Perception of Crime** – As with any other significant development, the Council has liaised with the police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the police if any incidents of crime that relate to the site are reported.

**Alternative Sites** – Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
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**Document:** Revised LDP, p.75  
**Policy:** General G&T  
**Summary:** Proposed two new sites at A449 and Tredegar House Caravan Park instead of the proposed site at Celtic Way.

**Item Question**  
**Representation Text**

11 11 Representation  
The full consultation comments are available to view against representation reference 3820.L3.

12 12 Speaking at Public Examination  
**Council Response**  
Support noted.

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**Document:** Revised LDP, p.75  
**Policy:** General G&T  
**Summary:** Support Gypsy and Traveller site allocations in the LDP.

**Item Question**  
**Representation Text**

11 11 Representation  
Having been made aware of the revisions to the above plan and in particular reference to the location of the Gypsy and Traveller sites as set out in the plan, is acceptable, and I accept and approve the Revised Deposit Local Development Plan.

**Item Question**  
**Council Responses**

13 13 Council Response  
Support noted.
Representation Details

Representation

Representation Details

Item Question  Representation Text

However, further improvements could be made to the Plan in protecting Langstone Village from further major development by adding the Countryside north of the A48 that is outside of the boundary settlement, up to and including Old Roman Road, and designate it as a 'Special Landscaped Area'.

Item Question  Council Responses

Council Response

The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales' guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.
### Item Question  Council Responses

<table>
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<th>Item</th>
<th>13</th>
<th>Council Response</th>
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<tbody>
<tr>
<td></td>
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<td>The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales’ guidance. Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.</td>
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Document: Revised LDP, p.75
Policy: General G&T
Summary: Support for Gypsy and Traveller site allocations in the LDP.

**Representation**

11 11 Representation

Having been made aware of the revisions to the above plan and in particular reference to the location of the Gypsy and Traveller sites as set out in the plan, is acceptable, and I accept and the approve the Revised Deposit Local Development Plan.

**Council Response**

13 13 Council Response

Support noted.

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Document: Revised LDP, p.75
Policy: General G&T
Map: Proposals East: Proposals Plan - East
Summary: Support for Gypsy and Traveller site allocations.

**Representation**

11 11 Representation

Having been made aware of the revisions to the above plan and in particular reference to the location of the Gypsy and Traveller sites as set out in the plan, is acceptable, and I accept and the approve the Revised Deposit Local Development Plan.

**Council Response**

13 13 Council Response

Support noted.
Representation Details

3831.L2//SP08  Firman, Ms Kathleen

Policy: SP08  Map: Proposals East: Proposals Plan - East

Summary: Amend boundary of Special Landscape Area to the north of Langstone,

11  Representation

However, further improvements could be made to the Plan in protecting Langstone Village from further major development by adding the Countryside north of the A48 that is outside of the boundary settlement, up to and including Old Roman Road, and designate it as a 'Special Landscaped Area'.

13  Council Response

The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales’ guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.
### Representation Details

**Filtering Details**
- **Rep'n/Para/Policy**: (all of) Stage=L; Status=M
- **Agent**: O I M
- **Accession No**: 3832.L1/H15.01
- **Date Lodged**: 24/07/2013
- **Late?**: No
- **Source**: P O I M
- **Type**: Document: Revised LDP, p.75
- **Mode**: Yes
- **Status**: Policy: H15.01
- **Status Modified**: Summary: Object to the proposed transit site at Celtic Way.

#### Representation Text

**Representation**
The full consultation comments are available to view against representation reference 3820.L1.

**Speaking at Public Examination**
Yes

#### Council Responses

The response can be viewed against representation 3820.L1.

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**Representation Details**

**Filtering Details**
- **Rep'n/Para/Policy**: (all of) Stage=L; Status=M
- **Agent**: O I M
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- **Date Lodged**: 24/07/2013
- **Late?**: No
- **Source**: P O I M
- **Type**: Document: Revised LDP, p.75
- **Mode**: Yes
- **Status**: Policy: H15.02
- **Status Modified**: Summary: Support use of Former Ringland Allotment instead of transit site at Celtic Way.

#### Representation Text

**Representation**
The full consultation comments are available to view against representation reference 3820.L2.

**Speaking at Public Examination**
Yes

#### Council Responses

The Council response to this representation can be found against representation 3820.L2.

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12/02/2014
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**Document:** Revised LDP, p.75

**Policy:** General G&T

**Summary:** Propose two alternative sites A449 and Tredegar House Caravan Park instead of Celtic Way transit site.

**Item Question**

11 11 Representation

The full consultation comments are available to view against representation reference 3820.L3.

**Item Question**

12 12 Speaking at Public Examination

Yes

**Item Question**

13 13 Council Response

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

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**Document:** Revised LDP, p.75

**Policy:** H15.01

**Summary:** Object to proposed transit site at Celtic Way.

**Item Question**

11 11 Representation

The full consultation comments are available to view against representation reference 3820.L1.

**Item Question**

13 13 Council Response

The response can be viewed against 3820.L1
Representation Details

by: (No grouping)
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Rep’n/Para/Policy | Representor | Agent | Accession No | Date Lodged | Late? | Source | Type | Mode | Status | Status Modified
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3833.L2/H16.02 | Jones, Mr G | | 24/07/2013 | ☐ | P | O | M |

Document: Revised LDP, p.76
Policy: H16.02
Summary: Support proposed use of Former Ringland Allotment instead of site at Celtic Way.

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**Item Question** | **Representation Text**
--- | ---
11 11 | The full consultation comments are available to view against representation reference 3820.L2.

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**Item Question** | **Council Responses**
--- | ---
13 13 | Former Ringland allotments, taken together, have been identified as a contingency site for transit accommodation.

The following points address concerns regarding the proposed transit site at Celtic Way:

Location and Design – The proposal is for a transit site providing temporary short-term accommodation, rather than a permanent place to live. In this context, the adjacent land uses to the Celtic Way site are not considered to be hazardous, however it is agreed that they are not suitable places for children to play. The indicative layout of the transit site will include green areas for play and therefore children will have on-site facilities.

24/7 access of HGV/movement of employees – The site will be designed as a transit site and therefore only used by Gypsy/Travellers on a temporary basis as they pass through Newport. It is expected that the Gypsy/Travellers will use their vehicles to move around and there will be limited activity in terms of moving around the area on foot. Therefore the fact there is poor street lighting and a lack of pavement is not considered to be a significant concern. Increased street lighting could be provided if Members consider it to be essential.

Cardiff to Newport dual carriageway is within 0.5 miles – The fact a main transport route is in close proximity to the site is considered more of an asset than a safety risk. There are numerous homes within Newport which are within 0.5 miles of a dual carriageway or motorway.

Crime/Perception of Crime – As with any other significant development, the Council has liaised with the police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the police if any incidents of crime that relate to the site are reported.

Alternative Sites – Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
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**Representation Details**

**Item Question Representation Text**

11 11 Representation

The full consultation comments are available to view against representation reference 3820.L3.

**Item Question Council Responses**

13 13 Council Response

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

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**Representation Details**

**Representation Details**

**Item Question Representation Text**

11 11 Representation

The full consultation comments are available to view against representation reference 3820.L1.

**Item Question Council Responses**

13 13 Council Response

The response can be viewed against 3820.L1

12/02/2014
### Representation Details

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Document: Revised LDP, p.75  
Policy: H15.02  
Summary: Support an alternative site at Former Ringland Allotments instead of site at Celtic Way.

**Item Question**  
Representation  
The full consultation comments are available to view against representation reference 3820.L2.

**Speaking at Public Examination** Yes

**Council Responses**  
The Council response to this representation can be found against representation 3820.L2

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Document: Revised LDP, p.75  
Policy: General G&T  
Summary: Propose two new sites A449 and Tredegar House Caravan Park instead of site at Celtic Way.

**Item Question**  
Representation  
The full consultation comments are available to view against representation reference 3820.L3.

**Speaking at Public Examination** Yes

**Council Responses**  
Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
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Document: Revised LDP, p. 76
Policy: H16
Summary: Objection to Hartridge Farm Road and 'Former Ringland Allotments'
I am writing to register my objection to the Gypsy and Traveller site proposed at Hartridge Farm Road and the ‘Former’ Ringland Allotments

My reasons are as follows:

A. General

1. Timescale: The revision of the traveller sites was given the go ahead on 27 June 2012 with the initial findings released on 6th September 2012 for a four week public consultation. As the initial period (i.e. up to 6th September 2012) included scrutinising some 240+ sites, ‘discussing the drawbacks of very site very carefully, deliberating long and hard before reaching our recommendations’, consulting with travellers and other stakeholders, visiting some 40+ sites, assessing each site against a predetermined criteria. This appears to be an enormous amount of work done over a short amount of time and, as such, the accuracy of any findings produced is questionable.

2. Policy Review Group: The Members of the Policy Review Group was made up of five Councillors i.e.:

Councillor Delahaye (Bettws Ward)
Councillor Morris (Lliswery Ward)
Councillor Suller (Marshfield Ward)
Councillor Watkins (Tredegar Park Ward)
Councillor Hannon (Beechwood Ward)

Of these four could be seen as having a direct interest in the review, both ward based and personal, as follows:

Delahaye - Bettws: One of the original 5 sites was in Bettws but did not appear on the new list of sites. Lives in Celtic Horizon – close to Coedkernew (another of the original sites that did not appear on the new list).

Morris – Lliswerry: Three of the original sites were in Lliswerry but none of them appeared on the new list of sites. He lives in Coedkernew (another of the original sites that did not appear on the new list).

Suller – Marshfield: One of the original 5 sites was in Coedkernew (within the ward of Marshfield) but did not appear on the new list of sites. This site is also within the same postcode district of his home.

Watkins – Tredegar Park: One of the original 5 sites was in Coedkernew (on the border of his ward) but did not appear on the new list of sites. This site is also within the same postcode district of his home.

This list of members demonstrates that the group was highly unlikely to have a balanced opinion in their review. Considering that two of the members are part of a committee that could give them easy access to information regarding flood plains, how is it that this is not recognized on the shortlist? Did they really do the work? If the council really wanted this to be a fair review, a more select group of councillors who did not have a personal interest in the outcomes should have been handpicked. If this was not possible, and it was likely to be so, then this review should have been carried out independently.

3. Need: The Council has identified the Traveller Site need as:

Family A: Immediate 13 pitches rising to 23 pitches by 2026

Family B: Immediate 3 pitches rising to 7 pitches by 2026
The capability of accommodation for each of the 11 short listed sites is as follows:

- Land at Brickyard Lane Residential: 4 Pitches
- Former Allt-yr-yn Brickworks Residential: 12 Pitches
- Yard Adjacent to the A449 Transit: 7 Pitches
- Land to West of Llanmartin School: 7 Pitches
- Former Langstone Nursery Residential: 6 Pitches
- Land to South of Langstone Cottage: 12 Pitches
- Former Ringland Allotments Either: 9 Pitches
- Hartridge Farm Road Residential: 30+ Pitches
- Former Speedway Site Transit (?): 17 Pitches
- Former Chicken Processing Plant Residential: 8 Pitches
- Land at Celtic Way Transit: 14 Pitches

Of all the sites that were ‘carefully’ selected for residential use only one site has the capacity to house either of the two larger families with a further six sites the having the capacity to house the smallest family. If these sites were carefully selected how is it that from the outset the basic need, i.e. the site size, was not an initial, and most critical, criteria considered.

Further, if the travellers were properly consulted the Policy Review Group would have appreciated the travellers highest priority was that each family being kept together and on their own site and not a communal site as proposed. This further brings the process into question and supports the likelihood that the timescale used being inappropriate.

The Council has been aware of the need to identify traveller sites since 2007. It appears they have not taken the need seriously and have now displayed incompetence in their ‘final hour’ to attempt to now re-identify such sites within such an inappropriate time scale in what can only been seen as incompetence, non-transparencies, biasedness, and possible manipulation for personal advantage of some Councillors involved with the process.

The Full Council Meeting dated 4 June 2013: this meeting was farcical in that it did not discuss the attributes of the LDP but was based on the location of the Gypsy and Traveller Sites. There was an outward display of NIMTOism (Not In My Term of Office) and NIMBYism (Not In My Back Yard). This is supported by a circular within a ward from two Councillors who encouraged residents to write to support the LDP solely so as to prevent their ward from being reconsidered for a possible site and an email from a Councillor openly declaring that he voted for the LDP stating ‘difficult for me to vote against the LDP because of an implied threat that sites might be found in my ward’. Both documents can be evidenced.
a. The report states:

Following the end of the consultation period for the Deposit Plan, in June 2012, the Scrutiny Committee was informed that the new administration had asked for a re-examination of the locations for Gypsy and Traveller Sites to be included in the Local Development Plan. The referral was discussed at the meeting of the Scrutiny Committee for Community Planning and Development on 27 June 2012, at which the Committee agreed to accept the referral, and to appoint a Policy Review Group to undertake the research work over the summer and report back to the full Committee.

Terms were to re-examine the Gypsy and Traveller Sites yet the whole LDP was revised. This process is likely to be unacceptable within the regulations.

2. Methodology

a. The report states:

Analysis of this list against a clear list of criteria and using a scoring / weighting system, to establish an agreed shortlist of sites.

This was not the methodology used. In a letter dated 6 January to the Chief Executive he was asked:

'What policy was adopted to evaluate each of the 230ish sites? The Methodology Statement within the report states ‘Analysis of this list against a clear list of criteria and using a scoring /weighting system, to establish an agreed shortlist of sites’ and ‘Before the short-listing process took place, the Group held a number of meetings to discuss appropriate criteria for sifting sites, and agreeing the best methodology for undertaking this piece of work’. As no details of the ‘clear list of criteria’ and the ‘scoring / weighting system’ is contained within the report I would be obliged if you would forward me a copy of it.’

The Chief Executive’s response dated 28 February, 2013 was:

The criteria against which the sites were assessed can be viewed on the Council’s website on the Scrutiny pages. These pages include a hyperlink to spreadsheets on which all sites were assessed against the criteria, which are listed at the top of the table. I enclose a paper copy for your convenience. Sites are assessed using a traffic light system, with comments entered as necessary. This process was used as a sifting exercise to identify those sites which best meet the guidance criteria and general planning considerations to assist the Scrutiny review. As Officers will have discussed with you, there is no perfect site that meets every single criteria, and the purpose of the traffic light system was to flag up issues and highlight whether or not they are potentially insurmountable. Scrutiny Committee then considered this information to make an informed recommendation on which comprises were considered to be most palatable. As discussed in your meeting with the leader and Officers, there is no numerical scoring system to disclose because one was not used.

The intended methodology of scoring and weighting is a complex but accurate method of appraising sites (which was unlikely to be achieved in the timescale available) and is such that allow others to evaluate the results and compare all sites to assess fairness. Any discrepancies highlighted can be reassessed individually and any site can be re-evaluated. However, confirmed in the above response this method was not used. The actual method used, a traffic light system, is very much a simplistic method that is subject to being individually opinion based and is very difficult, if not impossible, to be evaluated by others. Thus such a method does not support transparency as claimed and, further, can lend itself to biasedness.

b. The report states:

Taking into account all the evidence presented during its initial meetings, the Group agreed the criteria to be used in the short-listing process. All the potential sites were mapped using the Council’s GIS data system, to determine their rankings against the criteria identified by the Group.

A ‘table top’ survey to determine site rankings against criteria is not an accurate assessment of sites.

c. The report states:
The criteria used were:

- Welsh Government Circular 30/2007: Planning for Gypsy and Traveller Caravan Sites
- Good Practice Guide in Designing Gypsy and Traveller Sites in Wales, July 2009

The site fails this criteria on many points:

The Hartridge Farm Road:

- The site seriously dominates the adjacent hamlet
- The size of the site flagrantly flouts the recommended size. Furthermore the intention is to place three sites within one site and make it a communal site which is contrary to the preferences of the travellers.
- The site is adjacent the RSPCA animal shelter and would create operational activities and two way nuisances.
- The site is directly adjacent a main railway line that intended noise retention fencing will have little effect. Such noise will be more intensive on caravans than housing especially at night. There is inconsistency here as previously sites have been rejected because of noise issues.
- The formation of hard surface bases will increase the out fall of rainwater into the existing reens thus increasing the likelihood and severity of the already known flooding to the nearby Ringland Circle homes.

The Former Allotment Site:

- Is not former but still remains an allotment and plots have not been allocated even though, it appears, there remains a waiting list for such plots.
- The site has a pylon on the site and has overhead power cables passing over.
- The site is directly adjacent the SDR and will be subject to noise and pollution. Again there is inconsistency here as previously sites have been rejected because of noise issues.
- The formation of hard surface will increase the out fall of water on to the adjacent SDR thus increasing the likelihood and severity of the already known flooding to that SDR.

If the Policy Review Group claim that they referred to the criteria mentioned above then they did not pay much attention to it.

d. The report states:

Site visits were then conducted on 16 and 20 August 2012 to look at the sites that appeared to best meet the criteria. The purpose of the site visits was to identify any potential problems not evident from the paper based shortlisting exercise, and also allow Councillors to see for themselves how accommodation could work in that setting. No site was entered without permission.

Two days to conduct site visits appears to indicate a ‘whistle stop tour’ and not a realistic assessment of site conditions. This timescale would be inappropriate to achieve the goal. Furthermore, two of the five Members of the Policy Review Group did not attend.

3. The Consultation Process

The Consultation Process was ineffective in that a very large number of residents were not aware of the Council’s proposals relating to the Gypsy and Traveller Sites. The Council knowing how emotive this issue was going to be should have notified each household by post.

a. The report states:
In all, the Group considered 237 sites during the short-listing process. In the first stage, all of these sites were assessed against the above criteria, and the Group were able to discount those sites that would be completely undeliverable according to the GIS data results. For each site ruled out, clear reasons were given for that site being discounted. This information was available on the Council website and had been available throughout the consultation period.

The ‘clear’ reasons are inconsistent throughout and the failure of the Group to establish a scoring/weighting system as claimed makes their ‘reasons’ impossible to evaluate.

b. The report states:
Following the initial public consultation and objections to the 5 gypsy and traveller sites originally identified in the deposit LDP, the new administration considered that this particular issue required further consideration. Therefore, the matter was referred to the Scrutiny Committee for Community Planning and Development.

There has been no confirmation, although previously requested, as to under what regulations would approve this review. It was initiated as a focussed change and the ‘promoted’ to a revised plan. It is questionable whether it is proper.

c. The report states:
The Council has a statutory duty to provide suitable sites to provide accommodation for gypsy and traveller families and there is a legal requirement to ensure that provision is made in the LDP for both temporary and permanent sites. The LDP dated April 2012 had already complied with that statutory duty.

In conclusion whilst I recognise the need for Gypsy and Traveller sites and fully support the City Council in their search for suitable portions of land this Scrutiny Report is inconsistent, biased, is incomplete in its assessments made and offers no analytical evidence of the preferences made for the selection of travellers sites as claimed. The Policy Review Group recommendations display a lack of understanding of the Travellers needs which was further reinforced by a member of the Policy Review Group during Full Council on 4th June 2013 displaying a serious lack of understanding of what constitutes a Travellers Site, as referred to in the minutes, thus casting further, serious, doubt on the integrity of the aforementioned report they produced. It is evident that this report fails at all levels to include any evidence to support its recommendations and is, therefore, seriously flawed.

B. Hartridge Farm Road

Size - The proposed size of the site is unimaginable and is far outside the Welsh Assembly Government’s Guidelines and Good Practice. The site is intended to have up to 43 pitches with each pitch having up to 3 to 4 caravans. This will make this site not just the biggest in Britain but the biggest in Europe. Such a development will not be in the interest of residents or travellers alike wherever that area is located and will not be in the interest of Newport itself. Further a site of this scale will not encourage the integration of travellers within the community but is likely to have the opposite effect. Therefore the proposal itself is inconceivable.

Layout - The proposed layout is contrary to the good faith of the Welsh Assembly Government’s Guidelines and Good Practice. To take a single large site and split it into three sites to house all three families flagrantly contravenes the guidelines and will dominate the immediate small community. It is also unfair to the travellers as they do not want communal sites as it will promote conflict within the families as well as likely to infringe the human rights of both the travellers and the immediate communities alike.

Location - This site is not suitable and other sites are more suitable. The location of the site is regarded by the Travellers themselves as unsuitable as they have justifiable concerns being too close to Llanwern High School with regard to conflict. Their preference is to be more remote. This has been refuted in the past by the Council who say they re-consulted the travellers on this point and the travellers then elected to occupy this site. It should be noted here that the question asked was did they prefer to occupy this site or be allocated small sites where individual families would be split, as traveller families main criteria is to stay together they elected this site. The question is unfair and biased and is seen as possible coercion by the Council to unfairly reinforce their recommendations. Further consideration should be given other sites such as the former speedway site, and similar, that have previously been nominated by both travellers and non-travellers alike, and to those sites identified in the existing Local Development Plan as being more favourable. The revised version of the plan does not give due consideration to the alternative sites available, nor does it provide sustainable reasons for rejecting those previously preferred.

In the revised draft plan, the Council have favoured sites to the east of Newport as the preferred locations. Travellers have expressed no such preference and are more concerned that selection should be based on the suitability of each individual site.
Current use - The Road Safety Centre is the focal point of contact for all road safety education, training and publicity service in Newport and surrounding area. To lose this facility would be a great loss to Newport as some courses in particular develop an understanding of behaviour and attitude and build confidence in the students (especially those of low attainment) themselves and many go on to a career in motor maintenance and the like from the experience and knowledge they have gained. Further, the Centre is within walking distance for the Llanwern High School pupils.

Access - This site has restricted access along a lane adjacent to two schools. The schools attract a tremendous amount of traffic at peak times while Hartridge Farm Road alongside the houses there are no footpaths, no street lighting and the road narrows to just 15 feet. The road leading up to the site is in poor condition and barely suits its current needs. This would need extensive and costly refurbishment. The Policy Review Group has already identified and recorded vehicle access issues for the triangular site but is now choosing to ignore it.

Llanwern High School - Because of parents' perception of traveller sites, rightly or wrongly, it would undermine the Council's strategy of improving education in the east of the city. (Prior to the building of the new High School parents were reluctant to send their children to the old Hartridge School, choosing St Julian's, Caerleon, Caldicot or Chepstow Schools instead). The remarkable transformation of the new building and the look, attitude and pride of the pupils has changed that. However, all the good work put into the new school could be undermined and the impressive new Llanwern High School could become a very expensive, underused, facility.

Ysgol Gymraeg Casnewydd - Again because of parents' perception of traveller sites, rightly or wrongly, parents are likely to reconsider their choice of school for their children. This would undermine further the already fragile financial position of the school thus deterring future needed investment.

Financial Matters -The Council's financial strategy will also be undermined because the proposed site is designated for building and the capital receipts used to offset the cost of the new Llanwern School and so reduce the Council's debt.

RSPCA Centre - For years the RSPCA Centre and the residents have co-existed amicably. The dogs are rarely noisy, unless they are disturbed. They would be constantly disturbed if there was a traveller site next door. This would result in stressed animals and residents, including the travellers themselves. RSPCA staff and volunteers daily exercise the dogs but say they could not risk walking their nervous, abandoned charges passed a traveller site.

Land Presentation - The topography of this site, as it stands, is not totally suitable for the proposed use. Again the Policy Review Group has already identified and recorded that the topography of the triangular site is unsuitable but is now choosing to ignore it.

Amenities - Access to local amenities is via an underpass to Ringland. This underpass has in the past been often locked due to safety and antisocial behaviour issues. Such issues are likely to be considerably exacerbated by the proposed development thus putting travellers and their families at risk. The Travellers themselves have also expressed concerns.

Flooding – The adjacent properties in Ringland Circle are susceptible to, and have previously been damaged by, flooding caused by the reen running alongside the properties. With the large amount of hard surfacing required for pitches the rate of run off of rainwater into tat same reen will aggravate both the likelihood and ferocity of further flooding.

Noise - As the site is adjacent the busy main railway line there will be noise problems that will be a particular issue for caravans. A noise attenuation fence is proposed here but due to the level of noise will be of little effect.

Potential danger caused by animals - It is well know that many traveller families may keep a stock of ponies and horses now or in the future. There are many well documented examples of these animals escaping their confines. An animal of this nature running out onto the Railway, SDR or found wandering through the adjacent Schools or neighbouring Ringland Estate or Llanwern Village will undoubtedly cause issues and even cost lives in the case of the Railway or SDR.

Aspect - The site will be highly visible from the busy mainline railway and would potentially create a poor image of Newport.

In conclusion this site is neither suitable for the provision of traveller sites nor is such a massive site, one of the biggest in Europe, in the interest of Newport. Further the integrity of the Policy Review Group's Report, recommendations and conclusions are questionable for the reasons given. Moreover, there are no sound reasons for removing the sites previously proposed.
Council guidelines - Part of the original 220 site survey quoted that this site was unsuitable due to there being “Pylons on site and unsuitable access”, this hasn’t changed and remains a major issue. This is one of the main reasons the travellers themselves do not want to occupy this site.

Health issues related to pylons - There are numerous well documented papers relating to the health consequences of living near to electricity pylons. A study of childhood cancers recorded between 1963 and 1995 in England and Wales revealed that there is an increase in risk of children contracting leukaemia of 69% if they live within 200m of a power line and 23% if they live within 600m of a power line.

Location - The Council have favoured sites to the east of Newport as the preferred location. Travellers have expressed no such preference as to the location and are more concerned as to establishing a selection on suitability not location.

Land presentation - This site is not on level ground. The site is on a gradient unsuitable for siting caravans.

Access - Access to this would be shared with the proposed 1100 houses of Gallagher development which would increase traffic many fold on what is effectively a country lane. The turning in and out of the site by vehicles would be problematic given the location of the land and the fact that the road turns directly off from the 50mph limit SDR.

The Council has previously identified this land in part for the provision of a roundabout which would then create an access to the proposed site directly off or close to that roundabout. Such a situation at other possible sites has been condemned by both the Police and Highway Authorities.

Existing use - The allotment site is still a Statutory Allotment site and is not surplus to the requirement of the residents.

Aspect - The site is highly visible from the A48 so would potentially create a very poor image of Newport as this is one of the major routes into the city. The site would afford no privacy for families living there.

Safety - The A48 is a very busy major route into Newport and has a 50mph speed limit and the regular movement of heavy goods vehicles. Caravans and trailers would severely worsen the road safety situation.

Environmental - Council guidelines dictate that when selecting sites priority should be given to Brown Field. This area is an undeveloped green field site which is outside current development boundaries and currently provides a green wedge

Amenities - Access to local amenities is via an underpass to Dawson Close in Ringland. This underpass has previously had to be locked on a regular basis due to safety and antisocial behaviour issues. Such issues are likely to be considerable exacerbated by the proposed development. The access to the underpass is also often affected by flooding during periods of heavy rain.

Flooding - The A48 is often affected by flooding due to run off of surface water from the site and this would be exacerbated by the proposed development. Pooling water on a main access route with a 50mph speed limit creates a considerable safety hazard.

Financial Implications - The development of adjacent land for housing by Gallagher Estates would be very unlikely to go ahead if a Gypsy and Traveller site were provided on this land. This would be a loss to the City of amongst other things the payment of the 106 agreement.

Privacy - Due to the closeness of the SDR and the openness of the site there would be privacy issues.
Noise - Due to the closeness of the SDR there would be a noise issue. The Council proposal is to erect a noise attenuation fence to the boundary which will also be close to the proposed pitches. The Communities and Local Government’s Planning Policy for Traveller Sites states ‘not enclosing a site with so much hard landscaping, high walls or fences that the impression may be given that the site and its occupants are deliberately isolated from the rest of the community’.

Potential danger caused by animals - It is well know that many traveller families keep a stock of ponies and horses. There are also many well documented examples of these animals escaping their confines. An animal of this nature running out onto the SDR or found wandering through the neighbouring Ringland Estate will undoubtedly cause issues and even cost lives in the case of the SDR.
In conclusion this site is unsuitable for the provision of a traveller site. Further the integrity of the Policy Review Group’s Report, recommendations and conclusions are questionable for the reasons given. Moreover, there are no sound, sustainable, reasons for removing the sites previously proposed.
### Newport City Council Local Development Plan

**Representation Details**

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With regards to the concerns raised in relation to the Hartridge Farm Road site, the Council offers the following comments:

It is acknowledged that the size of the Hartridge Farm Road site is larger than Welsh Government guidance suggests, however this will avoid the need to split any of the individual families, which is an important factor for the families themselves. The size is sufficient to accommodate all 3 families, which would meet Newport’s residential need for Gypsy/Traveller provision. The proposed layout would use screening to effectively create 3 independent sites within the curtilage of the whole site. The site would also be screened from the road and nearby residential properties.

The site is within the settlement boundary and considered to be a sustainable location. Remote locations outside of the settlement boundary have poorer access to amenities and place more of an emphasis on car travel, therefore deemed to be more unsustainable. Site design can ensure it is well screened from the nearby RSPCA Centre and Llanwern High School.

The Road Safety Centre at the site would need to be relocated. The Council will assist with the relocation as best it can. This would be the case for any proposed use of the site.

With regards to proximity to the Sewage Pumping Station, no concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

It is acknowledged that the Hartridge Farm Road site will require improvements to the access road including the provision of a length of pavement. This will be agreed as part of a planning application and is not considered insurmountable.

The site will be well screened and should not impact on Llanwern High School and Ysgol Gymraeg Casnewydd. Perception of Gypsy/Travellers at the Schools is something that the Council will need to address through interaction with the Head Teacher and Governors.

The Council is aware of the financial implications to its budget.

The draft indicative layout of this site shows that a significant buffer could be provided between the RSPCA Centre and the pitches.

Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development. Ground re-profiling works will be required at Hartridge Farm Road and the work will add to the development costs, but is not considered insurmountable.

It is agreed that the locking of the underpass is something that needs to be avoided in order to ensure access to local amenities. The site is also within a short walk from Newport Retail Park.

A noise assessment has been undertaken for Hartridge Farm Road. It is proposed that a 1.8m high noise attenuation fence is constructed adjacent to the RSPCA Centre, alongside the mainline railway and between the SDR and north-eastern part of the site.

The Council has a duty to provide accommodation for the gypsy/traveller population. We do not have a duty to provide land for horses. The site will be owned and managed by the Council and there is no intention to allow the occupants to keep horses on site.

There are no flood risk issues at Hartridge Farm Road providing a buffer is left at the southern edge of the site adjacent to the railway.

A noise attenuation fence will be constructed alongside the mainline railway and the area will be well screened.

The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.

With regards to the issues raised in relation to the Former Allotment site, the Council offers the following response:

No concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

The site is adjacent to the settlement boundary and considered to be a reasonably sustainable location. More remote locations that are further outside of the settlement boundary have poorer access.
Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development. The results of these surveys have confirmed that some ground re-profiling works will be required at the Former Ringland Allotments. This work will add to the development costs but is not considered to be insurmountable.

Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

There are no allotments on the site. Alternative allotment provision can be investigated if it is demonstrated there is insufficient allotment provision across Newport as a whole.

A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

Highway Safety - Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

The Council Strategy is a Brownfield led strategy and preference is given to sites which are previously developed. A number of greenfield sites are within the Plan as they are considered appropriate and well located for development. This is why this site is included.

It is agreed that the locking of the underpass is something that needs to be avoided in order to ensure access to local amenities.

Flood risk at this site is not considered to be a significant risk.

The Council is aware of the potential financial implications of going ahead with the site. Gallagher Estates have planning permission for their major development in close proximity to the site and although they have submitted representations of concern, they are currently continuing to submit information to enable them to discharge planning conditions and get on site and build.

A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

Potential danger caused by animals - The Council has a duty to provide accommodation for the Gypsy/Traveller population. We do not have a duty to provide land for horses. The site will be owned by the Council and there is no intention to allow the occupants to keep horses on site.

The Scrutiny Review was undertaken in a transparent and democratic manner with extensive public consultation and publicity. The allegations made regarding the five Councillors on the working group are unfounded. This is obvious from the fact that one of the the three proposed sites in located in Coedkernew.

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### Representation Details

**by:** (No grouping)

**Filtered to show:** (all of) Stage=L; Status=M

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**Document:** Revised LDP, p.75

**Policy:** H15.01  
**Map:** Proposals West: Proposals Plan - West

**Summary:** Delete Celtic Way Gypsy and Traveller transit site.

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C1, C2, C3, CE1

12/02/2014
I am writing on behalf of Silver Telecom Limited to object to the proposal for a transit camp to be sited at land on Celtic Way, Duffryn, Newport.

Your representation form outlines the tests of soundness which the revised plan must conform to. However, in my opinion, this proposal does not meet the following tests of soundness:

- C1 - it is a land use plan which has had regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.
- C2 - it has regard to national policy.
- C3 - it has regard to the Wales Spatial Plan.
- CE1 - the plan sets out a 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.

LAND AT CELTIC WAY

The land at Celtic Way forms part of a larger business park known as Imperial Park or Duffryn Business Park. This is the premier employment location within Newport and, indeed, one of the strongest business parks in South Wales in terms of critical mass of existing employers and generating enquiries from new, or relocating, businesses.

However, there remain vacant buildings and sites available for occupation and it is important that we retain the highest quality business environment in order that we may attract further high quality corporate investors.

POLICY OBJECTIONS

The proposal to allocate the land at Celtic Way for a gypsy and travellers transit camp is, in my opinion, not appropriate. This is due to the fact that there is a significant inconsistency with national and regional planning policy.

Planning Policy Wales (PPW) sets the context for planning in Wales under which Newport City Council is to prepare its Statutory Development Plan. PPW is the principal and authoritative source of national planning policy with the fifth edition issued in November 2012 incorporating amendments to strengthen chapter seven on Economic Development. This latest edition includes a requirement that Local Planning Authorities plan for the whole economy and develop a comprehensive understanding of local economies and wider regional economies. The revision, in November 2012, instructed Local Planning Authorities to ensure that economic benefits associated with development are understood and that there should be recognition that there will be occasions when the economic benefit will outweigh social and environment considerations (para 7.2.2).

Planning Policy Wales, Edition 5, also instructed that Development Plans should include “… policies relating to future development on existing employment sites to protect them from inappropriate development” and to use the evidence base to set out an economic vision for the specific area. Indeed, mixed use development is to be promoted only where appropriate.

The Newport LDP Revised Deposit Plan also highlights the key importance of economic growth and Objective 3 states that the Plan seeks to “… enable a diverse economy that meets the needs of the people of Newport and those of the wider South East Wales economic region”. In addition, Policy SP18 states that there are available employment sites in West Newport where substantial development has already taken place and the Plan identifies that there are business advantages in locating near to other similar uses.

Policy EM1, 6.6, identifies Duffryn as a large scale strategic development area well connected to the M4, containing some of the most prestigious employment developments within Newport. The policy notes that “… there are some areas of development still available on this prestigious site for B1 and B2 uses, however, the owner (Welsh Government) has designated the site for single large user projects of at least 10 ha at a time.”

I understand that this land is owned by Welsh Government. Can you please confirm whether or not you have their agreement to this change of use? I have also been informed by a professional planning consultant that you do not have the authority to compulsory purchase land owned by the Welsh Government, could you confirm this please.
SPECIFIC COMPANY OBJECTIONS

My company designs and supplies high tech electronic circuits which we export around the world. Our customers include many leading companies in the Far East, USA and Europe such as Samsung, Panasonic, Siemens, LG, Toshiba, Tyco etc. These companies visit Imperial Park for business meetings and we have to project the best possible image to win orders from them.

We operate in a very cost sensitive market selling against competitors from China, Korea, Taiwan and India. A local transit camp would necessitate significant extra security measures which would drive up costs and affect my competitiveness. This could ultimately affect any expansion plans I might have.

I am very concerned about the health and safety of my employees, many who start early in the morning or work into the evening.

Based on previous experience of camps in this area my female employees are terrified of what they might face.

My current lease runs out in approximately 11/2 year’s time. At this point I would seriously consider vacating Imperial Park.

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It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

The Land at Celtic Way is owned by Welsh Government, who have indeed objected to the provision of a transit site. An agreement between Welsh Government and Newport City Council is the preferred approach to obtaining this land and delivering this site. If this is not possible, a compulsory purchase is an option that the Council could consider.

As with any other significant development, the Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.
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Document: Revised LDP, p.75

Policy: H15

Map: Proposals West: Proposals Plan - West

Summary: Object to Celtic Way Gypsy and Traveller transit site.
I am writing on behalf of Abriox Limited to object to the proposal for a transit camp to be sited at land on Celtic Way, Duffryn, Newport.

Your representation form outlines the tests of soundness which the revised plan must conform to. However, in my opinion, this proposal does not meet the following tests of soundness:

- C1 - it is a land use plan which has had regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.
- C2 - it has regard to national policy.
- C3 - it has regard to the Wales Spatial Plan.
- CE1 - the plan sets out a 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.

LAND AT CELTIC WAY

The land at Celtic Way forms part of a larger business park known as Imperial Park or Duffryn Business Park. This is the premier employment location within Newport and, indeed, one of the strongest business parks in South Wales in terms of critical mass of existing employers and generating enquiries from new, or relocating, businesses.

However, there remain vacant buildings and sites available for occupation and it is important that we retain the highest quality business environment in order that we may attract further high quality corporate investors.

POLICY OBJECTIONS

The proposal to allocate the land at Celtic Way for a gypsy and travellers transit camp is, in my opinion, not appropriate. This is due to the fact that there is a significant inconsistency with national and regional planning policy.

Planning Policy Wales (PPW) sets the context for planning in Wales under which Newport City Council is to prepare its Statutory Development Plan. PPW is the principal and authoritative source of national planning policy with the fifth edition issued in November 2012 incorporating amendments to strengthen chapter seven on Economic Development. This latest edition includes a requirement that Local Planning Authorities plan for the whole economy and develop a comprehensive understanding of local economies and wider regional economies. The revision, in November 2012, instructed Local Planning Authorities to ensure that economic benefits associated with development are understood and that there should be recognition that there will be occasions when the economic benefit will outweigh social and environment considerations (para 7.2.2).

Planning Policy Wales, Edition 5, also instructed that Development Plans should include “… policies relating to future development on existing employment sites to protect them from inappropriate development” and to use the evidence base to set out an economic vision for the specific area. Indeed, mixed use development is to be promoted only where appropriate.

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Policy EM1, 6.6, identifies Duffryn as a large scale strategic development area well connected to the M4, containing some of the most prestigious employment developments within Newport. The policy notes that “…there are some areas of development still available on this prestigious site for B1 and B2 uses, however, the owner (Welsh Government) has designated the site for single large user projects of a least 10 ha at a time.”

I understand that this land is owned by Welsh Government. Can you please confirm whether or not you have their agreement to this change of use?
SPECIFIC COMPANY OBJECTIONS

Abriox is a high technology company who specialise in the development of pipeline monitoring systems. Our customers are National Grid, Wales & West Utilities, Northern Gas Networks, Scotia Gas Networks, BP, Esso, Shell and other major companies, including international companies. These companies visit Imperial Park for meetings and we strive to project a professional image.

We use expensive high tech equipment on our premises and a local transit camp would necessitate significant extra security measures which would drive up costs and affect our competitiveness.

I am also concerned about the health and safety of my employees, many of whom start early in the morning or work late into the evening and sometimes at weekends. This could adversely affect our ability to recruit new employees for what will be perceived as “at risk” premises.

If this proposal proceeds we would seriously consider vacating Imperial Park at the end of our lease.

Item Question  Council Responses
13       Council Response

Business – It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

As with any other significant development, the Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.

The Council does not currently have Welsh Government’s agreement as landowner. However, if necessary Compulsory Purchase Order powers could be utilised.
I am writing on behalf of Llanwern Golf Club’s Management Committee and Members to register our full support of the Ringland Action Groups’ campaign to stop this totally unsustainable development in this location.

Listed below are The Golf Clubs very relevant concerns regarding this issue.

Junior Section - We have a very successful Junior Section which has several young members who have represented Newport City, Gwent County and the Welsh international Squad. Llanwern Golf Club has a high profile within the Junior Golf Fraternity and has held such prestigious events including County and International Matches. Through golf these youngsters have learnt life skills including discipline, good manners, trust and integrity which consequently will provide Newport with good citizens of the future. We cannot allow these opportunities to be put into jeopardy by any outside interference.

Employment - We currently employ 20 staff and any downturn in business caused by the proximity and by the image that travellers have portrayed of themselves, will result in job losses.

Animals - As is well documented, Gypsy/Travellers have a propensity to keep horses, ponies and dogs and let them wander and graze and soil any area they choose to roam on. As our Golf Club has a public footpath running the full length of the course, any trespass and damage caused will have a catastrophic effect on our course which is kept in pristine condition with an annual spend in excess of over £220k. Any deterioration caused by such damage would result in loss of members which no golf club in this current climate can possibly afford.

Relationships - We at Llanwern Golf Club are currently building excellent working partnerships with Llanwern High School i.e. Golf Scholarships and access for pupils to use our facilities as part of their physical education development. We also have close relationships with Newport Gwent Dragons and Newport County AFC. Whose players and thousands of supporters will have an enhanced opportunity to play our course. If this development is situated next to our course the perceived problems rightly or wrongly will ruin these relationships.

Finance - Golf courses are very expensive to run and maintain and any fall in the valuation of our land will decrease our ability to finance any future development through the help of our banking system. The result will be a steep decline in the standard of our course and clubhouse facilities.

Social - Llanwern village residents regularly use our club for social events, weddings and family functions. With the proposed local large scale housing development we are endeavouring to make our clubhouse a pivotal meeting place for the residents of Llanwern village. Any downturn in our revenue caused by the close proximity of the travellers site will severely affect our ability to provide such facilities.

Whilst we realise that Newport Council have a duty to provide a site for Gypsy/Travellers, a site of this magnitude and in particular this location we believe will severly damage the reputation of Newport as a place to live, visit and invest in.

After the legacy of the highly successful Ryder Cup Event, Newport’s profile has risen considerably. Newport Council has worked exceptionally hard to raise the City’s profile within Wales and Great Britain - and thus we have successfully shaken off the title we used to be known as - "Newport the Steel Town" now only to be replaced if this proposal goes through to be known as "Newport the Town with the largest gypsy encampment in Europe!!!"

Not a good marketing tool to attract inward investment especially for our Town Centre.
### Council Response

The Council has a duty to identify the need within its area for gypsy and traveller sites, and then to take steps to address that need. It is acknowledged that the size of the Hartridge Farm Road site is larger than Welsh Government guidance suggests; however, this will avoid the need to split any of the individual families, which is an important factor for the families themselves. The site, which would contain fewer pitches than Shirenewton in Cardiff, would not be the largest in the United Kingdom, let alone Europe. The size is sufficient to accommodate all 3 families, which would meet Newport’s residential need for Gypsy/Traveller provision. The proposed layout would use screening to effectively create 3 independent sites within the curtilage of the whole site. The site would also be screened from the road and nearby residential properties. The site is within the settlement boundary and considered to be a sustainable location. Remote locations outside of the settlement boundary have poorer access to amenities and place more of an emphasis on car travel, therefore deemed to be more unsustainable.

The Council has a duty to provide accommodation for the gypsy/traveller population. We do not have a duty to provide land for horses. The site will be owned and managed by the Council and there is no intention to allow the occupants to keep horses on site.

### Representation

Rokus, Ms Martina

**Document:** Revised LDP, p.75

**Policy:** H15.01

**Summary:** Object to proposed site at Celtic Way.

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<th>Item</th>
<th>Question</th>
<th>Representation Text</th>
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| 11   |          | Please accept this email notification as a record of opposition to this proposal. I believe an alternative location should be identified for this traveller accommodation which is situated in a more remote area from residential estates. The reasoning behind this objection is experience from the traveller population that have frequented Tredegar House in recent years. When these individuals have pitched their homes in the area we have seen a significant increase in petty crime and anti social issues. I strongly believe that there are good and bad individuals within every community but feel my comments are based on the experience of myself and others within the vicinity of Celtic Way.

We have already seen a massive impact on house prices with approximately 10 homes being put up for sale in one area shortly after the proposed traveller site being announced.

### Council Response

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.
### Representation Details

**by:** (No grouping)  
**Filtered to show:** (all of) Stage=L; Status=M

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<td>Sutton, Mr Chris</td>
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Document: Revised LDP, p.75  
Policy: H15.01  
Summary: Objection to the proposed Celtic Way site

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**Item Question**  
**Representation Text**
I refer to your letter dated 13th June 2013 in which you outline the procedure and timetable for further representations to be made against the Revised Deposit Local Development Plan. I understand this consultation period runs for a minimum of six weeks and comments need to be made, in writing, no later than Friday 26th July 2013.

Therefore, I am writing on behalf of a number of businesses, based in the immediate vicinity of the above proposal. This list of concerned parties, who wish to object to the proposal for a transit camp to be sited on land at Celtic Way, Duffryn, Newport, is extensive and set out at the end of this letter.

Your representation form outlines the tests of soundness which the revised plan must conform to. However, in my professional opinion, this proposal does not meet the following tests of soundness:

~ C1 - it is a land use plan which has had regard to other relevant plans, policies and strategies relating to the area or to adjoining areas .
~ C2 - it has regard to national policy.
~ C3 - it has regard to the Wales Spatial Plan.
~ CE 1 - the plan sets out a 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.

LAND AT CELTIC WAY
The land at Celtic Way forms part of a larger business park known as Imperial Park or Duffryn Business Park. This is the premier employment location within Newport and, indeed, one of the strongest business parks in South Wales in terms of critical mass of existing employers and generating enquiries from new, or relocating, businesses.

The Park offers a large scale landscaped setting enjoying good communications and an existing cluster of high quality occupiers. These include a data centre, financial services call centre, major manufacturing units, distribution businesses and various office and administrative functions.

The Park is centred upon the former LG Electronics complex which saw the development of some 2.4 million sq ft (subsequently extended) of industrial and semi-conductor buildings in a landscaped business park setting. The majority of these buildings are now occupied by leading companies and employers including Next Generation Data, Quinn Radiators, ALUK and Smiths News.

To the north of Celtic Way and Imperial Park lies Celtic Springs Business Park with regionally important employers including EADS/Cassidian and The Home Office whilst to the east lies Cleppa Park, Lloyds TSB, Target, DAC Beachcroft and a range of occupiers within Imperial House and associated business park. However, there remain vacant buildings and sites available for occupation and it is important that we retain the highest quality business environment in order that we may attract further high quality corporate investors.

POLICY CONTEXT
Planning Policy Wales (PPW) sets the context for planning in Wales under which Newport City Council is to prepare its Statutory Development Plan. PPW is the principal and authoritative source of national planning policy with the fifth edition issued in November 2012 incorporating amendments to strengthen chapter seven on Economic Development. This latest edition includes a requirement that Local Planning Authorities plan for the whole economy and develop a comprehensive understanding of local economies and wider regional economies. The revision, in November 2012, instructed Local Planning Authorities to ensure that economic benefits associated with development are understood and that there should be recognition that there will be occasions when the economic benefit will outweigh social and environment considerations (para 7.2.2).

Planning Policy Wales, Edition 5, also instructed that Development Plans should include "… policies relating to future development on existing employment sites to protect them from inappropriate development" and to use the evidence base to set out an economic vision for the specific area. Indeed, mixed use development is to be promoted only where appropriate.

The Newport LDP Revised Deposit Plan also highlights the key importance of economic growth and Objective 3 states that the Plan seeks to "… enable a diverse economy that meets the needs of the people of Newport and those of the wider South East Wales economic region". In addition, Policy SPI8 states that there are available employment sites in West Newport where substantial development has already taken place and the Plan identifies that there are business advantages in locating near to other similar uses.
Policy EMI, 6.6, identifies Duffryn as a large scale strategic development area well connected to the M4, containing some of the most prestigious employment developments within Newport. The policy notes that "... there are some areas of development still available on this prestigious site for B1 and B2 uses, however, the owner (Welsh Government) has designated the site for single large user projects of at least 10 ha at a time."

CONCLUSIONS
The land identified at Celtic Way forms part of a larger employment location stretching from Celtic Springs Business Park to the north, Imperial Park and Quinn Radiators to the west and Duffryn Business Park/Cleppa Park to the east.

There remain significant land holdings within this business park setting available for development and the strong combination of accessibility, labour supply, critical mass of existing occupiers and Tier 2 grant location makes this a regionally significant employment site for South Wales.

The proposal to allocate the land at Celtic Way for a gypsy and travellers transit camp is, in our opinion, not appropriate. This is due to the fact that there is a significant inconsistency with national and regional planning policy. These policies have, indeed, been further strengthened through the release of PPW Edition 5.

In the community consultation presentation held on Tuesday 19th July 2013, you requested that proposals be made for where this transit camp could go if not at Celtic Way. This is a decision for the Local Council, this representation is to highlight the inappropriateness of the proposal in the context of the business park setting on Celtic Way.

The draft Local Development Plan states that this land is owned by Welsh Government. Can you please confirm whether or not you have their agreement to this change of use? Since 2008, you will be aware that the difficult economic climate has impacted upon the economy of South Wales with reduced take up and corporate contraction. However, in our view there is a sense of recovery and it is clear from research from CBI and others that corporate companies are relatively well funded and are now awaiting the right time to invest for future production and growth.

It is difficult for Wales to hasten the decision making process that will dictate future investment plans, however, it is vital that we protect our strongest employment sites and buildings in order that we may create the most attractive business environment for inward investors. If the subject proposal was confirmed, then there would be a significantly poorer business environment around Celtic Way, which would detract from the marketing of existing buildings and available sites for employment purposes. As a strategic site for South Wales, this would impact not only upon Newport but the wider Welsh economy.

I confirm that I would be prepared to speak at a Hearing Session of the Public Examination.

Please contact me however, if you have any queries regarding the above.

Chris Sutton
Lead Director - Cardiff

Cc:
MIX
Paper "0"
"~pons.bl.tLOUCGS
FSC- 020230
Mr Whitwell, Managing Director, Quinn Radiators Limited
Mr Griffith, Managing Director, Curzon Real Estate Limited
Mr Razey, CEO, Next Generation Data
Mr Greenway, Senior Commercial Consultant, Cassidian
Mr T Lohrenz, Group Property and Facilities Manager, Smiths News Group
Mr P Burke, Operations Director, ALUK (GB) Ltd
Ms C Shiel, Facilities Manager, Target Group Limited
Mr L Etheridge, Office Manager, Go-Compare.com
Dr J Davis, Newport Cardiac Centre
Mr T Parry, Finance Director, Patent Seekers Ltd
Representation Details

by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M

Rep'n/Para/Policy       Representor                                                                                     Agent       Accession No Date Lodged Late? Source Type Mode Status Status Modified
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Mr J Hanlon, Technical Director, Abriox Ltd
Mr H Nawaz-Khan, Chief Executive, Altrust Ltd
Mr P Drommett, Regional Manager, RPS
Ms M Atherton, PA to Directors, Acorn Group
Ms L Nolan, Fletcher Morgan
Mr D Morgan, Office Manager, DACBeachcroft Claims Ltd
Mr M Price, General Manager, Holiday Inn
Mrs S Edwards, Managing Director, Silvertel
Mrs Edwina Hart, MBE, CSU, AM, Minister for Economy, Science and Transport
-------------------------------------------------------------------------------------------------------------------------------------
12 12 Speaking at Public Examination                                                                                       Yes

Item Question       Council Responses
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2 2 Soundness of LDP                                                                                                           No

13 13 Council Response

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

The land at Celtic Way is currently owned by Welsh Government. Welsh Government have objected to the proposal to place a transit site at Celtic Park. The preferred approach to obtaining the land and delivering the site would be through agreement with the Welsh Government. If this is not possible, compulsory purchase could be considered.
We are writing to endorse the letter to you from Mr. Chris Sutton of Jones Lang LaSalle and additionally note our reasons for objecting to the proposal.

We re-sited our business from the Albany industrial Estate in Newport to Celtic Way, at the same time we collapsed our Cardiff, Bridgend and Carmarthen businesses into this site, creating a hub to serve South Wales. We were attracted to this site due to it being a singular business only environment. Presently we are now considering whether to increase business here further.

Our site operates on a 24/7 basis with both HGV and transit van movements throughout the day and night. This creates Health and Safety issues which we successfully manage but would be made more challenging should the transit camp be sited nearby.

We would also have concerns that we would require a higher level of security than in place at present, which would come at an additional cost.

Objection noted. It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

The site will be designed as a transit site and therefore only used by Gypsy/Travellers on a temporary basis as they pass through Newport. It is expected that the Gypsy/Travellers will use their vehicles to move around and there will be limited activity in terms of moving around the area on foot.
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<td>10</td>
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Policy H1 is objected to on the grounds that appropriate allocations should be made in order to maintain a range and choice of appropriate housing land opportunities in larger villages outside the urban area which have a range of services and can be regarded as sustainable settlements in their own right, including Marshfield.

See attached Submission Document and Sustainability Appraisal.

1.0 INTRODUCTION

1.1 This Submission document has been prepared to accompany the required representation forms by Asbri Planning Ltd on behalf of The Rooney Family Trust. We are promoting land at Blacktown, Marshfield as a housing land allocation and its reinstatement in the settlement boundary in the Local Development Plan.

1.2 The site is within the Green Belt designation as identified in the adopted Newport Unitary Development Plan, which is proposed to be retained in the Local Development Plan, subject to further land being included near the M4 Motorway. Our clients acknowledge that a review of the Green Belt boundaries to accommodate development will not form part of the Plan proposals.

1.3 Nevertheless the physical nature of the site, if developed, would not erode the remaining gap between Marshfield and the Cardiff boundary, and there will be a need to allow for sustainable growth at some point in the future. As such we wish to emphasise the potential of the site, particularly at a stage later in the plan period when the current urban capacity which exists to accommodate additional housing development will be limited as a result of the completion of proposed schemes. Such a trend is being experienced in several English authorities where a need has arisen to consider the relaxation of controls within Green Belt boundaries.

1.4 This Statement is structured as follows.
   • In Section Two, a description of the objection site is provided;
   • In Section Three we submit representations on the Spatial Strategy and Strategic Policies;
   • In Section Four we make representations on General Policies;
   • In Section Five we make representations on Housing Policies;
   • In Section Six we provide a Sustainability Appraisal;
   • Our Conclusions are recorded in Section Seven.

2.0 DESCRIPTION OF SITE AND ITS SURROUNDINGS

2.1 The submission site is located approximately 11 kilometres to the west of Newport City Centre, to the west of the village of Marshfield, approximately 2 kilometres to the south of the junction of Marshfield Road with the A48 at Castleton.

2.2 The irregular shaped site is 5.88 hectares in area. It comprises a level area of grazing land, broken up into field parcels which are bounded by hedgerows. It lies to the north and west of Post Gwynne Farm, to the east of which the site bounds frontage development at Cae Brandi/St Mellons Road.

2.3 To the north is a belt of undeveloped, mainly wooded, land in a separate ownership, beyond which is a housing development known as Mallards Reach, which was constructed in the early 1990’s. To the east the site is bounded by another recent development of mainly detached dwellings at Oakfields.

2.4 To the south, beyond St Mellons Road, is an area of playing fields, beyond which is a community hall and a residential area off Wellfield Road. There are several individual dwellings to the west of the playing fields, including St Alban’s Cottage, which bounds the submission site to the south-west.
3.1 The development of the site would be compatible with Policy SP1 – Sustainability in that it would make efficient use of land. There would be opportunities to create more of a focus for development in Marshfield. This could build on the presence of existing community and recreational facilities to the south and provide shops and other facilities which are currently absent.

3.2 The development would also allow for enhanced footpath and cycle routes to the main part of the village from the Mallards Reach development and build on the presence of the National Cycleway Route which runs along St Mellons Road.

3.3 The proposed inclusion of the site outside the proposed LDP settlement boundary for Marshfield and within an area of Countryside covered by Policy SP5 – Countryside, Policy SP6 – Green Belt and Policy SP 8 – Special Landscape Areas is objected to. There are consequent objections to all three policies. The reasons given are set out below.

3.4 The site is bounded by St Mellons Road and existing residential development on three sides and the site’s western boundary does not extend development beyond that which already exists. As such the inclusion of the site within the Green Belt is not appropriate given the site’s characteristics and its degree of containment.

3.5 Planning Policy Wales (PPW) – Edition 5, November 2012, advises that Green Belt boundaries should be chosen carefully using physical features and boundaries to include only that land which it is necessary to keep open in the longer term. At paragraph 4.8.8 PPW states that:

“Since Green Belts require long term protection, when considering Green Belt designation, local planning authorities will need to ensure that a sufficient range of development land is available which is suitably located in relation to the existing urban edge and the proposed Green Belt…”

3.6 Paragraph 2.24 of the Revised Deposit LDP, which refers to the necessity of retaining a gap between the 2 cities of Newport and Cardiff is accepted. However, there is no need to retain the gap which includes the submission site as development would not result in a narrowing of the open area and development would not extend further to the west than what already exists. On this basis Policy SP 6 is nevertheless objected to, as sufficient flexibility does not exist to address development needs at later stages of the plan period. Paragraph 4.8.7 in PPW advises that where a green belt affects more than one authority, collaboration between those authorities is required. It is noted in this context that in the emerging Cardiff LDP there are no proposals to replicate the green belt designation on the Cardiff side of the boundary.

3.7 The site is also included within a Special Landscape Area. Whilst Policy SP8 does not necessarily preclude development from taking place, subject to the design being of a high quality, the Policy is nevertheless objected to on the grounds that the contained nature of the site separates it from wider areas of open countryside to the west, where the SLA designation is more appropriate in being applied to the distinctive character of the Wentlooge Levels and land to the north which rises to the A48 and M4 corridors.

3.8 Policy SP10 – House Building Requirement, is objected to as the ‘brownfield’ led strategy in restricting appropriate levels of development in sustainable settlements such as Marshfield, does not provide for a sufficient range and choice of housing. This point is expanded upon in the objections to Policy H1.

4.0 GENERAL POLICIES

4.1 It is intended that the development of the site would be compatible with Policies, GP1 – General Development Principles – Climate Change; GP2 – General Development Principles – General Amenity; GP3 – General Development Principles – Service Infrastructure; GP4- General Development Principles – Highways and Accessibility; GP 5 - General Development Principles – Natural Environment; and GP6 – General Development Principles – Quality of Design.

4.2 In sustainability terms the site is close to facilities in the village, being within a 1 kilometre distance of shops in Marshfield and Castleton. Marshfield Junior and Infants School is some 600 metres to the north. Bus services operating from bus stops nearby include the 31A/31C service Newport-Castleton-Marshfield- St Brides, which has 4 forward journeys and 3 returns, Monday to Friday, and 3 forward, 2 reverse on Saturdays. Service 30, Newport to Cardiff, along the A48 operates on a 40 minute frequency Monday to Saturday. The long distance footpath/cycle route between Newport and Cardiff passes through Marshfield and the level nature of the area renders it ideal for cycling journeys.

4.3 With regard to Policy GP5, the site does not contain or lie adjacent to any statutory or non-statutory sites of nature conservation interest. The nearest Sites of Special Scientific Interest (SSSIs) on the Gwent Levels (Rumney and Peterstone SSSIs) lie further to the west and cover an expansive area.

4.6 Previous ecological surveys associated with planning proposals on the site have established that the habitats of the site are considered to be of Local value only for wildlife, and the proposed development of the site would not entail any significant loss of wildlife features and, therefore, the proposed development of the site would not be unduly constrained by biodiversity and nature
4.7 Policy CE1 also relates to development in the Green Belt and Green Wedges. This policy reflects national guidance and is not objected to as the main purpose of these representations is to question the extent of the Green Belt designation at this location.

5.0 HOUSING POLICIES

5.1 As stated in the Introduction, it is acknowledged that the Green Belt designation will preclude development until a future review is considered necessary. However, in future years appropriate forms of development will need to be accommodated in Newport which reflect the existing settlement pattern of the surrounding villages and where development can be accommodated on reasonable rounding off sites which would not further erode existing open gaps between settlements.

5.2 On the edge of the City and its 'satellite' settlements such as Marshfield, in order to maintain a range and choice of appropriate housing land opportunities, there will be a future need for releases such as the site in question, particularly when existing brownfield options are exhausted.

5.3 Whilst Marshfield is a village outside the main urban area of Newport, there is no specific reference in the Plan to the larger settlements outside the urban area which have a range of services and can be regarded as sustainable settlements in their own right.

5.4 In the above context, Marshfield, as part of the linked settlement with Castleton, merits such consideration. The Ward has a population of over 4,000, approximately 3,000 of which live in the two villages.

5.5 ‘Cluster’ settlements which combined have a sustainable range of facilities are regarded as ‘sustainable settlements’ in various Local Development Plans in Wales and provision for appropriate growth is made. For this reason Policy H1 is objected to on the grounds that specific provision, either by specific site allocations or by favouring amendments to the settlement boundaries for a sustainable mix of housing should be identified in Marshfield/Castleton.

6.0 SUSTAINABILITY APPRAISAL

6.1 A Self-Assessment of the Alternative Site has been undertaken and is included in Appendix 2. Whilst the site was not subject to an earlier candidate site submission, it is noted that the Newport Site Assessment Methodology led to the agglomeration of a number of candidate sites forming the 46 strategic sites. The site falls within the overall Marshfield West agglomeration.

6.2 The Assessment attached in Appendix 3 provides a Sustainability Appraisal of the proposed site, using the Local Planning Authority's criterion which has been applied for assessing the significance of effects as included in the Deposit LDP Sustainability Appraisal/Strategic Environmental Assessment Report. The Assessment Scale from the Report is reproduced below and the site assessed against this criteria.

In conformity with the criterion

Partially meets the criterion/possibly in conflict/some constraints identified

In conflict with the criterion

Not relevant to the criterion/neutral effects

6.3 The assessment undertaken compares the ‘Self-Assessment’ with the assessment of Marshfield West, carried out by Atkins on behalf of the Council. In assessing a wider area for development to the west of Marshfield the assessment identifies 19 areas where the development would be in conformity with the objectives (Green), and 9 which would be in conflict (Red).

6.4 By contrast, in assessing the submission site in isolation, only 4, red, negative factors are attributed (in relation to the green belt and green field nature of the site and distance from passenger rail
6.5 It is clear, therefore, that development of the site would meet a far larger proportion of the objectives in achieving greater sustainability, whilst there are only 4 negative factors likely to detract from these objectives. For the above reasons development of the site should be allowed for in a future Review of the Local Development Plan.

7.0 CONCLUSIONS

7.1 This statement is submitted as a response to the Newport Deposit Local Development Plan (LDP) on behalf of The Rooney Family Trust regarding land at Blacktown, St Mellons Road, Marshfield. The site is included within the Green Belt designation. Whilst we accept that the location of the site in the green belt is a major negative factor at present, there will nevertheless be a need to allow for sustainable growth at some point in the future and the development of the site would not result in a narrowing of the remaining gap between Marshfield (Newport) and St Mellons (Cardiff).

7.2 Objections are submitted to the following Plan Policies:
- Strategic Policies SP5 – Countryside, Policy SP6 – Green Belt and Policy SP 8 – Special Landscape Areas are objected to on the grounds that the site is identified outside the proposed settlement boundary for Marshfield within these designations;
- Policy SP10 – House Building Requirement, is objected to as the ‘brownfield’ led strategy restricts appropriate levels of development in sustainable settlements such as Marshfield;
- Following from the above, Policy H1 is objected to on the grounds that appropriate allocations should be made in order to maintain a range and choice of appropriate housing land opportunities in larger villages outside the urban area which have a range of services and can be regarded as sustainable settlements in their own right, including Marshfield.
- The Proposals Map, and corresponding Inset Plan 2, are also objected to on the above basis.

7.3 By not maximising opportunities for residential uses and allowing for flexibility which otherwise would be presented by the inclusion of the site within the settlement boundary, the Plan fails the Tests of Soundness. CE2, in not having considered relevant alternatives, and CE4 in not being reasonably flexible enough to deal with changing circumstances.

7.4 An Assessment has been prepared under the Council’s Sustainability Appraisal/Strategic Environmental Assessment objectives which show that in sustainability terms the development of the site would be acceptable. Indeed, development would aim to be compatible with general development policies in the Plan.

7.5 In light of the above, it is recommended that Newport City Council should consider the land shown edged red on the attached plan, as a future housing land allocation in the settlement boundary for Marshfield in future Focused Changes to the Plan.
Council Response

The Green Belt is set out to ensure that there is no coalition between Cardiff and Newport and as recognised within the representation this designation goes beyond a plan period. Therefore it is accepted that the Green Belt boundary is an accepted constraint. It is considered that the LDP provides a balanced housing supply, concentrating on the continued sustainable use of previously developed land. Therefore the need to encroach into the Green Belt is not considered necessary.

Over Reliance on Brownfield Sites
Planning Policy Wales sets out the overarching requirement for development to be placed on brownfield sites in preference to greenfield sites. The plan allocates 82% housing units on brownfield sites with the remaining 18% of units on greenfield sites (these calculations excludes the completions, windfall and small sites supply figures). The LDP is therefore compliant with Planning Policy Wales in terms that it has followed the search sequence criteria starting with the re-use of previously developed land and buildings within settlements which are located in areas accessible to jobs and services, where there is existing infrastructure and the scope to build sustainable communities.

Range and Choice
The supply of housing is considered to provide for a clear range and choice of housing which is a clear concern for many representors. The housing sites within the Plan are located across the City, with a clear focus on regeneration in the east as per the established strategy. The Plan provides a supply of affordable units for a mixture of needs as well as providing a mix of family homes and inner city living to cater for the broad housing market. The opportunity to provide homes in more rural locations has been investigated and there was no clear evidence to justify expansion to existing settlements. It is considered that the plan provides a more than adequate supply of housing, both market and affordable, which is both deliverable and viable.

The site at Blacktown is located adjacent the Marshfield Village Boundary, and is located in Green Belt, Countryside and Special Landscape Area designations. The site is also located in a Zone C1 flood risk area.

The plan seeks to promote the reuse of Brownfield sites in preference to extensive use of Greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities.

The forecast housing need has been assessed in the context of population and employment projections and current market realities. The Plan allocates more than sufficient land to meet this requirement. Additional housing allocations in a rural location cannot therefore be justified. Furthermore, the release of the representation site for housing would be contrary to the Council’s strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

It is recommended that this site is not included in the Local Development Plan for development.
### Representation Details

**Document:** Revised LDP, p.21  
**Policy:** SP05  
**Summary:** Objection to the countryside allocation to include Blacktown, Marshfield

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<tr>
<td>10</td>
<td>Soundness Test</td>
<td>No</td>
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<tr>
<td>11</td>
<td>Representation</td>
<td>The site is bounded by St Mellons Road and existing residential development on three sides and the site’s western boundary does not extend beyond that which already exists. As such the inclusion of the site within the Green Belt is not appropriate given the site’s characteristics and its degree of containment. See attached Submission Document and Sustainability Appraisal</td>
</tr>
<tr>
<td>12</td>
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**Item Question**  Council Responses

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<th>Question</th>
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**Accession No:** 01/08/2013  
**Date Lodged:** 01/08/2013  
**Late:** No  
**Source:** E  
**Type:** O  
**Mode:** I  
**Status:** M  
**Status Modified:** SA/SEA submitted
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<td>13</td>
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No change. The site is within a proposed Special Landscape Area, Green Belt, and Countryside allocation. The plan seeks to promote the reuse of brownfield sites in preference to extensive use of greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities. The forecast housing need has been assessed in the context of population and employment projections and current market realities. The plan allocates sufficient land to meet this requirement. Additional housing allocations in a rural location cannot therefore be justified. Furthermore, the release of the representation site for housing would be contrary to the Council’s strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8. A background paper ‘Delivery and Implementation’ has been produced to expand on the information supplied in Chapter 13 of the Deposit LDP. This sets out the proposed phasing, constraints and infrastructure requirements for each allocation. The Delivery of each site is considered here, setting out the justification for its continuation in the plan based on evidence from developers and landowners. Some of the large brownfield sites allocated within the previous Unitary Development Plan have started construction e.g. Glan Llyn with 4000 homes and employment uses on the site. The impact on development by the economic recession is to be considered and the plan takes a long term view across the entire plan period. The LDP sets out a strategy for growth which allocates an adequate supply of land for residential and employment uses. The supply of this land is not concentrated in one area but across the City. It is recognised that growth in the east is significant but the west has not been overlooked with large brownfield sites allocated at Novelis, former Whitehead Works and Monmouthshire Bank Sidings. The review of village boundaries has clearly considered the need for expansion in these areas and following their assessment boundaries have been tightened and allocations resisted due to the unsuitability of sites proposed in these unsustainable locations. Notwithstanding the representation submitted in support of this site, the Council maintains the position that the LDP is sound and relies on the evidence which supports it. In this respect, the Council does not support this site. The countryside allocation should therefore remain.
The Rooney Family Trust

Asbri Planning

SA/SEA submitted

Document: Revised LDP, p.21
Policy: SP06
Summary: Objection to green belt boundary

---

5  Add a new site  Yes
Blacktown, Marshfield

10 Soundness Test  No
CE2
CE4

11  Representation
Planning Policy Wales (PPW) – Edition 5, November 2012, advises that Green Belt boundaries should be chosen carefully using physical features and boundaries to include only that land which it is necessary to keep open in the longer term.

There is no need to retain the gap which includes the submission site as development would not result in a narrowing of the open area and development would not extend further to the west than what already exists. On this basis Policy SP 6 is objected to, as sufficient flexibility does not exist to address development needs at later stages of the plan period. Paragraph 4.8.7 in PPW advises that where a green belt affects more than one authority, collaboration between those authorities is required. It is noted in this context that in the emerging Cardiff LDP there are no proposals to replicate the green belt designation on the Cardiff side of the boundary.

See attached Submission document

12  Speaking at Public Examination  Yes
To discuss the representations and to respond to points directly raised by the Inspector

---

2  Soundness of LDP  No

---

13  Council Response
No change. Newport Unitary Development Plan 1996-2011: Inquiry Report – The Inspector stated that with the strong development pressures on the land between the two cities and the narrowness of the undeveloped gap between them there is a need to establish an area of Green Belt between Newport and Cardiff in order to keep this land permanently open. This approach is supported in PPW para 4.7.1.

In light of continued pressure to develop the area it is considered justified. Pressure includes internal pressure from within the authority and outside. The Cardiff City Council Preferred Strategy has indicated a strategic housing (500+) and a strategic employment site in the north east of the city near or adjacent the green belt, adding additional development pressure on the area. Piecemeal development of sites in the Green belt would serve to undermine the overall purpose of the allocation.
<table>
<thead>
<tr>
<th>Rep'n/Para/Policy</th>
<th>Representor</th>
<th>Agent</th>
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Newport City Council Local Development Plan

Represented by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M

12/02/2014 Page 1177 of 1581
## Representation Details

**Document:** Revised LDP, p.24  
**Policy:** SP10  
**Summary:** Objection to SP10 due to Brownfield Strategy being too restrictive

### Item Question | Representation Text
---|---
5 | Add a new site  
   Blacktown, Marshfield  
   Yes

10 | Soundness Test  
   CE2  
   CE4  
   No

11 | Representation  
   Policy SP10 – House Building Requirement, is objected to as the ‘brownfield’ led strategy in restricting appropriate levels of development in sustainable settlements such as Marshfield, does not provide for a sufficient range and choice of housing. This point is expanded upon in the objections to Policy H1.

   See attached Submission Document and Sustainability Appraisal

12 | Speaking at Public Examination  
   To discuss the representations and to respond to points directly raised by the Inspector  
   Yes

---

**Item Question** | **Tick-box reply**
---|---
2 | Soundness of LDP  
   No
The Green Belt is set out to ensure that there is no coalition between Cardiff and Newport and as recognised within the representation this designation goes beyond a plan period. Therefore it is accepted that the Green Belt boundary is an accepted constraint. It is considered that the LDP provides a balanced housing supply, concentrating on the continued sustainable use of previously developed land. Therefore the need to encroach into the Green Belt is not considered necessary.

Over Reliance on Brownfield Sites
Planning Policy Wales sets out the overarching requirement for development to be placed on brownfield sites in preference to greenfield sites. The plan allocates 82% housing units on brownfield sites with the remaining 18% of units on greenfield sites (these calculations excludes the completions, windfall and small sites supply figures). The LDP is therefore compliant with Planning Policy Wales in terms that it has followed the search sequence criteria starting with the re-use of previously developed land and buildings within settlements which are located in areas accessible to jobs and services, where there is existing infrastructure and the scope to build sustainable communities.

Range and Choice
The supply of housing is considered to provide for a clear range and choice of housing which is a clear concern for many representors. The housing sites within the Plan are located across the City, with a clear focus on regeneration in the east as per the established strategy. The Plan provides a supply of affordable units for a mixture of needs as well as providing a mix of family homes and inner city living to cater for the broad housing market. The opportunity to provide homes in more rural locations has been investigated and there was no clear evidence to justify expansion to existing settlements. Assessments of housing need take into account cross boundary issues. The Plan therefore has provided the opportunity for exception sites where such justification can be produced.

The plan provides a more than adequate supply of housing, both market and affordable, which is both deliverable and viable.

The proposed site is located adjacent the Marshfield Village Boundary, and is located in Green Belt, Countryside and Special Landscape Area designations.

The plan seeks to promote the reuse of Brownfield sites in preference to extensive use of Greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities.

The forecast housing need has been assessed in the context of population and employment projections and current market realities. The Plan allocates more than sufficient land to meet this requirement. Additional housing allocations in a rural location cannot therefore be justified. Furthermore, the release of the representation site for housing would be contrary to the Council’s strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

It is recommended that this site is not included in the Local Development Plan for development.
<table>
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<tr>
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<td>5</td>
<td>5</td>
<td>Add a new site Blacktown, Marshfield</td>
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<td>10</td>
<td>10</td>
<td>Soundness Test CE2 CE4</td>
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<tr>
<td>11</td>
<td>11</td>
<td>Representation</td>
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<td></td>
<td>The Policy is objected to on the grounds that the contained nature of the site separates it from wider areas of open countryside to the west, where the SLA designation is more appropriate in being applied to the distinctive character of the Wentlooge Levels and land to the north which rises to the A48 and M4 corridors. See additional information submitted with the representation.</td>
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<tr>
<td>12</td>
<td>12</td>
<td>Speaking at Public Examination</td>
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<td>To discuss the representations and to respond to points directly raised by the Inspector</td>
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<td>Soundness of LDP</td>
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<td>13</td>
<td>13</td>
<td>Council Response</td>
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<td></td>
<td>No change. The designation of Special Landscape Areas was assessed using the Landmap information system, as referenced in PPW, which is the data set used in the overall assessment undertaken using the Special Landscape Area Designation Criteria included within Natural Resources Wales' guidance. The Local Authority did refine the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. This work looked at the proposed SLAs identified by the assessment of the Landmap data and did not seek to amend this nationally consistent data set. The area Lane is allocated as part of the SLA3 Wentlooge Levels and this is based on the overall value of the landscape taking into account its qualities and features which have been deemed worthy of designation.</td>
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### Representation Details

**Document:** Revised LDP, p.75  
**Policy:** H15.01  
**Summary:** Objection to proposed site at Celtic Way

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<td>C1 and CE2</td>
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<td>11</td>
<td>Representation</td>
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<tr>
<td></td>
<td>Section H15 page 75</td>
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<tr>
<td></td>
<td>I consider the location of a transit site at Celtic Way is unsuitable for the following reasons:</td>
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<tr>
<td></td>
<td>1) The location of a transit camp at Celtic way will have a detrimental impact on the retention and continued development of new businesses on the adjoining sites, we have seen the deterioration of the town center and this would put the A48 businesses at risk.</td>
</tr>
<tr>
<td></td>
<td>2) The devastation left behind after previous encampments and the danger posed by horses being allowed to wander up and down the A48 and roam in residential gardens is a danger both to traffic and individuals, especially children out playing on the estates.</td>
</tr>
<tr>
<td></td>
<td>3) The bus service to Cardiff has been cut from going around the Duffryn estate and residents must now walk the lonely route along Pencarn Way and the A48, to wait for a bus that is not reliably on time. If the transit camp is located at Celtic Way the safety of people walking to work or waiting for a bus is put at an increased risk from transient individuals with little or no regard for the law.</td>
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<tr>
<td></td>
<td>4) Residents will have to live under greater risk of having garden furniture stolen and having property broken into. We have previously had a large garden table and chairs stolen on one occasion and a hose pipe reel on another. The transit camp will increase the number of passing families residing in the area and consequently increase the number of thefts. Are the numbers of police going to be increased accordingly?</td>
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<tr>
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<td>Speaking at Public Examination</td>
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<tr>
<td>2</td>
<td>Soundness of LDP</td>
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12/02/2014
Representation Details

Council Response

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

The proposal is for a transit site providing temporary short-term accommodation, rather than a permanent place to live. In this context, the adjacent land uses to the Celtic Way site are not considered to be hazardous, however it is agreed that they are not suitable places for children to play. The indicative layout of the transit site will include green areas for play and therefore children will have onsite facilities.

The site will be designed as a transit site and therefore only used by Gypsy/Travellers on a temporary basis as they pass through Newport. It is expected that the Gypsy/Travellers will use their vehicles to move around and there will be limited activity in terms of moving around the area on foot. Therefore the fact there is poor street lighting and a lack of pavement is not considered to be a significant concern. Increased street lighting could be provided if Members consider it to be essential.

As with any other significant development, the Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.
<table>
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<th>Accession No</th>
<th>Date Lodged</th>
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<td>25/07/2013</td>
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**Document:** Revised LDP, p.76

**Policy:** H16.01

**Map:** Proposals East: Proposals Plan - East

**Summary:** Delete Hartridge Farm Road Gypsy and Traveller site.
My starting point is that I am fully in favour of legal, properly run, Council Traveller sites. During my eight years on Newport City Council I consistently argued, with virtually no support, that legal sites were the only way of solving the problems of illegal ones. However, legal sites must be in the right location.

Residents in the Hartridge and Ringland areas have outlined a large number of reasons why the Hartridge Farm Road and Allotment sites are manifestly unsuitable. I will restrict myself to just five reasons why the Hartridge Farm Road site is flawed, rendering the Local Development Plan unsound.

1) That site has long been identified for housing in the Unitary Development Plan. Council committed itself to spending £29m on replacing Hartridge High School, largely by borrowing to be repaid by land sales. Relinquishing that site leaves a £6m gap in Council finances. More, in fact, as the smaller but more prestigious Pwll Pen site would be blighted by the proximity of a traveller site. Therefore, the proposal undermines the Council's financial strategy and renders the LDP unsound.

2) The proposal also undermines the Council’s educational strategy for the east of the city. For years school numbers have been unbalanced because of the reluctance of parents to send their children to Hartridge High School because it was out of date and dilapidated, affecting the morale of both pupils and staff. As a consequence Caerleon and St Julian’s High Schools have been seriously overcrowded, affecting the quality of what they can offer. If parents were told those schools were full some exercised their right to apply to Caldicot or even Chepstow while others opted for private schools. To rectify this situation the Council decide to invest £29m, largely borrowed, to build a new school and develop a new image in the form of Llanwern High School. The transformation is remarkable. A brand new state of the art school that pupils (and staff!) want to go to without all the disadvantages of the crumbling, spread out old buildings. Morale has soared with attendance, appearance, results, and, vitally, enrolment all on the up. This all will be imperilled by the proximity of a traveller site and the £29m new building could become a very expensive white elephant, while the damage pressure on Caerleon and St Julian’s High Schools will resume. There will be a similarly detrimental affect on Ysgol Gymraeg Casnewydd should a traveller site be just the width of a road away.

3) The RSPCA animal shelter could not continue its highly valued work with a traveller site next door. The shelters’ dogs and those of the travellers would set each other off and neither the animals, the residents nor the travellers would have any peace. Likewise, the RSPCA would not allow its staff and volunteer dog walkers to take nervous and damaged dogs past the travellers’ site. The shelter would have to move but there is no provision in the LDP for this. The same might be true if houses were built on the site, although current residents have no problem, but funding for resettlement could be allowed for by planning condition.

4) The same is true of the Road Safety Centre which does vital work with youngsters who could be a menace on the roads. Road Safety lessons are a vital part of the curriculum of difficult to educate pupils at the High School. They can walk to the Centre and bussing them elsewhere would put a continuing drain on scarce school resources. No provision for re-location is made in the LDP.

5) The policy of concentration of traveller families is flawed. Lumping three separate families of different traditions together would create a large concentration against WG guidelines and common sense. Travellers have talked about a “concentration camp” and a “ghetto”. A leading councillor who was involved in devising this policy spoke in Council of putting them all together for ease of control and preventing the pain spreading to other areas. I would suggest that smaller units spread across the community makes far more sense.

For these five reasons and many more put forward by others, such as transforming the lives of the immediately adjacent neighbours, traffic congestion, SDR and railway noise and danger, I maintain that the LDP is unsound. I would particularly stress the undermining of the Council’s own financial and educational strategies.

If objectors are expected to put forward alternative sites I would suggest returning to the carefully considered original sites which were recommended by both planners and councillors. There will be objections to all sites and none are perfect. However, difficulties such as flood plain considerations can be overcome. A site that wasn’t available when the original five were proposed was the former speedway site. That is probably the best option of all and has the important advantage that the travellers favour it. Despite what has been represented that is emphatically not the case with Hartridge Farm Road and the Allotments. Consultation with the travellers was seriously flawed.
The Council has a duty to identify the need within its area for gypsy and traveller sites, and to then take steps to address that need. The Council is aware of the financial implications to its budget in meeting this need.

The site will be well screened and should not impact on Llanwern High School or Ysgol Cymraeg Casnewydd. Perception of Gypsy/Travellers at the schools is something that the Council will need to address through interaction with the Head Teacher and Governors.

The draft indicative layout of this site shows that a significant buffer could be provided between the RSPCA Centre and the pitches.

The Road Safety Centre at the site would need to be relocated. The Council will assist with the relocation as best it can. This would be the case for any proposed use of the site.

It is acknowledged that the size of the Hartridge Farm Road site is larger than Welsh Government guidance suggests, however this will avoid the need to split any of the individual families, which is an important factor for the families themselves. The site, which would contain fewer pitches than Shirenewton in Cardiff, would not be the largest in the United Kingdom, let alone Europe. The size is sufficient to accommodate all 3 families, which would meet Newport’s residential need for Gypsy/Traveller provision. The proposed layout would use screening to effectively create 3 independent sites within the curtilage of the whole site. The site would also be screened from the road and nearby residential properties.

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
<table>
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Document: Revised LDP, p.75

Policy: H15.02

Map: Proposals East: Proposals Plan - East

Summary: Delete Gypsy and Traveller site at Ringland Allotments site.
My starting point is that I am fully in favour of legal, properly run, Council Traveller sites. During my eight years on Newport City Council I consistently argued, with virtually no support, that legal sites were the only way of solving the problems of illegal ones. However, legal sites must be in the right location.

Residents in the Hartridge and Ringland areas have outlined a large number of reasons why the Hartridge Farm Road and Allotment sites are manifestly unsuitable. I will restrict myself to just five reasons why the Hartridge Farm Road site is flawed, rendering the Local Development Plan unsound.

That site has long been identified for housing in the Unitary Development Plan. Council committed itself to spending £29m on replacing Hartridge High School, largely by borrowing to be repaid by land sales. Relinquishing that site leaves a £6m gap in Council finances. More, in fact, as the smaller but more prestigious Pwll Pen site would be blighted by the proximity of a traveller site. Therefore, the proposal undermines the Council's financial strategy and renders the LDP unsound.

The proposal also undermines the Council's educational strategy for the east of the city. For years school numbers have been unbalanced because of the reluctance of parents to send their children to Hartridge High School because it was out of date and dilapidated, affecting the morale of both pupils and staff. As a consequence Caerleon and St Julian's High Schools have been seriously overcrowded, affecting the quality of what they can offer. If parents were told those schools were full some exercised their right to apply to Caldicot or even Chepstow while others opted for private schools. To rectify this situation the Council decide to invest £29m, largely borrowed, to build a new school and develop a new image in the form of Llanwern High School. The transformation is remarkable. A brand new state of the art school that pupils (and staff!) want to go to without all the disadvantages of the crumbling, spread out old buildings. Morale has soared with attendance, appearance, results, and, vitally, enrolment all on the up. All this will be imperilled by the proximity of a traveller site and the £29m new building could become a very expensive white elephant, while the damaging pressure on Caerleon and St Julian's High Schools will resume. There will be a similarly detrimental affect on Ysgol Gymraeg Casnewydd should a traveller site be just the width of a road away.

The RSPCA animal shelter could not continue its highly valued work with a traveller site next door. The shelters' dogs and those of the travellers would set each other off and neither the animals, the residents nor the travellers would have any peace. Likewise, the RSPCA would not allow its staff and volunteer dog walkers to take nervous and damaged dogs past the travellers' site. The shelter would have to move but there is no provision in the LDP for this. The same might be true if houses were built on the site, although current residents have no problem, but funding for resettlement could be allowed for by planning condition.

The same is true of the Road Safety Centre which does vital work with youngsters who could be a menace on the roads. Road Safety lessons are a vital part of the curriculum of difficult to educate pupils at the High School. They can walk to the Centre and bussing them elsewhere would put a continuing drain on scarce school resources. No provision for re-location is made in the LDP.
sense. Travellers have talked about a “concentration camp” and a “ghetto”. A leading councillor who was involved in devising this policy spoke in Council of putting them all together for ease of control and preventing the pain spreading to other areas. I would suggest that smaller units spread across the community makes far more sense.

For these five reasons and many more put forward by others, such as transforming the lives of the immediately adjacent neighbours, traffic congestion, SDR and railway noise and danger, I maintain that the LDP is unsound. I would particularly stress the undermining of the Council’s own financial and educational strategies.

If objectors are expected to put forward alternative sites I would suggest returning to the carefully considered original sites which were recommended by both planners and councillors. There will be objections to all sites and none are perfect. However, difficulties such as flood plain considerations can be overcome. A site that wasn’t available when the original five were proposed was the former speedway site. That is probably the best option of all and has the important advantage that the travellers favour it. Despite what has been represented that is emphatically not the case with Hartridge Farm Road and the Allotments. Consultation with the travellers was seriously flawed.

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**Item Question**  
Council Responses

2 2 Soundness of LDP

Noted. The Council is aware of the potential financial implications of going ahead with the site. Gallagher Estates have planning permission for their major development in close proximity to the site and although they have submitted representations of concern, they are currently continuing to submit information to enable them to discharge planning conditions and get on site and build.

The site will be well screened and should not affect Ysgol Gymraeg Casnewydd or Llanwern High School. Perception of Gypsy/Travellers at the School is something that the Council will need to address through interaction with the Head Teacher and Governors.

The draft indicative layout of the Hartridge Farm Road site shows that a significant buffer could be provided between the RSPCA Centre and the pitches.

Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
11 11 Representation

I write to you as the owner of the retail quarter at Celtic Springs. Our tenants include, Greggs, Bacaro, MJ’s and Kumon.

All parties at Celtic Springs, Imperial Park and Cleppa Park have fought over a long period to maintain this business location as ‘something special’ where we have not compromised on quality and as such have attracted blue chip organisations and facilities to support this location. This has been maintained throughout the worst financial circumstances in Britain’s peace time. Newport County Councils proposal for a 20 acre travellers site will put that level of quality and its development prospects at risk. Even in these more enlightened times of racial equality and a better understanding on travellers needs and aspirations this proposal is simply not compatible.

I would object on the grounds of incompatibility of uses and protection of existing employment sites.

I am aware that a large company is considering Celtic Springs for a project of 250-300 jobs, highly paid jobs at that. It would enormously help our tenants if this project were to be realised. This company has had cause to ask about these proposals and indeed have now deferred their decision. This proposal is putting at risk projects of significance for Newport and it is incomprehensible that the Council would put forward proposals that are materially damaging the city’s prospects. Indeed I would anticipate the city lose employers from this location over time. Business locations are in fierce competition and must be seen to have all the right infrastructure and no drawbacks. This will provide decision makers, rightly or wrongly, a ready-made excuse to reject Newport.

This is the wrong location for this facility. The sooner Newport publicly rejects this proposal the better.

13 13 Council Response

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.
### Representation Details

**by:** (No grouping)

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**Document:** Revised LDP, p.20

**Policy:** SP04

**Summary:** Potential flood risk and adequacy of Lliswerry pumping station.

---

### Item Question  Representation Text

11 RE. Concrete being laid on flood plain potential flooding on Ringland Circle. Lliswerry pumping station not adequate.

Re the telephone conversation regarding Hartridge Farm development I would like to raise the objection to any building taking place on this land due to the increase risk of flooding on Ringland Circle because of the culverts that run in front of the houses. These fill up with fast flowing water in a short space of time when we have heavy or persistent rain, this is not just surface water but water that comes down off Christchurch picking up natural debris on the way that blocks the grills this is why we are on priority, when this grills are cleared the water goes out on to the flood plains at a force. If the water has no where to go there will be an increase of flooding

Linda Henry

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### Item Question  Council Responses

13 Council Response

As part of the Local Development Plan process a Strategic Level flood risk assessment was required. Newport has undertaken such a flood risk assessment and this includes the proposed Gypsy and Traveller site at Hartridge Farm Road. The assessment noted that land South of the site, adjacent to the railway line, is located in flood Zone 3 (a high risk area). However, there is plenty of space for development to be located outside of this flood risk area.

As part of the Scrutiny Committee review, site appraisals were undertaken for all 11 sites that were subject to public consultation. This included consultation with the Environment Agency (now called Natural Resources Wales) and Dwr Cymru Welsh Water, neither of whom objected to the proposal. If this site proposal goes ahead, these organisations would be consulted further once a detailed site layout is drawn up and a planning application is submitted.

The extent of the proposed development to accommodate 43 pitches would not require the whole of the site to be 'concreted over', and it is intended that significant green areas would remain.

This strategic assessment indicates that development would need to be located outside of the high risk flood zone. An application would also need to ensure that it did not increase flood risk to other areas. A flood consequence assessment may need to be undertaken at the planning application stage when full details of the site are known.

The Council is currently not aware of any issues with the Lliswerry pumping station. Any proposed development subject to a planning application would need to ensure it had adequate levels of sewerage and water infrastructure. This would need to be agreed in consultation with Welsh Water and may include the need to upgrade an existing facility.
Thank you for your reply re; gipsy site at Hartridge Farm. I feel that you have not given an adequate answer and that you have glossed over the facts. My question was why has Crindeau been taken off the list as a flood risk when Ringland Circle is also a flood risk, if the scrutiny team had looked into this they would have found that Ringland Circle is on priority for flooding every time we have prolonged or heavy rain and the levels and speed of the water is alarming. I have photographic evidence of this, so I think this should be taken into consideration or is it the fact that peoples objections, concerns and opinions are not going to be taken into consideration and that the council have already made up their mind that the site is to go ahead. As regard the pumping station it is not my place to investigate this the council should be asking this question as this could affect a larger area. I would also like a straight answer to the current work being done on the flood plains as it is council property and consultations would have been held by both companies and both sides are being evasive.

Re the telephone conversation regarding Hartridge Farm development I would like to raise the objection to any building taking place on this land due to the increase risk of flooding on Ringland Circle because of the culverts that run in front of the houses. These fill up with fast flowing water in a short space of time when we have heavy or persistent rain, this is not just surface water but water that comes down off Christchurch picking up natural debris on the way that blocks the grills this is why we are on priority when this grills are cleared the water goes out on to the flood plains at a force. If the water has no where to go there will be an increase of flooding.

Linda Henry
## Representation Details

**Document:** Revised LDP, p. 75  
**Policy:** H15.01  
**Summary:** Object to proposed site at Celtic Way.

### Item Question  | Representation Text
---|---
11  | Further to the letter submitted in co-operation with Quinn Radiators Limited via Jones Lang LeSalle, we wish to formally comment on the Revised Deposit Local Development Plan ("LDP") that is currently under consultation by Newport City Council.

As set out in the aforementioned letter, GoCompare has serious concerns regarding the likely affect that the proposed transit site to be located on Celtic Way will have on local businesses and the associated levels of employment. For the avoidance of doubt, GoCompare confirms that it endorses the arguments raised in the letter.

GoCompare request that Newport City Council reconsider the proposal and do not proceed with the allocation of the land as a transit site for travellers.

### Council Responses

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13  | It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.
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Document: Revised LDP, p. 75

Policy: General G&T

Summary: Support LDP with particular reference to location of proposed Gypsy and Traveller sites.

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**Representation**

Having been made aware of the revisions to the above plan and in particular reference to the location of the Gypsy and Traveller sites as set out in the plan, is acceptable, and I accept and approve the Revised Deposit Local Development Plan.

---

**Council Response**

Support noted.
Representation Details

Lockyer, Mr D A

Document: Revised LDP, p.22
Policy: SP08
Summary: Propose amendment to SLA at Langstone.

Representation

However, further improvement could be made to the Plan in protecting Langstone Village from further major development by adding the Countryside north of the A48 that is outside of the boundary settlement, up to and including Old Roman Road, and designate it as a 'Special Landscaped Area'.

Council Response

The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales’ guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.
As Councillor for Marshfield I must represent the residents of my ward, because of the many emails and phone calls against the site, so therefore I support the opinions of my electors.

Therefore I must reject the site at Celtic Way for the following reasons:

1. The loss of business opportunities and to bring jobs and wealth into the Newport area.
2. The loss of value to residents properties.

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.
Document: Revised LDP, p. 75
Policy: General G&T
Summary: Support for Gypsy and Traveller sites allocated on the LDP.

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Document: p.75

Policy: General G&T

Summary: Support for Gypsy and Traveller sites allocated in the LDP.

#### Item Question

**Representation Text**

Having been made aware of the revisions to the above plan and in particular reference to the location of the Gypsy and Traveller sites as set out in the plan, is acceptable, and I accept and the approve the Revised Deposit Local Development Plan.

#### Item Question  Council Responses

Support noted.
### Representation Details

**Rep'n/Para/Policy**: 3851.L2//SP08  
**Representor**: Williams, Mrs Beverley  
**Document**: Revised LDP, p.22  
**Policy**: SP08  
**Map**: Proposals East: Proposals Plan - East

**Summary**: Extend Special Landscape Area to the north of Langstone.

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**Accession No**: 25/07/2013  
**Date Lodged**: 25/07/2013  
**Late?**: P  
**Source**: C  
**Type**: M  
**Status**: M  
**Status Modified**: M
Ysgol Gymraeg Casnewydd

Document: Revised LDP, p.113, para.9.52 - 9.54
Policy: CF13

Summary: Amend wording of Policy CF13.

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The plan makes no mention of the need for additional Welsh medium secondary school provision during the Plan period, despite the fact that the current provision (at Ysgol Gyfun Gw Wynllyw in Pontypool) will be full by September 2016. This is a very surprising omission given the Council's statutory obligation to provide Welsh medium secondary education and national policies in that regard.

The Council should add a new paragraph after paragraph 9.56, as follows:

"9.57 Additional Welsh medium secondary school provision is going to be needed within the plan period. The council plan to locate this additional provision at…(Newport City Council to complete the paragraph)."

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<td>Soundness of LDP</td>
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Council Response
At the time, there were no plans to host a WM2 school in Newport to support increasing demand. Since that time, a partnership arrangement has been set up between Welsh Government, Newport City Council and Monmouthshire CBC to host a south Gwent WM2 within Newport. This is in the early stages of planning, and no locations have been identified at the moment.
### Representation Details

**Document:** Revised LDP, p.76, para.5.33  
**Policy:** H16  
**Summary:** Object to allocation of Gypsy and Traveller site in at Hartridge Farm Road on traffic grounds.

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There have been long standing concerns about traffic and road safety issues regarding Hartridge Farm Road and its junctions with the access roads to Ysgol Gymraeg Casnewydd and Llanwern High School. These have never been satisfactorily resolved. The establishment of permanent residential pitches at Hartridge Farm Road will only exacerbate these problems.

The Council should amend the third sentence in paragraph 5.33 to read as follows (revised wording shown in italics):

"Subject to the thorough examination and proper resolution of the traffic and road safety issues involved (including full consultation with adjoining landowners and residents), the immediate need will be..."

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### Council Responses

- It is acknowledged that the Hartridge Farm Road site will require improvements to the access road including the provision of a length of pavement. This will be agreed as part of a planning application and is not considered insurmountable. Further consultation with adjoining occupiers will take place at the planning application stage.
### Representation Details

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**Document:** Revised LDP, p.75  
**Policy:** H15.01  
**Summary:** Object to proposed site at Celtic Way.

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**Item Question**  
**Representation Text**

11  
**Representation**

The full consultation comments are available to view against representation reference 3820.L1

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**Item Question**  
**Council Responses**

12  
**Speaking at Public Examination**  
**Yes**

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13  
**Council Response**

Please see response to 3820.L1
Document: Revised LDP, p.76
Policy: H16.02

Summary: Support use of former Ringland Allotments as an alternative to proposed site at Celtic Way.

**Item Question** | **Representation Text**
--- | ---
11 | Representation

The full consultation comments are available to view against representation reference 3820.L2

12 | Speaking at Public Examination

| Council Response |
---
13 | Former Ringland allotments, taken together, have been identified as a contingency site for transit accommodation.

The following points address concerns regarding the proposed transit site at Celtic Way:

Location and Design – The proposal is for a transit site providing temporary short-term accommodation, rather than a permanent place to live. In this context, the adjacent land uses to the Celtic Way site are not considered to be hazardous, however it is agreed that they are not suitable places for children to play. The indicative layout of the transit site will include green areas for play and therefore children will have onsite facilities.

24/7 access of HGV/movement of employees – The site will be designed as a transit site and therefore only used by Gypsy/Travellers on a temporary basis as they pass through Newport. It is expected that the Gypsy/Travellers will use their vehicles to move around and there will be limited activity in terms of moving around the area on foot. Therefore the fact there is poor street lighting and a lack of pavement is not considered to be a significant concern. Increased street lighting could be provided if Members consider it to be essential.

Cardiff to Newport dual carriageway is within 0.5 miles – The fact a main transport route is in close proximity to the site is considered more of an asset than a safety risk. There are numerous homes within Newport which are within 0.5 miles of a dual carriageway or motorway.

Crime/Perception of Crime – As with any other significant development, the Council has liaised with the police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the police if any incidents of crime that relate to the site are reported.

Alternative Sites – Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
### 3853.L3//General

**Document:** Revised LDP, p.75  
**Policy:** General G&T  
**Summary:** Propose two new sites A449 and Tredegar House Caravan Park instead of site proposed at Celtic Way.

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**Item Question Council Responses**

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### 3854.L1//H15.01

**Document:** Revised LDP, p.75  
**Policy:** H15.01  
**Summary:** Object to proposed site at Celtic Way.

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<td>Summary: Proposed two new sites A449 and Tredegar House Caravan Park instead of site proposed at Celtic Way.</td>
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<td>Council Response</td>
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</tbody>
</table>
### 3855.L1/H15.01

**Owen, Mr Alun Clive**

**Summary:** Object to site proposed at Celtic Way.

**Representation**

The full consultation comments are available to view against representation reference 3820.L1

**Speaking at Public Examination:** Yes

**Council Response**

Please see response to 3820.L1

### 3855.L2/H15.02

**Owen, Mr Alun Clive**

**Summary:** Support use of Former Ringland Allotments instead of Celtic Way site.

**Representation**

The full consultation comments are available to view against representation reference 3820.L2.

**Speaking at Public Examination:** Yes

**Council Response**

The Council response to this representation can be found against representation 3820.L2
### Representation Details

**Filtered to show:** (all of) Stage=L; Status=M

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**Document:** Revised LDP, p.75  
**Policy:** General G&T  
**Summary:** Propose two new sites A449 and Tredegar House Caravan Park as alternative site to Celtic Way.

---

**Item Question**  
**Representation Text**

11 11  
Representative

The full consultation comments are available to view against representation reference 3820.L3.

---

**Item Question**  
**Council Responses**

12 12  
Speaking at Public Examination  
Yes

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**Item Question**  
**Council Responses**

13 13  
Council Response

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

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### Representation Details

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**Document:** Revised LDP, p.75  
**Policy:** H15.01  
**Summary:** Object to site proposed at Celtic Way.

---

**Item Question**  
**Representation Text**

11 11  
Representative

The full consultation comments are available to view against representation reference 3820.L1

I very much support the objections which have been drawn up to reflect local views including my own.

---

**Item Question**  
**Council Responses**

12 12  
Speaking at Public Examination  
Yes

---

**Item Question**  
**Council Responses**

13 13  
Council Response

Please see response to 3820.L1
The full consultation comments are available to view against representation reference 3820.L2.

Yes

Former Ringland allotments, taken together, have been identified as a contingency site for transit accommodation.

Location and Design – The proposal is for a transit site providing temporary short-term accommodation, rather than a permanent place to live. In this context, the adjacent land uses to the Celtic Way site are not considered to be hazardous, however it is agreed that they are not suitable places for children to play. The indicative layout of the transit site will include green areas for play and therefore children will have onsite facilities.

24/7 access of HGV/movement of employees – The site will be designed as a transit site and therefore only used by Gypsy/Travellers on a temporary basis as they pass through Newport. It is expected that the Gypsy/Travellers will use their vehicles to move around and there will be limited activity in terms of moving around the area on foot. Therefore the fact there is poor street lighting and a lack of pavement is not considered to be a significant concern. Increased street lighting could be provided if Members consider it to be essential.

Cardiff to Newport dual carriageway is within 0.5 miles – The fact a main transport route is in close proximity to the site is considered more of an asset than a safety risk. There are numerous homes within Newport which are within 0.5 miles of a dual carriageway or motorway.

Crime/Perception of Crime – As with any other significant development, the Council has liaised with the police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the police if any incidents of crime that relate to the site are reported.

Alternative Sites – Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
Representation Details

Newport City Council Local Development Plan

Filtered to show: (all of) Stage=L; Status=M
by: (No grouping)

Rep'n/Para/Policy Representer Agent Accession No Date Lodged Late? Source Type Mode Status Status Modified

3856.L3//General Roberts, Mr Dennis 25/07/2013 P O I M

Document: Revised LDP, p.75
Policy: General G&T
Summary: Propose two alternative sites at A449 and Tredegar House Caravan Park instead of site at Celtic Way.

Item Question Representation Text

11 Representation
The full consultation comments are available to view against representation reference 3820.L3.

12 Speaking at Public Examination

Item Question Council Responses

13 Council Response
Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

3857.L1//H15.01 Hughes, J R 25/07/2013 P O I M

Document: Revised LDP, p.75
Policy: H15.01
Summary: Object to proposed Gypsy site at Celtic Way.

Item Question Representation Text

11 Representation
The full consultation comments are available to view against representation reference 3820.L1.

12 Speaking at Public Examination

Item Question Council Responses

13 Council Response
Please see response to 3820.L1
Document: Revised LDP, p. 76
Policy: H16.02
Summary: Support use of Former Ringland Allotments instead of site proposed at Celtic Way.

11  Representation
The full consultation comments are available to view against representation reference 3820.L1

12  Speaking at Public Examination
Yes

13  Council Response
Former Ringland allotments, taken together, have been identified as a contingency site for transit accommodation.

The following points address concerns regarding the proposed transit site at Celtic Way:

Location and Design – The proposal is for a transit site providing temporary short-term accommodation, rather than a permanent place to live. In this context, the adjacent land uses to the Celtic Way site are not considered to be hazardous, however it is agreed that they are not suitable places for children to play. The indicative layout of the transit site will include green areas for play and therefore children will have onsite facilities.

24/7 access of HGV/movement of employees – The site will be designed as a transit site and therefore only used by Gypsy/Travellers on a temporary basis as they pass through Newport. It is expected that the Gypsy/Travellers will use their vehicles to move around and there will be limited activity in terms of moving around the area on foot. Therefore the fact there is poor street lighting and a lack of pavement is not considered to be a significant concern. Increased street lighting could be provided if Members consider it to be essential.

Cardiff to Newport dual carriageway is within 0.5 miles – The fact a main transport route is in close proximity to the site is considered more of an asset than a safety risk. There are numerous homes within Newport which are within 0.5 miles of a dual carriageway or motorway.

Crime/Perception of Crime – As with any other significant development, the Council has liaised with the police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the police if any incidents of crime that relate to the site are reported.

Alternative Sites – Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
### Representation Details

**by:** (No grouping)  
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**Document:** Revised LDP, p.75  
**Policy:** General G&T  
**Summary:** Propose two new sites at A449 and Tredegar House Caravan Park instead of the proposed site at Celtic Way.

**Item Question**  
**Representation Text**

11  11 Representation  
The full consultation comments are available to view against representation reference 3820.L3.

12  12 Speaking at Public Examination  
Yes

**Item Question**  
**Council Responses**

13  13 Council Response  
Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

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### Representation Details

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**Document:** Revised LDP, p.75  
**Policy:** General G&T  
**Summary:** Propose use of existing site in Peterstone/Wentlooge area.

**Item Question**  
**Representation Text**

11  11 Representation  
There is an existing site in the Peterstone/Wentlooge area. Could this area be extended as if it has been deemed suitable and fit for purpose it would save money and time trying to decide where else to place the travellers.

12  12 Speaking at Public Examination  
Yes

**Item Question**  
**Council Responses**

13  13 Council Response  
Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
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Document: Revised LDP, p.75
Policy: General G&T
Summary: Propose two new alternative sites at A449 and Tredegar House Caravan Park instead of site at Celtic Way.

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11  Representation
The full consultation comments are available to view against representation reference 3820.L3.

12  Speaking at Public Examination
Yes

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13  Council Response
Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
Document: Revised LDP, p.75, para.5.30
Policy: H15
Summary: Objection to Gypsy and Traveller Transit Accommodation at Celtic Way.

Item Question | Representation Text
---|---
10 | Soundness Test
C1

Representation

I object to the proposed Gypsy and Traveller Transit Accommodation proposed for Celtic Way Coedkernew. The area simply isn't suitable for several reasons. Local businesses have already made it clear the transit site would make them less likely to expand their operation in this area and there is already evidence of companies discounting this area for new premises due to the proposal (evidence from Nolan Business Associates). The area isn't safe for residential use due to the number of HGV's on the road, lack of pavements and the open water all around the area which would be particularly dangerous for travellers not familiar with the area. The site would be difficult to contain due to the adjacent "wasteland", making it likely to expand into the SSSI. I would like the plan changed to include the transit site with the residential site, the economies of scale which could be achieved by doing this would make it much more cost effective.

Council Response

Business – It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable.

Police/Crime/Perception of Crime – The Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.

Alternative Sites – Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
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<td>Having been made aware of the revisions to the above plan and in particular reference to the location of the Gypsy and Traveller sites as set out in the plan, is acceptable, and I accept and the approve the Revised Deposit Local Development Plan.</td>
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**Council Responses**

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### Representation Details

**Document:** Revised LDP, p.22  
**Policy:** SP08  
**Summary:** Want Special Landscape Area to the north of Langstone extended.

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<td>11 Representation</td>
<td>However, further improvements could be made to the Plan in protecting Langstone Village from further major development by adding the Countryside north of the A48 that is outside of the boundary settlement, up to and including Old Roman Road, and designate it as a 'Special Landscaped Area'.</td>
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<th>Item Question</th>
<th>Council Responses</th>
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<td>13 Council Response</td>
<td>The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales' guidance. Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.</td>
</tr>
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</table>
Cassidian Limited objects to the proposed location of the Gypsy and Traveller Transit Accommodation Site ("Site") at Celtic Way, Coedkernew for the following reasons:

1. This would be sacrificing valuable space in what has been set out as a "Key Employment Area" on the Key Diagram of the Local Development Plan. The area undoubtedly is "prestigious land which has good access to transport links". Celtic Way and its immediate surroundings are used almost exclusively for commercial and industrial purposes, proving the area to be one of the most compelling parts of Newport for companies to establish businesses.

2. In light of Newport's current unemployment situation (especially taking into account the high rate of unemployment in the area's 18-24 age group), the protection of the City's potentially high employment areas, is undoubtedly at the top of the Council's agenda. Accordingly, Cassidian objects to any decision the Council takes to change land use in an already proven industrial development area for what is, in essence, a residential proposal, outside a defined settlement boundary.

3. The Site, if located at Coedkernew, would also restrict expansion opportunities for existing local businesses and those located further afield. When Cassidian moved to its premises at Coedkernew, it was on the assumption that it would become part of a 'bigger business' community and 'mixed use' detracts from the further development of a business heartland.

4. Many businesses relocated to the area with the benefit of grants, which were provided as part of a business strategy to re-energise the area for businesses. The proposed Site (as would any settlement) detracts from this.

5. It is Cassidian's view that it would be in the best interests of those residents of Newport seeking employment, if the Council was to explore alternative locations for the proposed Site. The contingency site at the former Ringland Allotments, as set out in the Local Development Plan, has the advantage over Celtic Way. It complies with the Council's policies regarding social inclusion and the availability of community facilities for new development (as set out in the Local Development Plan's vision for a "Fairer City"). Celtic Way's industrial nature means that it will not provide any sort of community facility that is not purely based on the professional function of the location. It is not agreed that the Site is 'well related to suitable facilities and services for a settlement'.

Accordingly, we urge the Council to reconsider the Gypsy and Traveller Transit Site's location to a more suitable alternative site, owing both to the nature of the Celtic Way area and the proposed use.
Council Response

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

The proposal is for a transit site providing temporary short-term accommodation, rather than a permanent place to live. In this context, the adjacent land uses to the Celtic Way site are not considered to be hazardous, however it is agreed that they are not suitable places for children to play. The indicative layout of the transit site will include green areas for play and therefore children will have onsite facilities. The proposed site is located within the urban boundary of Newport.

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
Representation Details

by: (No grouping)

Filtered to show: (all of) Stage=L; Status=M

Rep'n/Para/Policy

Representer

Agent

Accession No

Date Lodged

Late?

Source

Type

Mode

Status

Status Modified

3862.L1/H15.01

Lambert Smith Hampton

25/07/2013 E O M

Document: Revised LDP, p.75

Policy: H15.01

Summary: Objection to Celtic Way Transit Site

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**Item Question**  | **Representation Text**
---|---

7  | Delete an existing site

Celtic Way Transit Site

Yes

11  | Representation

Objection to Policy H15: Proposed Allocation of Land at Celtic Way, Marshfield

We write on behalf of our clients South Wales Land Developments Ltd and Ruperra Properties, which have interests at Imperial House and Courtyard and Q1 and Q2, Imperial Park respectively. We write to object to Policy H15 and the proposed allocation of land at Celtic Way, Marshfield (also referred to as Coedkernew) as a transit gypsy and traveller site. Whilst it is evident that there has been a multi-stage review and consultation process on the matter which has included Scrutiny Committee review, public consultation, Sustainability Appraisal and endorsement by Cabinet, this Revised Deposit Plan represents a shift from the Celtic Way site being a contingency, alternative to a favoured site located on the A449. It is understood that the A449 site has been dismissed on highway access grounds, so by default, Celtic Way is now the favoured site, despite references in the May 2013 report to Cabinet indicating that Welsh Government has advised the Council that it has investor interest in the site and that it forms part of proposed employment allocation EM(1)i. The supporting narrative to that policy identifies that the locality is a large scale strategic development area containing some of the most prestigious employment developments within Newport. There is an obvious contradiction in the Deposit Plan which seeks to allocate land at Celtic Way for continued prestige employment investment whilst at the same time taking part for a transit gypsy site. This proposal is also contra proposed Policy EM4 which seeks to resist ‘the loss of prestigious land which has good access to transport links’. In relation to the tests of soundness for the LDP, there are clear issues of a lack of coherence and consistency with Policy H15 and the subject site. Further on the matter of investor interest, having reviewed the site selection/suitability criteria, it appears that there is nothing explicit in the assessment of sites process dealing with the sensitivity of adjacent users. Our client’s offices house some prestigious local employers that include GoCompare, Abriox, Silveret, Beachcroft and Target Group. It is our client’s intentions to further invest in Imperial House and Courtyard to attract similar good quality tenants/employers, as well as there still being space to let at Q2. It is extremely worrying that there is evidence that we have seen from other objectors to the Policy H15 proposal, that the Celtic Way site’s inclusion in the LDP has already had/is having a negative impact on inward investment even at this pre-adoption stage. Given that, should the allocation remain as a proposal and in fact be confirmed in the adopted LDP, then it will undoubtedly continue to have a damaging effect on investment and perhaps retention of existing tenants and undermine Welsh Government’s intentions to further develop land identified in Policy EM1(i).

There are references in the supporting material to the LDP to the site being able to be effectively landscaped and ‘well managed’, but no information on what the latter would mean in practice. Notwithstanding the issues of soundness identified herein, should the allocation continue to be promoted through forthcoming stages of the LDP, it will be essential to communicate the Council’s strategy for a robust landscaping scheme and a Management Plan which is enforced to ensure that the site is indeed well screened and managed and used as intended in terms of transient use and at the scale envisaged.

We look forward to the Council’s response in due course on the matter.

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**Item Question**  | **Council Responses**
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12/02/2014
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It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

The Plan allocates more than enough employment land across Newport to meet its required level of need. The site does not have any current employment use on the site.

The proposal is for a transit site providing temporary short-term accommodation, rather than a permanent place to live. In this context, the adjacent land uses to the Celtic Way site are not considered to be hazardous, however it is agreed that they are not suitable places for children to play. The indicative layout of the transit site will include green areas for play and therefore children will have onsite facilities.

The detailed landscaping required for a proposed Gypsy and Traveller site will be considered at the planning application stage, which will be subject to consultation. It is agreed that management of the site needs to be robust.
**Representation Details**

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Document: Revised LDP, p.76  
Policy: H16.01

Summary: Delete Hartridge Farm Road Gypsy and Traveller site.

**Item Question**  
**Representation Text**

I would like Hartridge Farm Road proposed Gypsy site removed because:

- RSPCA is literally adjacent to the proposed site; these are rescued animals, it would be cruel and noise level throughout the night would be intolerable.

- I feel there would be horrifying consequences if the gypsies were to use the underpass to reach amenities ie Always; it is a very deprived and anti-social area. It is unbelievable to think of the safety issues regarding gypsies and the people of the Always/Ringland estate; there would, undoubtedly, be conflict. I feel it would be signing a death warrant.

- It would totally overtake the local hamlet of just a few houses, which is against all guidelines.

- It is ridiculous for this site to be considered for the biggest site in Europe; please be of mind when this was considered by Scrutiny there was at least one member who did not know what a pitch was; I am of mind there were others who also did not know what a pitch was but voted anyway so it was not in their ward or where they live. (We have evidence of this in writing). Councillor Morris quoted "no one told me what a pitch was"; all Councillors were sent a report as to why the site should not go ahead by Ringland Matters Group (Frank Weston), which stated what a pitch was, this was sent before the Full Cabinet Meeting but appears not to have been read!!!!

- Parents, I feel, would not use these schools being next to such a huge Gypsy site.

- Newport is struggling already, should this go ahead, on the Hartridge Farm Road site, it would seriously damage Newport further. The road access is extremely congested due to two schools very nearby, one being very large. There are no pavements and it turns into a lane near the access proposed.

- Be of mind the gypsies do not want to live near the schools or these huge anti-social estates; I quote again their lives could be in danger.

- Newport is the Gateway to Wales, please do not destroy what little Newport has to offer by placing this in clear view of the SDR.
The draft indicative layout of this site shows that a significant buffer could be provided between the RSPCA Centre and the pitches. A noise assessment has been undertaken for Hartridge Farm Road. It is proposed that a 1.8m high noise attenuation fence is constructed adjacent to the RSPCA Centre, alongside the mainline railway and between the SDR and north-eastern part of the site.

It is acknowledged that the size of the Hartridge Farm Road site is larger than Welsh Government guidance suggests, however this will avoid the need to split any of the individual families, which is an important factor for the families themselves. The site, which would contain fewer pitches than Shirenewton in Cardiff, would not be the largest in the United Kingdom, let alone Europe. The size is sufficient to accommodate all 3 families, which would meet Newport’s residential need for Gypsy/Traveller provision. The proposed layout would use screening to effectively create 3 independent sites within the curtilage of the whole site. The site would also be screened from the road and nearby residential properties.

The site is within the settlement boundary and considered to be a sustainable location. Remote locations outside of the settlement boundary have poorer access to amenities and place more of an emphasis on car travel, therefore deemed to be more unsustainable. Site design can ensure it is well screened from the nearby RSPCA Centre and Llanwern High School.

The site will be well screened and should not impact on Llanwern High School and Ysgol Gymraeg casnewydd. Perception of Gypsy/Travellers at the Schools is something that the Council will need to address through interaction with the Head Teacher and Governors.

It is acknowledged that the Hartridge Farm Road site will require improvements to the access road including the provision of a length of pavement. This will be agreed as part of a planning application and is not considered insurmountable.
However I would like to add that any further improvement could be made to the Plan in protecting Langstone Village from further major development by adding the Countryside north of the A48 that is outside of the boundary settlement, up to and including Old Roman Road, and designate it as a 'Special Landscaped Area'.

The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales’ guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.
### Representation Details

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**Document:** Revised LDP, p.76  
**Policy:** H16.02  
**Summary:** Objection to Former Ringland Allotments Site

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**Item Question**  
**Representation Text**
I write on behalf of the Ringland Community regarding the consultation process for the Gypsy Travellers Site at Hartridge Farm Road, the proposals have resulted in thousands of residents signing a petition against the proposals, their views should be taken on-board during the consultation process and not ignored.

Ringland Allotment Site. The change from the original 5 proposed sites did not give clear valid reasons for them to be revised as such matters of flood planes could be overcome, as the travellers/ Gypsy community have lived on flood planes for the past 45 Years. The only valid reason could be that of the amount of Local opposition toward the sites and the community views were taken into account.

Scrutiny Review: The process of Scrutiny committee review was flawed as it appears now that members of the committee had a clear interest in not choosing sites in their Communities, this has been established with a member of the committee writing to his community in the form of a leaflet stating Langstone is not out of the Woods yet!! He is urging his constituents to write in supporting the new proposed LDP plan so that we as residents of the Ward ensure that the proposals are taken forward. He must have had a clear intention to find an alternative site away from his ward which was one being proposed.

Another member made a statement in Full Council, claiming that he did not know that 43 pitches equated to 120 caravans, on the Hartridge Farm Site. This suggests that he may have not nominated the site if he was made aware of the scale of such an over development and the effect upon local community.

Hartridge Farm Site

The Scale of the Hartridge Farm site goes against the Welsh Assembly good practice guidance notes for the number of pitches allowed. Consultation with Gypsy Travellers were flawed as their preferred option was to stay on the Speedway site, which should be set as an alternative site, also one family wishes to stay on their own site if it is improved and not be all put on one combined site near to the big High School, where there could be anti-social behaviour from both gypsy and local communities, the travellers words at a community meeting.

The council states that Hartridge Farm has a portion of Flood Plain to the South and is within an archeologically sensitive area. Breaching SP3 , Tan 15 and GP8 – CE10

Former Ringland Allotment Site

The former allotment site was removed from the community that used it for growing their own food and the reason given was that it was necessary for future road improvements to the new Housing Development. It is a fact that only one linear metre of land would need to be removed to widen the existing road, this should not have resulted in the allotments closure.

The closure goes against Newport City Council and the Welsh Assembly policy for Community Allotments. If the Allotment site was closed for Road improvements then it stands that the site is not suitable for a Gypsy Travellers site.

The Council say that they have provided an alternative but this is on the new development at Glan Llyn, NOT in Ringland Ward and too far to Walk and carry garden equipment. The Site should be given back to the community for Allotment purposes as residents wishes.

Pylons: The site pose a Health Risk to travellers as Pylon lines are directly overhead, this will also interfere with Radio equipment and TV Reception etc.

Highways issues: the site line fronts directly onto the very busy SDR road which is also under review to be widened under Welsh Assembly review to ease traffic congestion on the M4 motorway. Noise from traffic day and night will affect the residents on the site. Travellers horses will cause a danger if they escape onto the busy road.

Anti-Social Behaviour: The proposed site is directly opposite a housing estate and the community have told me that their will be a potential for continuous anti-social behaviour. The police have records of Youth Anti-social behaviour directly opposite the site and a subway I was involved in trying to help end the antisocial behaviour.
Hartridge Farm Road:

Size and Layout – It is acknowledged that the size of the Hartridge Farm Road site is larger than Welsh Government guidance suggests, however this will avoid the need to split any of the individual families, which is an important factor for the families themselves. The size is sufficient to accommodate all 3 families, which would meet Newport’s residential need for Gypsy/Traveller provision. The proposed layout would use screening to effectively create 3 independent sites within the curtilage of the whole site. The site would also be screened from the road and nearby residential properties.

Location – The site is within the settlement boundary and considered to be a sustainable location. Remote locations outside of the settlement boundary have poorer access to amenities and place more of an emphasis on car travel, therefore deemed to be more unsustainable. Site design can ensure it is well screened from the nearby RSPCA Centre and Llanwern High School.

Current Use – The Road Safety Centre at the site would need to be relocated. The Council will assist with the relocation as best it can. This would be the case for any proposed use of the site.

Proximity to Sewage Pumping Station – No concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

Access – It is acknowledged that the Hartridge Farm Road site will require improvements to the access road including the provision of a length of pavement. This will be agreed as part of a planning application and is not considered insurmountable.

Llanwern High School – The site will be well screened and should not impact on Llanwern High School. Perception of Gypsy/Travellers at the School is something that the Council will need to address through interaction with the Head Teacher and Governors.

Ysgol Gymraeg Casnewydd - The site will be well screened and should not impact on Ysgol Gymraeg Casnewydd. Perception of Gypsy/Travellers at the School is something that the Council will need to address through interaction with the Head Teacher and Governors.

Financial Matters – The Council is aware of the financial implications to its budget.

RSPCA Centre – The draft indicative layout of this site shows that a significant buffer could be provided between the RSPCA Centre and the pitches.

Land Presentation – Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development. Ground re-profiling works will be required at Hartridge Farm Road and the work will add to the development costs, but is not considered insurmountable.

Amenities – It is agreed that the locking of the underpass is something that needs to be avoided in order to ensure access to local amenities. The site is also within a short walk from Newport Retail Park.

Noise – A noise assessment has been undertaken for Hartridge Farm Road. It is proposed that a 1.8m high noise attenuation fence is constructed adjacent to the RSPCA Centre, alongside the mainline railway and between the SDR and north-eastern part of the site.

Potential danger caused by animals – The Council has a duty to provide accommodation for the gypsy/traveller population. We do not have a duty to provide land for horses. The site will be owned and managed by the Council and there is no intention to allow the occupants to keep horses on site.

Aspect – A noise attenuation fence will be constructed alongside the mainline railway and the area will be well screened.

The Process – The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.

Flooding – There are no flood risk issues at Hartridge Farm Road providing a buffer is left at the southern edge of the site adjacent to the railway.

Crime/Perception of Crime – As with any other significant development, the Council has liaised with the police in respect to this site and will continue to consult throughout the detailed design process.
The site will be well managed and the Council will ensure it works closely with the police if any incidents of crime that relate to the site are reported.

Alternative Sites – Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

Regional/Cross boundary issues - As part of the Fordham Assessment research, interviews were conducted with neighbouring residents in order to discuss and establish the impact of cross-boundary movements. The outcomes were factored into the conclusions and recommendations of the report.

The Council must provide sites to meet the need identified for families within its area that require accommodation. Sites should be allocated within the relevant Authority’s area, not in a neighbouring Authority, in the same way as each Authority is required to meet its bricks and mortar housing needs within its own LDP.

There have been informal discussions with South East Wales Authorities about establishing a regional network of transit sites, however there is clear evidence that a transit site is needed within Newport. There is no report yet produced.

House Prices – The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.

It should be noted that, contrary to the statement in this representation, no Gypsy or Traveller families currently live at the Speedway Site.

Former Ringland Allotments:

Health Issues and Pylons - No concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

Location - The site is adjacent to the settlement boundary and considered to be a reasonably sustainable location. More remote locations that are further outside of the settlement boundary have poorer access to amenities and place more of an emphasis on car travel, therefore deemed to be more unsustainable.

Land Presentation – Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development. The results of these surveys have confirmed that some ground re-profiling works will be required at the Former Ringland Allotments. This work will add to the development costs but is not considered to be insurmountable.

Access – Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

Existing Use – There are no allotments on the site. Alternative allotment provision can be investigated if it is demonstrated there is insufficient allotment provision across Newport as a whole.

Aspect – A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

Highway Safety - Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

Environmental – The Council Strategy is a Brownfield led strategy and preference is given to sites which are previously developed. A number of greenfield sites are within the Plan as they are considered appropriate and well located for development. This is why this site is included.

Amenities - It is agreed that the locking of the underpass is something that needs to be avoided in order to ensure access to local amenities.

Flooding – Flood risk at this site is not considered to be a significant risk.

Financial Implications – The Council is aware of the potential financial implications of going ahead with the site. Gallagher Estates have planning permission for their major development in close proximity to the site and although they have submitted representations of concern, they are currently continuing to submit information to enable them to discharge planning conditions and get on site
Privacy and Noise - A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

Potential danger caused by animals - The Council has a duty to provide accommodation for the Gypsy/Traveller population. We do not have a duty to provide land for horses. The site will be owned by the Council and there is no intention to allow the occupants to keep horses on site.

The Process – The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.

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### Representation Details

**Document:** Revised LDP, p.76  
**Policy:** H16.01  
**Summary:** Objection to Hartridge Farm Road site and Former Ringland Allotments site

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**Item Question**  
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Ringland Allotment Site.

The change from the original 5 proposed sites did not give clear valid reasons for them to be revised as such matters of flood planes could be overcome, as the travellers/ Gypsy community have lived on flood planes for the past 45 Years. The only valid reason could be that of the amount of Local opposition toward the sites and the community views were taken into account.

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The process of Scrutiny committee review was flawed as it appears now that members of the committee had a clear interest in not choosing sites in their Communities, this has been established with a member of the committee writing to his community in the form of a leaflet stating Langstone is not out of the Woods yet!! He is urging his constituents to write in supporting the new proposed LDP plan so that we as residents of the Ward ensure that the proposals are taken forward. He must have had a clear intention to find an alternative site away from his ward which was one being proposed.

Another member made a statement in Full Council, claiming that he did not know that 43 pitches equated to 120 caravans, on the Hartridge Farm Site.

This suggests that he may have not nominated the site if he was made aware of the scale of such an over development and the effect upon local community.

Hartridge Farm Site

The Scale of the Hartridge Farm site goes against the Welsh Assembly good practice guidance notes for the number of pitches allowed.

Consultation with Gypsy Travellers were flawed as their preferred option was to stay on the Speedway site, which should be set as an alternative site, also one family wishes to stay on their own site if it is improved and not be all put on one combined site near to the big High School, where there could be anti-social behaviour from both gypsy and local communities, the travellers words at a community meeting.

The council states that Hartridge Farm has a portion of Flood Plain to the South and is within an archeologically sensitive area. Breaching SP3 , Tan 15 and GP8 – CE10

Former Ringland Allotment Site

The former allotment site was removed from the community that used it for growing their own food and the reason given was that it was necessary for future road improvements to the new Housing Development.

It is a fact that only one linear metre of land would need to be removed to widen the existing road, this should not have resulted in the allotments closure. The closure goes against Newport City Council and the Welsh Assembly policy for Community Allotments.

If the Allotment site was closed for Road improvements then it stands that the site is not suitable for a Gypsy Travellers site.

The Council say that they have provided an alternative but this is on the new development at Glan Llyn, NOT in Ringland Ward and too far to Walk and carry garden equipment. The Site should be given back to the community for Allotment purposes as residents wishes. Pylons: The site pose a Health Risk to travellers as Pylon lines are directly overhead, this will also interfere with Radio equipment and TV Reception etc.

Highways issues : the site line fronts directly onto the very busy SDR road which is also under review to be widened under Welsh Assembly review to ease traffic congestion on the M4 motorway. Noise from traffic day and night will affect the residents on the site. Travellers horses will cause a danger if they escape onto the busy road.

Anti-Social Behaviour : The proposed site is directly opposite a housing estate and the community have told me that their will be a potential for continuous anti-social behaviour . The police have records of Youth Anti-social behaviour directly opposite the site and a subway I was involved in trying to help end the antisocial behaviour.

Item Question Council Responses
The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.

It is acknowledged that the size of the Hartridge Farm Road site is larger than Welsh Government guidance suggests, however this will avoid the need to split any of the individual families, which is an important factor for the families themselves. The site, which would contain fewer pitches than Shirenewton in Cardiff, would not be the largest in the United Kingdom, let alone Europe. The size is sufficient to accommodate all 3 families, which would meet Newport’s residential need for Gypsy/Traveller provision. The proposed layout would use screening to effectively create 3 independent sites within the curtilage of the whole site. The site would also be screened from the road and nearby residential properties.

There are no flood risk issues at Hartridge Farm Road providing a buffer is left at the southern edge of the site adjacent to the railway.

It is acknowledged that the site is within an Archeologically Sensitive Area, however development is not considered insurmountable as a result and the necessary consultations and assessments will be undertaken as part of any planning application submission.
Document: Revised LDP, p. 22
Policy: SP08
Summary: Extend Special Landscape Area to the north of Langstone.

**Item Question** Representation Text

Howver, further improvements could be made to the Plan in protecting Langstone Village from further major development by adding the Countryside north of the A48 that is outside of the boundary settlement, up to and including Old Roman Road, and designate it as a 'Special Landscaped Area'.

**Item Question** Council Responses

The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales' guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.
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Document: Revised LDP, p.75
Policy: H15.01
Summary: Objection to Celtic Way Site, suggests A449 depot or Former Ringland Allotments as an alternative.
I would like to place on record my personal objection to the proposed Gypsy/Traveller transit site at Celtic Way, in addition to signing a copy of the residents’ objection letter that you will be receiving at the end of the public consultation period.

The letter is a comprehensive analysis of the situation from the residents’ viewpoint and contains in my opinion, many valid reasons why NCC should not continue with their recommendation of Celtic Way as the preferred transit site location.

The following points are the main issues that I feel should prompt NCC to reconsider its decision:

- the effect it will have on future investment and recruitment for existing nearby businesses
- the effect it will have on attracting further investment and new businesses to the area
- the unsuitability of the site in terms of safety for traveller families due to its industrial surroundings
- the possibility of unauthorised expansion onto nearby land, which would cause safety issues for traveller families and environmental damage to the local area

In addition to my support for the objection letter, I would also like to make the following comments on a purely individual and personal level.

I have heard the following statement from an NCC employee, regarding the gypsy/traveller community: “They have to go somewhere”.

I accept that statement and realise that NCC are obliged to provide these sites which are preferable to unauthorised encampments. I understand that they are more easily managed and controlled by NCC if they are located in a designated area.

However, I would respond to that statement with the following question:

‘Why does the site have to be put in the centre of a growing business park and approximately 300 metres away from a thriving and peaceful residential area?’

I can only assume that NCC has been so thoroughly focused on meeting the official transit site criteria, that it hasn’t been able to fully consider the ramifications and consequences of naming Celtic Way as the preferred location, on the area’s business and residential community.

I find it inconceivable that any council would intentionally commit to a course of action that would send a growing business park and newly thriving area such as Duffryn into decline. I’m sure that NCC is proud of what has been achieved in this area for businesses and residents and would want to capitalise on that for the future good of the city, not disrupt it with an initiative that it will probably never recover from.

This viewpoint may be deemed discriminatory, with the transit site seen as off-putting to investors, workers and house buyers, but the stigma attached to gypsy/traveller camps and their perception in society is absolutely undeniable, regardless of whether this view is acceptable as a valid objection.

I realise that NCC have an extremely difficult job in finding suitable areas for these sites and will always meet objections. However, I would suggest that the level of impact in placing the transit site at Celtic Way, would be considerable and far greater than if it was located at the Ringland Allotments contingency site or the A449 site, if its road/infrastructure issues could be resolved.

I hope that having taken into consideration the concerns of the numerous successful businesses based in Imperial Park and Celtic Springs and after listening to all of the Duffryn and Coedkernew residents’ opinions, that NCC will realise what a tremendous mistake locating the transit site at Celtic Way would be. It would be damaging, not just for Duffryn and Coedkernew, but for Newport as a whole.
Representation Details

13 Council Response

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

The proposal is for a transit site providing temporary short-term accommodation, rather than a permanent place to live. In this context, the adjacent land uses to the Celtic Way site are not considered to be hazardous, however it is agreed that they are not suitable places for children to play. The indicative layout of the transit site will include green areas for play and therefore children will have onsite facilities.

The transit site will be clearly defined, maintained and managed. Any unauthorised expansion onto the SSSI is likely to be dealt with swiftly with Police action, who will be able to move on unauthorised encampments once the Council has a transit site.

The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
I would like to make an objection to the Traveller/Gypsy site at Coedkernew based on the following reasons: The suggested area is in the middle of an industrial park, which has been growing steadily for the last few years and has attracted some blue chip companies to the area providing employment for residents in the immediate areas and surrounding areas. This is a fantastic area of growth for Newport, which in the past has been a deprived area and with the plans for the M4 relief road back on course, I feel that this area should be safeguarded for business investment - bringing investment and employment to the area. Parking for staff in the area is also an issue, who have to park all along the Lake Road side. Should the transient site go ahead, this would increase traffic/vans and caravans into the area where the roads are narrow all along this section. Should a wide load, e.g. a towed caravan be regularly moving through the area - this is likely to cause accidents with vehicles. Surely this area could be make into a parking zone - making the area safer for all who drive in it. I believe that the transient site should be along side the residential site, this seems a more sensible idea to me.

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

The site will be designed as a transit site and therefore only used by Gypsy/Travellers on a temporary basis as they pass through Newport. It is expected that the Gypsy/Travellers will use their vehicles to move around and there will be limited activity in terms of moving around the area on foot. Therefore the fact there is poor street lighting and a lack of pavement is not considered to be a significant concern. Increased street lighting could be provided if Members consider it to be essential.

The vehicles associated with the site will be contained within the site boundary. Highways have not raised an issue with the site and will continue to be consulted at the planning application stage.

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
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**Document:** Revised LDP, p.76  
**Policy:** H16.01  
**Summary:** Objection to Hartridge Farm Road Site

**Representation Details**

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<td>I am parent of two children attending Ysgol Gymraeg Casnewydd and wish to object to the Revised Deposit Local Development Plan and in particular, the proposed gypsy/traveller site at Hartridge Farm Road. From what I have been reading about the Hartridge Farm Road site, nothing seems to have been mentioned about a primary school being right next to it. The site assessments took place during 16th to 20th August 2012 so during the school holidays. Why wasn’t this done during school term time? Has a risk assessment of any kind been done? Has anyone actually looked in to the likely road hazard that this will cause for the travellers families, children attending Ysgol Gymraeg Casnewydd and the residents of Hartridge Farm Road? The SDR roundabout itself is a nightmare so further exits off that is surely a no-no and any entrances/exits of Hartridge Farm Road will cause chaos. YG Casnewydd has a large number of coaches and cars using the school site, due to the fact that children come from across the city, and cars are parked both sides of the road and queuing to get in to the school as well. There is also a nursery on the school site so there are also cars and pedestrians arriving and leaving the school at lunch time. If you then add in to that the travellers taking their own children to and from school at the same time and the fact that there is only one access road, it would be chaos and an accident waiting to happen. It is unlikely that unless the traveller children are already attending a Welsh Medium school or are of nursery or reception age that the traveller children would be able to attend YG Casnewydd, so if the traveller site is going to be as big as it seems then it will mean a large number of the traveller children having to be taken to other local Primary schools. Will Hartridge Farm Road be able to take this? Hartridge Farm Road only has a pavement on the one side so will Newport CC also have to find money for a pavement to be provided and a crossing person employed? There is no pavement on either side further down the lane, past the school and to the RSPCA centre and the road narrows significantly. I have been informed that another site was discounted due to problems with access and the proximity to a local primary school. In particular, there were concerns about the children’s safety. This was highlighted in the scrutiny documents site assessments but YG Casnewydd is not mentioned at all in these documents. How is this site any different? The Hartridge Farm site was discounted by the previous council administration due to its proximity to YG Casnewydd and in particular the nursery. The school hasn’t moved, it is still there, yet this council administration is hell bent in overturning this previous decision. Although the site has been earmarked for residential use, I very much doubt there would be the same number of large families in such a concentrated area on an ordinary housing development as there would be for a traveller site. Has anyone looked at what impact such a large traveller site could have on the schools and the social demographics of the area? This proposed site is too close to a large residential area and conflict will be inevitable. We have already heard rumours of threats from local residents to burn the caravans down and the travellers threatening to retaliate and our children will be in the middle. A frightening thought.</td>
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**Speaking at Public Examination**  
**Soundness of LDP**

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12/2014
The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.

It is acknowledged that the size of the Hartridge Farm Road site is larger than Welsh Government guidance suggests; however, this will avoid the need to split any of the individual families, which is an important factor for the families themselves. The site, which would contain fewer pitches than Shirenewton in Cardiff, would not be the largest in the United Kingdom, let alone Europe. The size is sufficient to accommodate all 3 families, which would meet Newport's residential need for Gypsy/Traveller provision. The proposed layout would use screening to effectively create 3 independent sites within the curtilage of the whole site. The site would also be screened from the road and nearby residential properties.

It is acknowledged that the Hartridge Farm Road site will require improvements to the access road including the provision of a length of pavement. This will be agreed as part of a planning application and is not considered insurmountable.

The site will be well screened and should not impact on Ysgol Gymraeg Casnewydd. Perception of Gypsy/Travellers at the School is something that the Council will need to address through interaction with the Head Teacher and Governors.

In an earlier version of the Local Development Plan, the site was allocated for 290 houses, therefore potentially accommodating 290 families.

As with any other significant development, the Council has liaised with the Police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the Police if any incidents of crime that relate to the site are reported.
3870.L1//H15.01 Beer, Mr Robert

Document: Revised LDP, p.75
Policy: H15.01
Summary: Objection to Celtic Way Site

Item Question Representation Text

10 10 Soundness Test

Unsuitable location of the proposed gypsy transit site - Coedkernew

11 11 Representation

I would request that the proposed gypsy transit site at Coedkernew be reconsidered and removed from the plan. The plan incorporates an area of employment growth to the south of the proposed site which is not too far from a SSSI. If current businesses are objecting to the proposed transit site, how will new businesses be attracted to the area. The location of the proposed transit site will in all likelihood, adversely affect businesses within the area and deter new investment into the area which Newport City Council are attempting to attract. Moreover, we are reliably advised that the site in question would be "well managed" yet when questioned what the management plan was during a consultation meeting, neither Newport City Council nor the attending Counsellors were able to advise.

Item Question Council Responses

13 13 Council Response

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

The transit site will be clearly defined, maintained and managed. Any unauthorised expansion onto the SSSI is likely to be dealt with swiftly with Police action, who will be able to move on unauthorised encampments once the Council has a transit site.

The site is being managed by the Council; arrangements of the management of the site will be established by the Council well in advance of the sites opening.

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
I wish to register my dissatisfaction at your proposal to put a transit gypsy camp at Dyfryn. I do not believe you have given enough justified reasons why Dyfryn is the most suitable site available in the Newport area, it is my belief that you have allowed a number of developers build new houses in the area in the full knowledge that this transit site was on the cards, I wonder if the developers would have built there. I also know for a fact that the houses if sold at all would have been a lot cheaper.

I require by return a full explanation of the selection criteria and names of the other sites considered, with reasons why they were deselected.

The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process. The full details of the selection process can be viewed on the Council’s website.

The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
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Document: Revised LDP, p.75
Policy: H15.01
Summary: Objection to Celtic Way Site

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Robert Hitchins Limited has been investing in this part of Newport for over 15 years, and has carried out a number of developments in the area. The company currently has retained over £35,000,000 of investments in this area and has provided properties for companies to expand into the most notable of these being EADS.

Policy H15 (i) of the Revised Deposit LOP does not meet the necessary tests of soundness relating to coherence and effectiveness and is therefore unsound. The reasons for this are set out in more detail on the continuation sheets below. Our concerns have been separated under the specific tests of soundness for ease of reference.

Test CE1

Policy H15(i) does not accord with the aims and objectives set out elsewhere in the Revised Deposit Plan. In particular, the allocation of a transit site on land at Celtic Way is not consistent with other policies in the LDP that seek to deliver employment growth over the plan period.

Land at Celtic Way forms part of an established employment area in west Newport, which is of local and regional importance. This area has been subject to substantial investment by private developers, the City Council and Welsh Government over recent years and now accommodates a number of prestigious B1, B2 and B8 occupiers within developments such as Celtic Springs, Cleppa Park and Imperial Park. There are also a number of sites within the area that will be developed, or redeveloped, to help deliver future employment growth in Newport over the plan period.

Policy EM1 (i) of the Revised Deposit allocates 65 ha of land for B1 and B2 uses at Duffryn. This allocation includes substantial areas of land adjoining, and adjacent to, the site now proposed for transit use in Policy H15(i). It should be noted that land at Celtic Way formed part of this allocation at the Deposit Plan stage, before being identified as a transit site in the Revised Deposit.

Paragraph 6.6 of the Revised Deposit recognises that "this is a large scale strategic development area ... containing some of the most prestigious employment developments within Newport". The importance of the employment allocation at Duffryn is evident from the Council's response to a recommendation in the Sustainability Appraisal relating to Policy EM1 (i). In response to a suggestion that the allocation should be restricted to previously developed sites, Officers stated that the "plan proposes to allocate a larger area, as the employment site is considered to be of key importance to Newport and the region". Policy EM 1 (iii) also allocates a further 6 ha of employment space at Celtic Springs/Cleppa Park, which is located to the north of land at Celtic Way. This allocation reinforces the importance of the immediate and surrounding area as an employment location locally and regionally.

The allocation of a transit site in the middle of a key employment area for Newport and the surrounding region will undermine the delivery of Policy EM1, and the wider employment strategy set out in Policy SP18. It would lead to the direct loss of land that is firmly established as an employment site. Land at Celtic Way formed part of a planning permission for a wider employment development, and although not built out as part of that scheme remains allocated in the adopted UDP. The site is also being actively promoted for future development by the Welsh Government (which is evident through the emerging LDP process). A report to the Scrutiny Committee for Community Planning and Development on 24 April 2013 recognised that although the land at Celtic Way is currently vacant, the Council had been advised by the Welsh Government (who own the site) "that it has a potential investor interested in the site and the surrounding land". This reiterates that the site remains suitable for employment use. This is reinforced in the same report, which ranks land at Celtic Way as the most 'valuable' of the potential transit sites considered by the Scrutiny Committee. This was based on the current or likely potential alternative use of the site.

The introduction of a transit site in this location would be wholly incompatible with the neighbouring employment uses and sites. Policy H15(i) could therefore impede the operation of both existing and future employment uses in the area due to concerns over inter alia, noise, privacy and highway safety. Such issues are likely to lead to negative impressions and undermine the continued growth and significant investment already made in the area. There are also concerns that transit sites are more difficult to manage than permanent sites and could result in negative impressions of the area, again deterring future investment.

As such, the allocation of a transit site within the centre of a key employment area would undermine the wider aims and objectives of the plan. The policy would therefore fail the appropriate test of soundness set out in CE1.

Test CE2

The allocation of land at Celtic Way as a transit site under Policy H15(i) is not appropriate or based on a robust and credible evidence base. It therefore fails the tests set out in CE2.

The Welsh Government Good Practice Guide in Designing Gypsy and Traveller Sites in Wales (2009) states that when considering site selection and location "the same considerations that are applied to permanent residential sites should be applied to transit sites" (para. 7.1.1). When identifying appropriate locations for transit sites it is...
therefore necessary to refer back to the guidance relating to residential sites. Paragraph 3.2.4 of the Good Practice Guide clearly states that "it is important that if a location is considered inappropriate for residential use, either private or social then it should not be considered appropriate for a Gypsy Traveller site." It continues by advising that gypsy and traveller sites must "receive the same considerations as other forms of accommodation and should not be located in areas which will have a detrimental effect on the general health and well being of the residents." Paragraph 3.2.5 goes on to specifically state that sites should not be considered if they are near industrial and other hazardous locations.

The Council has clearly failed to take account of national guidance when identifying land at Celtic Way as a transit site. As referred to above the proposed allocation at Celtic Way is located within an established industrial area and itself formed part of a wider planning permission granted in relation to the former LG complex. Despite not being built out as part of the wider scheme the suitability of the site for employment uses has been firmly established through its allocation in the adopted UDP (Policy ED1 (i)), and its identification as part of the major employment land allocation set out in Policy EM1 (i) of the Deposit LDP. This allocation is retained in the Revised Deposit LDP, with the exception of the land at Celtic Way now allocated as a transit site (under Policy H 15). The allocation does, however, include a substantial area of land immediately to the south of the proposed transit site. The remaining land adjoining the site to the north (formerly part of the LG site) is also expected to be brought forward by the Welsh Government for further employment uses.

The site is therefore wholly unsuitable for residential development of any kind, being located within close proximity to a range of established and proposed B1, B2 and B8 uses. The allocation would conflict with the operation of existing employment uses in the area, but also place undue restrictions on future employment development on surrounding sites. Bringing forward a transit site in this location would restrict the type, form and operation of future employment developments in the area. Concerns relating to noise, privacy and highway safety impacts arising from placing a residential use in the middle of an established, and growing, employment area are likely to be particularly prevalent. Policy EM1 (i) of the Revised Deposit Plan refers specifically to any future employment developments being compatible with surrounding land uses - clearly the identification of a transit site in the middle of the allocation would greatly restrict its potential.

There are also a number of site specific reasons why the site is not "suitable for use as a transit site. Celtic Way and surrounding roads such as South Lake Drive are not suitable for pedestrian use. They have no pavements or, in the most part, street lighting and given the nature of the surrounding uses the roads are used throughout the day by lorries and vans. This clearly does not create an appropriate environment for pedestrians. These are concerns that have been raised during the assessment process by officers from within the Council and also the police. Indeed, the Council's Streetscene team concluded that "with regard to pedestrian access and movements, there is concern that the site and the surrounding highway of Celtic Way and South Lake Drive do not have footways and pedestrians would be expected to either walk on the carriageway or on the verge adjoining the carriageway. The roundabout and South Lake Drive do not benefit from any street lighting. This gives cause for concern about pedestrian safety and the accessibility of the site by means other than the private motor vehicle". The Council's officers involved in the assessment process concluded that "pavement access is not an essential requirement for transit sites". This is, however, contrary to national guidance.

The Police Liaison Officer (March 2013) also recognised that even if the site is considered as a transit use it "would not be appropriate for children unless they are confined within the boundaries of the site, due to the volume of traffic and heavy goods vehicles in this area". The Officer continued by stating that "children playing outside the boundary would be in danger and could be disruptive to the flow of traffic". This not only raises concerns for the safety of those occupying the transit site, but also the impact it could have on the operation of the surrounding employment uses.

Given its location and the surrounding uses, it would also be difficult to provide occupiers of the transit site with adequate privacy and amenity levels. Again this fails to accord with national guidance, which clearly states that the pitch layout of transit sites achieve the same degree of privacy as for permanent pitches (Para 7.2.3). In a report to the Scrutiny Committee for Community Planning and Development on 29 October 2012 it was concluded that "with enhanced screening and landscaping, the site could have an appropriate level of privacy". Given that the site is surrounded by existing and proposed employment land uses this is likely to be difficult to achieve. It would also be difficult to create an appropriate level of amenity for those utilising the transit site.

We are also concerned about the level of consistency adopted during the site assessment process followed by the Council. This affects the credibility and robustness of the evidence on which Policy H15(i) is based. These inconsistencies are highlighted by numerous examples of sites within other industrial areas being discounted from the process, whereas land at Celtic Way has not been. An example of this can be seen in a report to the Scrutiny Committee for Community Planning and Development on 24 April 2013. This report referred to there being three families currently residing in Newport who require accommodation, with two of the three families currently occupying unauthorised but temporarily tolerated sites in Liswerry. Both sites are referred to as being "not suitable as a residential or transit site. This approach would also be consistent with the conclusions drawn in the same report regarding the former Speedway site at Plover Close. The report states that Members should "be reminded that this site is located within an industrial area and as such is not considered suitable for a residential use ". The same report, however, then goes on to recommend the allocation of land at Celtic Way as a transit site. This follows reference to land at Celtic Way as only being suitable as a transit site "due to its industrial surroundings". This is contrary to national guidance which makes it clear that both
transit and residential uses should be subject to the same considerations when addressing site location. It also demonstrates that the assessment process has been inconsistent, evidenced by the Council ruling out a number of sites given their industrial location, but not doing the same for Celtic Way.

It is also noted that the site at Celtic Way was dismissed as unsuitable as part of an earlier "Long List of Available Sites as at January 2011" prepared by the Council. This list was prepared as part of the assessment of sites under the Deposit Plan and included reference to whether or not sites were potentially acceptable against Welsh Government criteria. In this instance it was correctly determined that the site was not suitable on the basis that it located "on an industrial estate". Whilst the criteria referred to are not listed, it is considered likely that they are the same Welsh Government criteria against which sites included in the Revised Deposit have now been assessed against.

The identification of an appropriate transit site within the LDP should have been based on a robust evidence base and a consistent assessment process. This has, however, not been the case. Despite the Council clearly recognising that the site is not suitable for a residential use, the same has not been applied in terms of transit use. As stated above the location of transit sites should be afforded the same considerations as permanent sites.

The allocation of a transit site within the middle of an established and expanding employment area is clearly not appropriate. This is even more evident given the inconsistencies in the Council's approach to assessing sites within industrial areas. The Council rightly ruled out a number of sites located within such areas, but failed to apply the same logic to land at Celtic Way. Policy H 15(i) is therefore not sound and should be deleted from the plan with an alternative site identified through a consistent and robust site search process.

Conclusion

The site is located within an established industrial area of local and regional importance. This comprises a number of prestigious existing B1, B2 and B8 occupiers and potential for further investment and growth. The site itself formed part of a planning permission relating to a wider employment development and is allocated in the adopted UDP for such uses. Policy EM1 (i) of the Deposit Plan correctly carried forward this allocation.

It is wholly inappropriate to identify land at Celtic Way as a transit site in the Revised Deposit Plan. This decision is contrary to national guidance, which directs gypsy and traveller sites (both residential and transit) away from industrial areas and locations that would not be deemed suitable for other residential uses. It also raises a number of site specific concerns relating to privacy, amenity levels, noise and highway safety for pedestrians. Such a use would be incompatible with existing and future employment uses, thereby potentially restricting future operations, growth and investment in the area.

The decision to allocate the site is also inconsistent with the wider assessment process undertaken by the Council, which saw numerous recorded examples of industrial sites being identified as unsuitable for such development. It is also clear that the Council has ignored national guidance that clearly states that decisions relating to site location should be the same for both transit and permanent residential sites. The allocation of land at Celtic Way in Policy H15(i) is therefore unsound and should be deleted. As a result the Council should reopen the site search process and approach this in a more consistent and objective manner to ensure that the outcomes are sound.

Item Question

Council Responses
It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

The proposal is for a transit site providing temporary short-term accommodation, rather than a permanent place to live. In this context, the adjacent land uses to the Celtic Way site are not considered to be hazardous, however it is agreed that they are not suitable places for children to play. The indicative layout of the transit site will include green areas for play and therefore children will have onsite facilities. The Plan allocates more than enough employment land across Newport to meet its required level of need. The site does not have any current employment use on the site.

The site will be designed as a transit site and therefore only used by Gypsy/Travellers on a temporary basis as they pass through Newport. It is expected that the Gypsy/Travellers will use their vehicles to move around and there will be limited activity in terms of moving around the area on foot. Therefore the fact there is poor street lighting and a lack of pavement is not considered to be a significant concern. Increased street lighting could be provided if Members consider it to be essential.

To clarify transit sites are considered acceptable adjacent to light industrial sites it is not deemed acceptable for permanent residential sites.

The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
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Document: Revised LDP, p.75
Policy: H15.01
Summary: Objection to Celtic Way Site

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Newport City Council Local Development Plan

Representations Details

Newport City Council Revised Deposit Local Development Plan
Gypsy and Traveller Accommodation - Celtic Way, Duffryn (Transit Camp)

I am writing on behalf of Silver Telecom Limited to object to the proposal for a transit camp to be sited at land on Celtic Way, Duffryn, Newport.

Your representation form outlines the tests of soundness which the revised plan must conform to. However, in my opinion, this proposal does not meet the following tests of soundness:

... C1 - it is a land use plan which has had regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.
... C2 - it has regard to national policy.
... C3 - it has regard to the Wales Spatial Plan.
... CE1 - the plan sets out a 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.

LAND AT CELTIC WAY

The land at Celtic Way forms part of a larger business park known as Imperial Park or Duffryn Business Park. This is the premier employment location within Newport and, indeed, one of the strongest business parks in South Wales in terms of critical mass of existing employers and generating enquiries from new, or relocating, businesses.

However, there remain vacant buildings and sites available for occupation and it is important that we retain the highest quality business environment in order that we may attract further high quality corporate investors.

The proposal to allocate the land at Celtic Way for a gypsy and travellers transit camp is, in my opinion, not appropriate. This is due to the fact that there is a significant inconsistency with national and regional planning policy.

Planning Policy Wales (PPW) sets the context for planning in Wales under which Newport City Council is to prepare its Statutory Development Plan. PPW is the principal and authoritative source of national planning policy with the fifth edition issued in November 2012 incorporating amendments to strengthen chapter seven on Economic Development. This latest edition includes a requirement that Local Planning Authorities plan for the whole economy and develop a comprehensive understanding of local economies and wider regional economies. The revision, in November 2012, instructed Local Planning Authorities to ensure that economic benefits associated with development are understood and that there should be recognition that there will be occasions when the economic benefit will outweigh social and environment considerations (para 7.2.2).

Planning Policy Wales, Edition 5, also instructed that Development Plans should include "... policies relating to future development on existing employment sites to protect them from inappropriate development and to use the evidence base to set out an economic vision for the specific area. Indeed, mixed use development is to be promoted only where appropriate.

The Newport LDP Revised Deposit Plan also highlights the key importance of economic growth and Objective 3 states that the Plan seeks to "... enable a diverse economy that meets the needs of the people of Newport and those of the wider South East Wales economic region". In addition, Policy SP18 states that there are available employment sites in West Newport where substantial development has already taken place and the Plan identifies that there are business advantages in locating near to other similar uses. Policy EM1, 6.6, identifies Duffryn as a large scale strategic development area well connected to the M4, containing some of the most prestigious employment developments within Newport. The policy notes that "... there are some areas of development still available on this prestigious site for 81 and 8 2 uses, however, the owner (Welsh Government) has designated the site for single large user projects of a least 10 ha at a time."

I understand that this land is owned by Welsh Government. Can you please confirm whether or not you have their agreement to this change of use? I have also been informed by a professional planning consultant that you do not have the authority to compulsory purchase land owned by the Welsh Government, could you confirm this please.

SPECIFIC COMPANY OBJECTIONS

My company acts as Actuaries, Trustees and Administrators for Self Invested Pension Schemes. We operate throughout the UK and have many overseas clients with total investments exceeding £285 million. We are a bespoke service provider and operate at the top end of our market segment. We are very well respected in the market and our main client base is amongst entrepreneurs and business owners.
We are a growing business providing employment in the area and supporting the local community in many different ways including sponsorship and scholarships. A local transit camp would necessitate significant extra security measures which would drive up costs and affect my competitiveness. This could ultimately affect any expansion plans I might have.

I am very concerned about the health and safety of my employees, many who start early in the morning or work into the evening. Based on previous experience of camps in this area my female employees are terrified of what they might face. My current lease runs out in approximately two years' time. At this point I would seriously consider vacating Imperial Park.

**Item Question**

<table>
<thead>
<tr>
<th>Item Question</th>
<th>Council Response</th>
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<tr>
<td>2 2 Soundness of LDP</td>
<td>It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments. The Welsh Government are the owners of the land NCC will need to continue their discussions with them.</td>
</tr>
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**Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.**
Document: Revised LDP, p.95
Policy: R06
Summary: Revised the District Centre boundary at Malpas Road to include Discovery Retail Park

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<td>6</td>
<td>6</td>
<td>Amend the boundaries of an existing site</td>
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<td>10</td>
<td>10</td>
<td>Soundness Test</td>
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C2, CE2
We write on behalf of our client The Prudential Assurance Company Ltd in relation to the above consultation document. Our client is the owner of Discover Retail Park (DRP), which is located on Barrack Hill and is within the existing boundary of the Malpas Road District Centre, as defined within Newport City Council’s Unitary Development Plan. The property is held in the Prudential (Ex SAL) Property Pension Fund.

Background to the Discover Retail Park and Malpas Road District Centre

Malpas Road District Centre, as currently defined, contains 29 shops/services located in a linear fashion along a 160m stretch of Malpas Road, a petrol filling station and the DRP, constructed in the late 1990s on the site of a former car showroom. DRP contains two large format retail units and customer car park, namely an Aldi food store of 1,159 sq m and a Wickes DIY outlet of 2,653 sq m, which together total approximately 3,812 sq. m of floorspace. Pedestrian integration between the shop ‘parades’ and the extended part of the District Centre that DRP now sits in, is simple and well used, with an internal footpath sited alongside the Aldi store providing safe access to the other shops and services. The Aldi now provides a foodstore anchor for the district centre, and the site’s associated car park is currently unrestricted and therefore provides customers with an opportunity to undertake linked trips within the district centre.

In contrast, on-street car parking along Malpas Road is highly constrained. It is primarily restricted to a small number of parallel parking bays to the front of shops on only the eastern side of Malpas Road. Parking within these spaces is restricted to a period of up to 20 minutes between the hours of 9.30am to 6.00pm Monday to Saturday.

The two stores in DRP clearly complement rather than compete with the remaining shops in the District Centre. Indeed, the businesses such as the hairdressers, newsagents, veterinarian, dentist, bathroom store, restaurant/takeaways, financial services, bookmakers, tattoo parlour etc., all benefit from the anchor that DRP brings to the district centre, and the increase in shoppers it has brought. DRP has clearly enhanced the vitality and viability of the district centre in line with the aims of Planning Policy Wales.

Indeed, in the supporting text of UDP Policy R7 ‘District Centres’ it is noted that the retail units on DRP are an example of a scheme that strengthened the retail function of that centre.

Grounds of Objection

The emerging Local Development Plan (LDP) (Inset Plan 20) proposes the removal of DRP from the boundary of the District Centre. Our client therefore objects to this.

If these modifications are taken forward, they will make the LDP unsound as they do not meet the following tests of soundness in relation to Consistency and Coherence and Effectiveness:

a C2 - It has regard to national policy
b 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.

Ground for Unsoundness A - Not had Regard to National Policy

Annexe 1 of Technical Advice Note 4 (TAN4): Retailing and Town Centres, provides the national policy definition of a district centre as:

"groups of shops, separate from the town centre, usually containing at least one food supermarket or superstore, and non-retail services such as banks, building societies and restaurants " [Emphasis added].

It is clear that the de-allocation of the only food supermarket on Malpas Road from the District Centre boundary is completely at odds with the vision of District Centres provided by the Welsh Government.

The Aldi is a relatively modest sized supermarket when compared, for example with the Tesco Extra at the Newport Retail Park that extends to approximately 6,300 sq m. The Aldi is therefore much more in keeping with the policy set out in paragraph 10.2.9 of PPW, which states that:

Smaller scale retail provision, including appropriately sized supermarkets, leisure facilities, and other facilities such as local health centres, branch libraries, area offices of the local authority and primary schools should preferably be located in district, local and village centres.
The proposed exclusion of the Aldi foodstore from the District Centre is clearly contrary to National policy and therefore currently renders the proposed LDP unsound.

Ground for Unsoundness B - Not Supported by Robust and Credible Background Evidence

The decision to remove DRP from the Malpas Road District Centre appears to have come from recommendations within the District Centres Background Paper April 2012 (Updated June 2013) published by Newport City Council, in preparation for the LOP. The only justification for the exclusion of DRP from the district centre that is contained within the document is as follows:

"The units are not of a size or style that would usually be associated with a district centre and are physically separate from the traditional element of the centre, with their own access and car parking arrangements" (paragraph 13.4, pg. 40).

This view is clearly contradictory to the advice contained within TAN4 and PPW, as discussed above.

Likewise, to suggest the removal of DRP on the basis of the format of the retail units being 'not usually associated with a district centre' would result in an inconsistent approach being taken by the Council, as other district centres are being promoted in the LDP with these types of units. For example, Commercial Road District Centre, predominantly consists of small shops set out in a linear formation along Commercial Road, however that district centre also contains a large format Asda store that is located to the east of the main row of shops and remains included within the district centre proposed within the LDP. Furthermore, Newport Retail Park, which is entirely comprised of large scale retail warehouse stores, is also being designated as a district centre.

Consequently, we deem that the removal of DRP on the basis of the size and styles of the units not usually being associated with a district centre would be unsound, due to a lack of evidence being provided to support this notion and inconsistencies with other district centres being promoted in the plan.

No change in circumstances has been demonstrated from the previous position, when DRP was included within the district centre in the UDP, and lauded as 'strengthening the retail function of that centre', to its now proposed exclusion. The proposed exclusion of DRP from the District Centre Is not based on robust or credible background evidence, and therefore currently renders the proposed LDP unsound.

As currently drafted, we consider that the Revised Deposit Local Development Plan is unsound in respect of Inset Map 20. We therefore request that you revise the proposed boundary to continue to include DRP within Malpas District Centre, consistent with the existing boundary in the adopted UDP.

Our client reserve the right to participate in the forthcoming public examination to discuss the issues raised in more detail.

To ensure we can fully explain our grounds of objection to the Inspector.

Our client reserve the right to participate in the forthcoming public examination to discuss the issues raised in more detail.

The preparation of the Local Development Plan is an appropriate time to review boundaries defined in the Plan. Accordingly a review of all the district centre boundaries has been undertaken for the preparation of the LDP. With regards to Discovery Park, Malpas, the units are not of a size or style that would usually be associated with a district centre and are physically separate from the traditional element of the centre, with their own access and car park arrangements. No change is proposed to the Plan.
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<td></td>
<td>01/08/2013</td>
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Document: Revised LDP, p.75
Policy: H15.01
Summary: Objection to the Celtic Way gypsy/traveller site
We refer to the council's proposal to locate a Gypsy & Travellers Transit Camp in Celtic Way, Duffryn and we set out our fundamental objections to this proposal below.

Quinn Radiators’ Contribution to the Local Economy
We would firstly like to give a brief background on Quinn Radiators and its significant contribution to the local economy.

- Quinn Radiators manufacture radiators for the domestic and commercial heating markets in our world leading state of the art U30m manufacturing facility in Imperial Park which is located directly opposite the proposed Gypsy & Traveller Transit Camp.
- We manufacture and sell in excess of 1.3m radiators per year across the UK and Europe.
- We currently employ in excess of 250 people in Newport with an annual wage bill of £8.5m contributing significantly to the local economy.
- Our rates bill to Newport City Council is in excess of £1.2m per annum.
- Much of the materials and services used in our manufacturing processes are locally sourced e.g. 100% of our steel spend is locally sourced in Port Talbot, 95% of transport services to our customers across UK and Europe is provided by locally based hauliers.
- Quinn Radiators has ambitious plans to expand and grow its business over the next 5 years.

Quinn Radiators’ Objection to the Proposed Gypsy & Travellers Transit Camp in Celtic Way.

In the first instance we confirm our categorical and unreserved support for the letter of objection submitted on behalf of local businesses by Jones Lang LaSalle on 24th July 2013.

We set out our further objections below;

1. Suitability of Celtic Way. The proposal is to locate the Transit Camp within Imperial Park, a large scale strategic business development area, as set out in EM1, 6.6, which houses high quality leading businesses including Quinn Radiators, Next Generation Data, ALUKand Smiths News. This Manufacturing, Science & Technology Park is wholly unsuitable for the introduction of a Gypsy & Traveller Transit Camp. Businesses like ourselves were originally attracted to this park not only with government support but also due to the availability of a high quality business environment and supporting infrastructure, and its ability to attract a high quality workforce.

It is vital that further high quality businesses are attracted to Imperial Park to ensure continued development of the business environment & infrastructure. This can only lead to further increases in employment for Newport. Be assured that should the Transit Camp be located in Celtic Way it will have a seriously detrimental impact on Newport's ability to continue to attract, or indeed retain, business within Imperial Park. It is fundamental to Quinn Radiators business operations that further investment in the local infrastructure and the continued availability of a skilled workforce remains open to it in Imperial Park.

2. Planning Policy Wales November 2012 revision instructs Local Planning Authorities to ensure that there is recognition that there will be occasions when the economic benefit will outweigh social considerations....I suggest strongly that this is one of those occasions. In addition Planning Policy Wales, Edition 5 also instructs that Development Plans should include policies relating to future development on existing employment sites to protect them from inappropriate development..... I suggest strongly that the location of the Transit Camp in Celtic way is an inappropriate development in this context.

3. Prospects for Business Growth. As mentioned earlier Quinn Radiators has ambitious plans to double its business in the UK within the next 5 years. Kyeo achieving this growth is the continued support of our Group Board and our Investors. This business growth is fundamental to the future success of our business. This support will not be guaranteed where we have real concerns about the security of our facilities, concerns about Health & Safety within the immediate vicinity of our plant, significantly increased concerns about trespass on our site, concerns about potential interference to our electricity, gas and water supplies and doubts about our continued ability to attract the calibre of skilled workforce we require to support our growth. Locating the Transit Camp in Celtic Way opposite our factory will crystallise these concerns.

4. Security Issues. Whilst I am sure most travellers are law abiding individuals, unfortunately problems associated with Travellers in regard to trespass, vandalism and the theft of property are well documented. Quinn Radiators already has had experience of property damage, trespass and property theft when travellers illegally occupied the land across the roundabout from the proposed site and land adjacent to Church lane on the west side of its facility. Some examples are as follows;
<table>
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<tr>
<th>Date</th>
<th>Incident Description</th>
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<tr>
<td>June 2008</td>
<td>- 3 teenagers from adjacent travellers camp were trespassing on our site and had to be remove from site by security staff.</td>
</tr>
<tr>
<td>June 2008</td>
<td>- At 22.50 on 16th June approximately 15 horses were on the road at Westgate side of the facility causing a near miss with a HGV delivering steel to site and cars to brake hard to avoid hitting the animals near the roundabout. Horses also gained access to our site. Police attended 768.16/6/08.</td>
</tr>
<tr>
<td>August 2008</td>
<td>- 2 teenage travellers were stopped on their way out of the factory canteen by our security office who was threatened with a piece of wood. Police attended 772/30/08/08.</td>
</tr>
<tr>
<td>May 2009</td>
<td>- 6 travellers were removed from our premises by security personnel having gained entry by cutting our fence.</td>
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These are just a sample of incidents that have occurred which substantiate and validate our points made above at 1B4 but in particular our concerns about security.

In order to protect its premises, property and the property of its employees Quinn Radiators will need to significantly enhance its security arrangements. This could cost the business in excess of £100,000 per annum, a cost that Quinn Radiators can ill afford within the highly competitive markets in which it operates.

5. Health & Safety. The council has a duty of care to 'residents' within the community to ensure that environments are safe and that health and safety risks do not arise. The Welsh Government states clearly in its document Designing Gypsy and Traveller sites Good Practise Guide 2008 the following:

- **Section 3.1 (page 14)** "It is essential to ensure that the location of a site will provide a safe environment for the residents. Sites should not be situated near...industrial processes or other hazardous places...to ensure health and safety of prospective residents is not at risk".
- **Section 8.4 (page 44)** "the presence of children on the site and potential health and safety risk for them and other residents should receive equal consideration for transit sites".
- **Section 3.10 (page 15)** "sites adjacent to light industrial areas therefore tend not to be popular...because of safety fears".

We feel the proposed Transit Camp at Celtic Way does not satisfy the above criteria as follows:

- 24/7 entrance / exiting of HGV and commercial vehicles to our premises via the roundabout where the transit camp is proposed to be located.
- Access of employee personal vehicles to our site on a 24/7 basis.
- There are no pavements on the highway so pedestrian access is via a road with a 40 mph speed limit.
- The road and surrounding areas have poor street lighting.
- In the council's own Gypsy & Traveller Accommodation, Revised Deposit Plan dated June 2013, The NCC Streetscene expressed "concern that the site and surrounding highway of Celtic Way and South Lake Drive do not have footways and pedestrians would be expected to either walk on the carriageway or on the verge adjoining the carriageway. The roundabout and South Lake Drive do not benefit from street lighting. This gives cause for concern about pedestrian safety and the accessibility of the site by means other than by private motor vehicle." The planning officer's response to this concern was that as it was a transit site then by definition the families would have access to motor vehicles. This appears to suggest that the families or their children would never walk on the highway which we consider will be extremely unlikely and certainly should not be an assumption when assessing health & safety risks.
- Our manufacturing and warehousing facility operates at high levels of activity both from a vehicular movement and health & safety perspective and as such there are significant health and safety risks to non-Quinn employees who may enter our site unaccompanied and/or unauthorised.
- An electricity substation is within 0.3 miles.
- The area is known locally as 'Celtic Lakes' with 13 areas of open water within 680m. The nearest being only 22m with a total surface water area of 38276m².

The Police Report within the Gypsy and Traveller Site: Site Appraisal and Scrutiny Review appendix 4 (page 46) referencing the proposed site states "...this site would not be appropriate for children unless they are confined within the boundary of the site, due to the volume of traffic and heavy goods vehicles in this area.....children playing outside the boundary would be in danger and could be disruptive to the flow of traffic" which I/we feel would be a significant risk in such an area.

All of the above must give rise to significant concerns about Health & Safety for the traveller community should the Transit Camp be located in Celtic Way.

In summary Quinn Radiators view the proposal to locate the Transit Camp outside its facility in Imperial Park with the utmost concern. We have outlined out objections to this proposal above and strongly request that these are considered carefully before Newport City Council makes any final decision.

We also strongly advise that careful consideration be given to potential overspill of 'in-transit' travellers onto adjoining vacant land once the proposed transit site is full.

I confirm that I am quite prepared to speak at a Hearing Session of the Public Examination if required to present the case for defeating the proposal on behalf of businesses in Imperial park.
### Representation Details

*by:* (No grouping)  
*Filtered to show:* (all of) Stage=L; Status=M  

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#### Item Question

**Soundness of LDP**

- **Tick-box reply**: No

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**Council Responses**

13 **Council Response**

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council's duty and enabling the Police to use its powers to move on other unauthorised encampments.

The proposal is for a transit site providing temporary short-term accommodation, rather than a permanent place to live. In this context, the adjacent land uses to the Celtic Way site are not considered to be hazardous, however it is agreed that they are not suitable places for children to play. The indicative layout of the transit site will include green areas for play and therefore children will have onsite facilities.

The site will be designed as a transit site and therefore only used by Gypsy/Travellers on a temporary basis as they pass through Newport. It is expected that the Gypsy/Travellers will use their vehicles to move around and there will be limited activity in terms of moving around the area on foot. Therefore the fact there is poor street lighting and a lack of pavement is not considered to be a significant concern. Increased street lighting could be provided if Members consider it to be essential.

The Electricity Sub Station is fenced in and secure. There are numerous homes within Newport which are within 0.5 miles of a railway line.

Development alongside water can enhance the setting of an area. Safety around lakes is something that children from all cultures need to be aware of and is not considered an obstacle to development.

As with any other significant development, the Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.

The transit site will be clearly defined, maintained and managed. Any unauthorised expansion onto the SSSI is likely to be dealt with swiftly with Police action, who will be able to move on unauthorised encampments once the Council has a transit site.

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
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Document: SA at Revised Deposit Plan, p.75
Policy: General G&T
Summary: Supportive of Plan with protection of rural communities and location of Gypsy and Traveller sites outside of Langstone.

**Representation**

As both a resident and Ward Councillor for Langstone ward I would like to make the following three comments regarding the revised LDP:

On the whole I welcome and endorse the contents of this this comprehensive document. As a resident of Langstone Ward and more specifically Llanvaches village I appreciate that the LDP goes a long way to protecting this mainly rural area and the surrounding countryside as well as planning for future population and business growth within the city.

Like many residents of the city I believe that the siting of the Gypsy and Traveller sites remains a highly controversial issue. I am pleased and relieved that after the previous consultation it was realized by the council that Langstone village was not a suitable location for these sites. I retain reservations about the wisdom and practicalities of siting the G&T sites in the adjacent wards of Llanwern and Ringland and am aware that strong objections have been raised that may subsequently prove the site(s) and therefore the LDP as a whole unsound.

Note however that I do not and will not accept that Langstone itself becomes the ‘fall back’ site, as has been suggested by some NCC officials and members, in any potential further revision to the LDP.

**Council Response**

Support noted.
Document: Revised LDP, p.22
Policy: SP08
Summary: Propose amendment to SLA at Langstone.

In line with my fellow ward councillor I also believe further improvement could be made to the Plan in protecting ‘Langstone Village’ from further major development specifically by adding the Countryside north of the A48 that is outside of the boundary settlement, up to and including Old Roman Road, and designate it as a ‘Special Landscaped Area’.

The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales’ guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.
### Representation Details

**Document:** Revised LDP, p.41  
**Policy:** GP03  
**Summary:** Highlight issues with sewerage and water infrastructure within Llanmartin area.

#### Item Question  
**Representation Text**

As I reported in my previous report the water supply to my house is low, so low it cost us a double garage, there was not enough pressure for the fire brigade to draw on they had to leave us and get water from the Old Barn Inn. (The garage burned to the ground).

The sewage is under heavy pressure the house at the end of our line are on a controlled cess pit, it stores, the contents until 12pm and then releases it.

Last have you considered the cost to your rates, there are housing site appropriate that are probably worth £600,000 they will look for a reduction.

#### Council Response  
**Comments noted.**

---

### Representation Details

**Document:** Revised LDP, p.75  
**Policy:** General G&T  
**Summary:** Propose continue to use fields in Goldcliff for Gypsy and Traveller accommodation.

#### Item Question  
**Representation Text**

I have noticed for the past 26 years a number of mobile homes parked in the fields on the Gold Cliff Road, they seem to be quite content there so why not use that land.

#### Council Response  
**Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.**
### Representation Details

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Document: Revised LDP, p. 75  
Policy: General G&T  
Summary: Support for Gypsy and Traveller site allocations in LDP

#### Item Question  Council Responses

**11 Representation**  
Having been made aware of the revisions to the above plan and in particular reference to the location of the Gypsy and Traveller sites as set out in the plan, is acceptable, and I accept and approve the Revised Deposit Local Development Plan.

**13 Council Response**  
Support noted
Representation Details

by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M
Rep'n/Para/Policy Agent Accession No Date Lodged Late? Source Type Mode Status Status Modified
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3878.L2//SP08 Williams, Mr Stephen 26/07/2013 P C M

Document: Revised LDP, p.22
Policy: SP08
Map: Proposals East: Proposals Plan - East
Summary: Extend Special Landscape Area to the north of Langstone

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Item Question Representation Text
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11 11 Representation
However, further improvements could be made to the Plan in protecting Langstone Village from further major development by adding the Countryside north of the A48 that is outside of the boundary settlement, up to and including Old Roman Road, and designate it as a 'Special Landscaped Area'.

---

Item Question Council Responses
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13 13 Council Response
The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales’ guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.

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3879.L1//H15.01 Parry, M & C 26/07/2013 P O M

Document: Revised LDP, p.75
Policy: H15.01
Summary: Object to proposed Gypsy and Traveller site at Celtic Way.

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Item Question Representation Text
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11 11 Representation
The full consultation comments are available to view against representation reference 3820.L1

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Item Question Council Responses
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13 13 Council Response
The Council response to this representation can be found against representation 3820.L1
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<tr>
<th>Representation Details</th>
<th>Newport City Council Local Development Plan</th>
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<td>3879.L2/H15.02</td>
<td>Parry, M &amp; C</td>
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<td><strong>Document:</strong> Revised LDP, p.75</td>
<td><strong>Policy:</strong> H15.02</td>
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**Item Question** Representation Text

**11 11** Representation

The full consultation comments are available to view against representation reference 3820.L2.

**Item Question** Council Responses

**13 13** Council Response

The Council response to this representation can be found against representation 3820.L2.

| **Rep'n/Para/Policy**  | **Agent**  | **Accession No** | **Date Lodged** | **Late?** | **Source** | **Type** | **Mode** | **Status** | **Status Modified** |
|------------------------|--------------------------------------------|
| 3879.L3/General        | Parry, M & C | 26/07/2013   | O   | M   |
| **Document:** Revised LDP, p.75 | **Policy:** General G&T | **Summary:** Propose two new sites as Gypsy and Traveller accommodation at A449 and Tredegar House Caravan Park. |

**Item Question** Representation Text

**11 11** Representation

The full consultation comments are available to view against representation reference 3820.L3.

**Item Question** Council Responses

**13 13** Council Response

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
### Representation Details

**Document:** Revised LDP, p.75  
**Policy:** H15.01  
**Summary:** Object to proposed site at Celtic Way for proposed Gypsy and Traveller site.

#### Item Question  Representation Text

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#### Speaking at Public Examination

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### Representation Details

**Document:** Revised LDP, p.75  
**Policy:** H15.02  
**Summary:** Support use of former Ringland Allotments as alternative Gypsy and Travellers site to that proposed at Celtic Way.

#### Item Question  Representation Text

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Representation Details

Document: Revised LDP, p.75
Policy: General G&T

Summary: Propose two new sites, A449 and Tredegar House Caravan Park, as alternatives to site proposed at Celtic Way.

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**3880.L3//General**

Davies, Ryan & Sophie

Document: Revised LDP, p.75
Policy: General G&T

Summary: Propose two new sites, A449 and Tredegar House Caravan Park, as alternatives to site proposed at Celtic Way.

**Representation**
The full consultation comments are available to view against representation reference 3820.L3.

**Speaking at Public Examination** Yes

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**Council Response**
Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

---

**3881.L1/H15.01**

Perrott, Mr & Mrs

Document: Revised LDP, p.75
Policy: H15.01

Summary: Object to site proposed for Gypsy and Traveller accommodation at Celtic Way.

**Representation**
The full consultation comments are available to view against representation reference 3820.L1

**Speaking at Public Examination** Yes

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**Council Response**
The Council response to this representation can be found against representation 3820.L1
Representation Details

by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M

Rep'n/Para/Policy | Representor | Agent | Accession No | Date Lodged | Late? | Source | Type | Mode | Status | Status Modified
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3881.L2/H15.02 | Perrott, Mr & Mrs | | 26/07/2013 | P O I M | | | | | | |

Document: Revised LDP, p.75
Policy: H15.02
Summary: Support use of former Ringland Allotments for use at Gypsy and Traveller site as an alternative to site at Celtic Way.

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Representation Text

The full consultation comments are available to view against representation reference 3820.L2.

---

Speaking at Public Examination Yes

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Council Response

The Council response to this representation can be found against representation 3820.L2.

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3881.L3//General | Perrott, Mr & Mrs | | 26/07/2013 | P O I M | | | | | | |

Document: Revised LDP, p.75
Policy: General G&T
Summary: Propose to new sites at A449 and Tregegar House Caravan Park as an alternative to site proposed at Celtic Way.

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Representation Text

The full consultation comments are available to view against representation reference 3820.L3.

---

Speaking at Public Examination Yes

---

Council Response

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
Item Question  | Representation Text
--- | ---
11 | We believe that the revised LDP is unsound and should be changed.
We detail below reasons we feel make the revised plan unsound:
1) The revision follows the placing on deposit of the original LDP in 2012 and we are of the opinion that changes can only be made by an appointed inspector. These changes to the plan are by way of direction and the Council must follow them. In this instance the changes have been made prior to the appointment of an inspector. Therefore the original plan should have gone forward to examination.
2) The proposal of the gypsy and travellers site at Hartridge Farm Road breaches the maximum number of pitches laid out in Welsh Assembly Guidelines. The revised LDP has the site with 43 pitches whereas the guidelines suggest a maximum of 20.
3) We feel that the residents around the proposed site would have the value of their properties blighted. The general conception of gypsy and travellers would make the houses unsaleable. A property next to a permanent site in Cardiff has not been sold and the owners who have had prospective purchasers visit the property have had no offers due to the house being adjacent to the gypsy site. Also insurance costs would be affected by the stigma of a travellers site with both household and car premiums increasing.
4) There is no legislation that states a large traveller family needs to be based on one site. The Hartridge Farm Road site has been "cherry picked" to keep all the families on one site so that and I quote" this will prevent all the pain spreading to other areas." This is not how a site should be designated if objectors are expected to put forward alternative sites we would suggest returning to the carefully considered original sites which were recommended by both planners and councillors. These sites have already been appraised by the previous administration. We would add an additional site that of the old speedway site which was not available when the original five were proposed. This site has also been favoured by the travellers.
Also the old Whitehead/Godins works on Mendalgief Road and possibly the old Sainsbury site on Malpas Road could be alternatives.
We reiterate that we feel the Revised LDP to be unsound and should be withdrawn in favour of the original LDP dated April 2012.
In response to representations received on the Deposit Local Development Plan (LDP) and in response to the outcome of the Scrutiny Committee review of gypsy and traveller sites, a number of changes to the LDP were required. Welsh Government has provided clear guidance on the very limited extent of amendments that can be considered as 'Focussed Changes' to the Plan. Consequently, in accordance with Welsh Government's advice, the required changes have been incorporated into a Revised Deposit LDP.

It is acknowledged that the size of the Hartridge Farm Road site is larger than Welsh Government guidance suggests, however this will avoid the need to split any of the individual families, which is an important factor for the families themselves. The size, which would contain fewer pitches than Shirenewton in Cardiff, would not be the largest in the United Kingdom, let alone Europe. The size is sufficient to accommodate all 3 families, which would meet Newport’s residential need for Gypsy/Traveller provision. The size is sufficient to accommodate all 3 families, which would meet Newport’s residential need for Gypsy/Traveller provision.

The proposed layout would use screening to effectively create 3 independent sites within the curtilage of the whole site. The site would also be screened from the road and nearby residential properties. A noise assessment has been undertaken for Hartridge Farm Road. It is proposed that a 1.8m high noise attenuation fence is constructed adjacent to the RSPCA Centre, alongside the mainline railway and between the SDR and north-eastern part of the site.

The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
Document: Revised LDP, p.65
Policy: H01
Summary: Object to proposed sites at Long Meadow (Cayo) and land to the rear of the Rock and Fountain.

11 11

Representation
I understand that a request has been made to include two areas of land within the Llanvaches Local Development Plan. I object strongly to these being included in the LDP for Llanvaches. One is for a proposed residential development to the rear of the Rock and Fountain. As has already been noted by the Council, this site is detached from the village of Llanvaches and is in a remote unsustainable location. I request this area of land to remain as countryside in the LDP and for the land to be protected from development. A second proposal is for houses on Long Meadow (between Rectory Road and the Cayo). Again, I request this area of land to remain as countryside in the LDP and for the land to be protected from development. The number of new houses from both of these sites would change the character of Llanvaches. I aver that the existing village boundary (as amended to exclude the football and playing fields) is appropriate as it stands in the UDP.

Given its remote location and lack of public transport, Llanvaches is not the type of village where development should be encouraged. Further, the main method of transport in and out of the village is by car. The village infrastructure in terms of access roads would not support the proposed developments; the disturbance involved with such significant developments would also put a huge strain on the village. Llanvaches is a village characterised by being rural, quiet, low crime, and with modest development limited to infill and sympathetic barn conversions. Given its remote location, poor infrastructure and roads, and lack of public transport, Llanvaches is not the type of village where significant development should be encouraged.

Further, I submit that all of the housing needs identified currently are adequately met by other development sites already identified, and if more sites are needed, I suggest that the Council should look to locate developments on brownfield sites in sustainable locations. I therefore request that the areas of land surrounding the current boundary remain as countryside in the LDP.

13 13

Council Response
Opposition to the development at Llanvaches noted.
I understand that a request has been made to include two areas of land within the Llanvaches Local Development Plan. I object strongly to these being included in the LDP for Llanvaches.

One is for a proposed residential development to the rear of the Rock and Fountain. As has already been noted by the Council, this site is detached from the village of Llanvaches and is in a remote unsustainable location. I request this area of land to remain as countryside in the LDP and for the land to be protected from development.

A second proposal is for houses on Long Meadow (between Rectory Road and the Cayo). Again, I request this area of land to remain as countryside in the LDP and for the land to be protected from development. The number of new houses from both of these sites would change the character of Llanvaches. I have lived here for over 30 years and aver that the existing village boundary (as amended to exclude the football and playing fields) is appropriate as it stands in the UDP. Given its remote location and lack of public transport, Llanvaches is not the type of village where development should be encouraged. Further, the main method of transport in and out of the village is by car. The village infrastructure in terms of access roads would not support the proposed developments; the disturbance involved with such significant developments would also put a huge strain on the village.

Llanvaches is a village characterised by being rural, quiet, low crime, and with modest development limited to infill and sympathetic barn conversions. Given its remote location, poor infrastructure and roads, and lack of public transport, Llanvaches is not the type of village where significant development should be encouraged. Further, I submit that all of the housing needs identified currently are adequately met by other development sites already identified, and if more sites are needed, I suggest that the Council should look to locate developments on brownfield sites in sustainable locations. I therefore request that the areas of land surrounding the current boundary remain as countryside in the LDP.
I am writing to Newport City Council to put in my objection to the proposed site of Hartridge Farm Road as a Gypsy Traveller site. I do understand that these sites for travellers are needed but to think of having them on a dual carriageway and an area that floods is quite unbelievable. They need to be in an area that is not so populated which would suit both parties. NCC has just built an outstanding school (Llanwern High) and to put this site right next door seems ludicrous. So many people have told me that they intend to take their children out of this school and that would be criminal as the students in this newschool are so enthusiastic and full of self esteem that to have to pass this site every day would have a real negative impact on them. That goes for the Welsh School as well. Ringland is classed as a deprived area with Flying Start in both Ringland and neighbouring Alway schools, to put this site so close to an already overpopulated area would have an enormous negative effect. There is also near this site the sewerage pumping system which would definitely not be the right place to put this site. It has been fenced off for many, many years. My last point is the closeness to the thriving Spytty Retail Park which is an absolute credit to Newport and extremely busy on all days of the week especially weekends. To have to pass this proposed Gypsy Traveller site on Hartridge Farm Road to get to Spytty could put a lot of people off going there especially people like myself who often walk to the shops. I strongly urge you to rethink this site and try and position it in a more rural area which is what the Gypsy and Traveller community want. I would like to propose the A449 site or the old Whitehead Works site on Mendelgief Road. The A449 is rural and the other is not so populated.

The site is within the settlement boundary and considered to be a sustainable location. Remote locations outside of the settlement boundary have poorer access to amenities and place more of an emphasis on car travel, therefore deemed to be more unsustainable. Site design can ensure it is well screened from the nearby RSPCA Centre and Llanwern High School.

There are no flood risk issues at Hartridge Farm Road providing a buffer is left at the southern edge of the site adjacent to the railway.

The site will be well screened and should not impact on Llanwern High School or Ysgol Gymraeg Casnewydd. Perception of Gypsy/Travellers at the Schools is something that the Council will need to address through interaction with the Head Teacher and Governors.

With regards to the pumping station, no concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
I am writing to object to the proposed Gypsy Traveller Transit site on the old Ringland Allotments. Not only is it on a busy dual carriageway but right in the middle is a huge electricity pylon. That can't be healthy! I know many people who have requested an allotment and they are still waiting for an answer off the council. Can you tell me why these allotments were taken away?? The road is a very busy one and this proposed site is right on the roadside which over the years has seen its share of fatalities and with travellers owning many species of animals I feel this site is far to near the road and very dangerous. I think a more rural area would be better for all concerned as the Gypsy Travellers have said that they do not want to go on this site.
Health Issues and Pylons - No concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

Location - The site is adjacent to the settlement boundary and considered to be a reasonably sustainable location. More remote locations that are further outside of the settlement boundary have poorer access to amenities and place more of an emphasis on car travel, therefore deemed to be more unsustainable.

Land Presentation – Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development. The results of these surveys have confirmed that some ground re-profiling works will be required at the Former Ringland Allotments. This work will add to the development costs but is not considered to be insurmountable.

Access – Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

Existing Use – There are no allotments on the site. Alternative allotment provision can be investigated if it is demonstrated there is insufficient allotment provision across Newport as a whole.

Aspect – A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

Highway Safety - Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

Environmental – The Council Strategy is a Brownfield led strategy and preference is given to sites which are previously developed. A number of greenfield sites are within the Plan as they are considered appropriate and well located for development. This is why this site is included.

Amenities - It is agreed that the locking of the underpass is something that needs to be avoided in order to ensure access to local amenities.

Flooding – Flood risk at this site is not considered to be a significant risk.

Financial Implications – The Council is aware of the potential financial implications of going ahead with the site. Gallagher Estates have planning permission for their major development in close proximity to the site and although they have submitted representations of concern, they are currently continuing to submit information to enable them to discharge planning conditions and get on site and build.

Privacy and Noise - A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

Potential danger caused by animals - The Council has a duty to provide accommodation for the Gypsy/Traveller population. We do not have a duty to provide land for horses. The site will be owned by the Council and there is no intention to allow the occupants to keep horses on site.

The Process – The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.

Crime/Perception of Crime – As with any other significant development, the Council has liaised with the police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the police if any incidents of crime that relate to the site are reported.

Alternative Sites – Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

House Prices – The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.
### Representation Details

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**StockBO'Neill, Ms Alex**

**Document:** Revised LDP, p.76

**Policy:** H16.02

**Map:** Proposals East: Proposals Plan - East

**Summary:** Object to Gypsy and Traveller site in LDP.

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Additional material submitted - Please click here

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I am a 20 year old girl living in Ringland and am unhappy with the LDP revised deposit plan June 2013. I am unhappy with the proposed gypsy traveller sites positioned on Hartridge Farm Road and former Ringland Allotments, and feel strongly that these sites are unsuitable for both parties (gypsy community and neighbouring residential community). I feel the proposed sites go against what the overall LDP is trying to achieve. Although I fully support the need for the Gypsy and Traveller Sites within the City, I feel these two sites have been selected against the criteria provided by the Welsh Government guidance as set out in WAG Circular 30/2007.

Ringland Allotments
- Pylon
- Location
- Access
- Existing Use (Allotment act 1925)
- Environment
- Underpass / Subway
- Overpopulated / Deprived area (Welsh Government Flying start areas)
- Privacy
- Noise
- Livestock
- Devaluation in properties
- Rise in car insurance
- Dual carriageway
- Green wedgebelt
- Crime figures from police

Pylon
There is a Pylon that sits directly in the proposed site. In the LOP’s plan Objective 9, (1.36) ‘To provide an environment that is safe and encourages healthy lifestyle choices’, this would directly go against this objective as this isn’t a healthy lifestyle choice. Part of the original 220 site survey quoted that this site was unsuitable due to there being “Pylons on site and unsuitable access”; this hasn’t changed and remains a major issue. This is one of the main reasons the travellers themselves do not want to occupy this site.

Location
The proposed site sits neighbouring the entrance to Llanwern village, these residents have desired a rather rural life living down a narrow road, producing a country feel. This transit traveller site would not only be metres away from their front door but would defeat the object of their desired quality of life. Also, larger conflict would arise as the traveller site sits neighbouring the Ringland estate, an immeasurable amount of residents have already expressed their unhappiness with the site being on the doorstep to an already overpopulated deprived area. Newport City Councils corporate objective labelled (1.16) in the plan states ‘The LDP will help deliver developments where people want to live’. The Gypsies have already explicitly explained how they are not happy with the proposed site or its location. As both parties (Residents and Gypsies) are not happy with this site the LDP is not delivering on its corporate objective ‘Caring City’. As the location of the site sits on the curb side of the busy dual carriageway, drivers would be able to see the entire site whilst driving past. The site also sits on a slant and is not suitable to hold caravans.

Access
Access to the proposed site would be shared with the proposed 1100 houses of Gallagher development which would increase traffic many folds on a country lane. The turning in and out of the site by vehicles would be problematic given the location of the land and the fact that the road turns directly off from the 50mph limit dual carriageway.

Existing Use (Allotment act 1925)
The allotment site is still a Statutory Allotment site and is not surplus to the requirement of the residents, the 1925 Allotment act is in place. Many residents have expressed how they are on and know of people that are on the waiting list for an allotment at the proposed site, and many have expressed how they would want an allotment here as it is within walking distance from their homes.

Environment
Council guidelines dictate that when selecting sites priority should be given to Brown Field. The proposed site is an undeveloped green field site which is outside current development boundaries and currently provides a green wedge. It is important for this land to stay in its wild agricultural setting as there is little of it left within the surrounding area. The green land it improves the air quality for neighbouring Ringland and Llanwern village. The unique character of this land compliments the rural lifestyle that the residents of the border of Llanwern village have chosen to live across from the neighbouring estates. This Green Belt Wedge land giving off clearer air gives vital walking and cycling areas as well as a natural environment for plants and animals.

Underpass / Subway
The proposed site sits next to an underpass which leads into the neighbouring estate. This underpass has constantly been a prime target of anti-social behaviour. The underpass has had to have bars
and gates installed which get locked at certain times to try to fight this level of anti-social behaviour; however it is still an ongoing problem. Putting the Gypsy Site close to the underpass and choosing to see the underpass as a positive within the site is absurd. This underpass would undoubtedly incur increased levels of anti-social behaviour if the traveller site went ahead. It would also create conflict within the neighbouring residents that live so close to the underpass. I know of another site where anti-social behaviour at an underpass close to the proposed site got the site taken off the list. The Ringland underpass should be seen the same as a problem not a positive. Overpopulated I Deprived area The Ringland and Alway estates are already overpopulated; enforcing this transit traveller site onto the see states would put even more immense pressure onto an already suffocated area. These areas are seen by the Welsh Assembly as 'some of the most deprived areas in Wales', and come under the Flying Start programme to help with this underprivileged issue. Broadmead which would become another neighbouring estate to the proposed site is also coming into the Welsh Assembly's list of deprived areas. Enforcing the site next to these areas would be poor planning and a foolish decision which would affect future improvement of these neighbourhoods. The Spytty Retail Park is seeing customers from further afar now its expanding, these visitors travelling from the motorway would have to drive past the traveller site to get to the Retail Park which would undoubtedly put many off and once again turn around the progress of a thriving shopping outlet. Privacy Due to the curb side location of the site on the extremely busy dual carriageway and entrance to the Llanwem village, privacy issues would undoubtedly be a problem for the travellers. Noise Due to the close proximity to the Neighbouring residents, the noise level will undoubtedly be an issue. The area at the moment works fine with everyone living alongside one another positively. The injection of this site would upset everyone in the surrounding area. The fact the site is based curb side of the busy dual carriageway would mean the travellers would incur constant noise issues from the 50 mph road. Livestock Travelling Gypsys are well known to keep livestock close by. This would certainly be a problem at the proposed site. Not only could the animals venture onto the busy dual carriageway and cause fatalities for animals and drivers but they could also venture onto neighbouring estates causing harsh conflicts between residents and gypsies. Devaluation in properties Due to the typical stereotype of a traveller in the modern day the properties surrounding the largest site in Europe would force house prices to significantly drop. Placing a transit site next to any home will devalue any property; as buyers always look at the surrounding area. Even though this point may seem unfair it is very real and very realistic. To stop this happening to any home the proposed site should be somewhere slightly secluded and sub rural to prevent this unfair devaluation happening to people that have worked hard to buy their homes, because of stereotype. Rise in car insurance As a 20 year old girl with a first time car, I as well as many others already struggle with hefty insurance premiums. Due to the typical stereotype of a group of gypsy travellers that may not seem a fair judgement but is a proven stereotypical in most eyes, car insurance premiums would rise due to increase risks in theft of a vehicle, damage, etc. Having the Gypsy Site next door to an already overpopulated area this would affect thousands with their car insurance bills. Dual carriageway The proposed site sits curb side to the busy dual carriageway, which in recent time has become even busier due to the growth in the up and coming Spytty Retail Park. The dual carriageway links from the motorway and leads to the Retail Park, which becomes extremely busy at weekends when shoppers head to the shopping outlet, as well as the main city centre. This pressure on the road has increased its fair share of fatalities in the past (even before it became a large dual carriageway) now the road is double the width fatality risks have increased, and this would be poor planning to locate the gypsy site so close to a dual carriageway road. In the LDP's plan listed (1.16) 'Careful planning and design' this would be poor planning by the NCC. (1.20) 'The LDP will aim to create developments where people feel safe and secure'; this would be a huge safety failure. The site also sits in the bend of the dual carriageway and so as cars come around the bend car lights would shine straight through the proposed site which would also cause problems for the travellers. Green wedge green belt The proposed land is of green belt/wedge and is undeveloped and full of wildlife complimenting the surrounding urban area. It is important for this land to stay in its wild agricultural setting as there is little of it left within the surrounding area. The green land improvement for neighbouring Rinishank and Llanwem village as well as the Schools. The unique character of this land surrounded by hedges compliments the rural lifestyle that the residents of Llanwem village have chosen to live across from the neighbouring estates. This Green Belt/Wedge land giving off clearer air gives vital walking areas as well as a natural environment for plants and animals. Crime figures from police The Ringland/Alway areas surrounding the proposed site all have high crime percentage figures. These areas are well known to Newport police and frequent visits are made and logged. Ringland and Alway have already extremely high crime figures thus not being a suitable place to plant a Gypsy traveller site. Putting the gypsy traveller site in the proposed location would not only cause more conflict within an already 'hard to control area' but would more than likely see new confrontations and conflicts arise thus increasing the already soaring crime rate. Again the Gypsy Traveller site would be more suited to a rural sub rural area. All of the above are reasons I believe Ringland Allotments is not a suitable site to house the transit Gypsy Travellers. I believe it’s in the interest of both parties that the site does not go ahead. A more suitable site should be re-considered. from the faults I have found at Ringland.
Allotments I believe the Gypsy site would be best suited to a more rural or sub-rural area, as the travellers have requested. Please note that whilst individuals have submitted their response in order to meet the deadline enforced by Newport City Council. Many residents are not happy with the way this process has been conducted and believe that Newport City Council have laid low when giving information and informing local residents of the mammoth proposed site.

Thank you, I look forward to your response.
Hartridge Farm Road:

Size and Layout – It is acknowledged that the size of the Hartridge Farm Road site is larger than Welsh Government guidance suggests, however this will avoid the need to split any of the individual families, which is an important factor for the families themselves. The size is sufficient to accommodate all 3 families, which would meet Newport’s residential need for Gypsy/Traveller provision. The proposed layout would use screening to effectively create 3 independent sites within the curtilage of the whole site. The site would also be screened from the road and nearby residential properties.

Location – The site is within the settlement boundary and considered to be a sustainable location. Remote locations outside of the settlement boundary have poorer access to amenities and place more of an emphasis on car travel, therefore deemed to be more unsustainable. Site design can ensure it is well screened from the nearby RSPCA Centre and Llanwern High School.

Current Use – The Road Safety Centre at the site would need to be relocated. The Council will assist with the relocation as best it can. This would be the case for any proposed use of the site.

Proximity to Sewage Pumping Station – No concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

Access – It is acknowledged that the Hartridge Farm Road site will require improvements to the access road including the provision of a length of pavement. This will be agreed as part of a planning application and is not considered insurmountable.

Llanwern High School – The site will be well screened and should not impact on Llanwern High School. Perception of Gypsy/Travellers at the School is something that the Council will need to address through interaction with the Head Teacher and Governors.

Ysgol Gymraeg Casnewydd - The site will be well screened and should not impact on Ysgol Gymraeg Casnewydd. Perception of Gypsy/Travellers at the School is something that the Council will need to address through interaction with the Head Teacher and Governors.

Financial Matters – The Council is aware of the financial implications to its budget.

RSPCA Centre – The draft indicative layout of this site shows that a significant buffer could be provided between the RSPCA Centre and the pitches.

Land Presentation – Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development. Ground re-profiling works will be required at Hartridge Farm Road and the work will add to the development costs, but is not considered insurmountable.

Amenities – It is agreed that the locking of the underpass is something that needs to be avoided in order to ensure access to local amenities. The site is also within a short walk from Newport Retail Park.

Noise – A noise assessment has been undertaken for Hartridge Farm Road. It is proposed that a 1.8m high noise attenuation fence is constructed adjacent to the RSPCA Centre, alongside the mainline railway and between the SDR and north-eastern part of the site.

Potential danger caused by animals – The Council has a duty to provide accommodation for the gypsy/traveller population. We do not have a duty to provide land for horses. The site will be owned and managed by the Council and there is no intention to allow the occupants to keep horses on site.

Aspect – A noise attenuation fence will be constructed alongside the mainline railway and the area will be well screened.

The Process – The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.

Flooding – There are no flood risk issues at Hartridge Farm Road providing a buffer is left at the southern edge of the site adjacent to the railway.
Crime/Perception of Crime – As with any other significant development, the Council has liaised with the police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the police if any incidents of crime that relate to the site are reported.

Alternative Sites – Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

Regional/Cross boundary issues - As part of the Fordham Assessment research, interviews were conducted with neighbouring residents in order to discuss and establish the impact of cross-boundary movements. The outcomes were factored into the conclusions and recommendations of the report.

The Council must provide sites to meet the need identified for families within its area that require accommodation. Sites should be allocated within the relevant Authority's area, not in a neighbouring Authority, in the same way as each Authority is required to meet its bricks and mortar housing needs within its own LDP.

There have been informal discussions with South East Wales Authorities about establishing a regional network of transit sites, however there is clear evidence that a transit site is needed within Newport. There is no report yet produced.

House Prices – The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.

Ringland Allotments:

Health Issues and Pylons - No concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

Location - The site is adjacent to the settlement boundary and considered to be a reasonably sustainable location. More remote locations that are further outside of the settlement boundary have poorer access to amenities and place more of an emphasis on car travel, therefore deemed to be more unsustainable.

Land Presentation – Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development. The results of these surveys have confirmed that some ground re-profiling works will be required at the Former Ringland Allotments. This work will add to the development costs but is not considered to be insurmountable.

Access – Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

Existing Use – There are no allotments on the site. Alternative allotment provision can be investigated if it is demonstrated there is insufficient allotment provision across Newport as a whole.

Aspect – A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

Highway Safety - Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

Environmental – The Council Strategy is a Brownfield led strategy and preference is given to sites which are previously developed. A number of greenfield sites are within the Plan as they are considered appropriate and well located for development. This is why this site is included.

Amenities - It is agreed that the locking of the underpass is something that needs to be avoided in order to ensure access to local amenities.

Flooding – Flood risk at this site is not considered to be a significant risk.

Financial Implications – The Council is aware of the potential financial implications of going ahead with the site. Gallagher Estates have planning permission for their major development in close proximity to the site and although they have submitted representations of concern, they are currently continuing to submit information to enable them to discharge planning conditions and get on site and build.
Privacy and Noise - A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

Potential danger caused by animals - The Council has a duty to provide accommodation for the Gypsy/Traveller population. We do not have a duty to provide land for horses. The site will be owned by the Council and there is no intention to allow the occupants to keep horses on site.

The Process – The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.

Crime/Perception of Crime – As with any other significant development, the Council has liaised with the police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the police if any incidents of crime that relate to the site are reported.

Alternative Sites – Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

House Prices – The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.
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Document: Revised LDP, p. 76
Policy: H16.01
Map: Proposals East: Proposals Plan - East
Summary: Object to Gypsy and Traveller allocations at the Former Ringland Allotments and Hartridge Farm Road
I am a 20 year old girl living in Ringland and am unhappy with the LDP revised deposit plan June 2013. I am unhappy with the proposed gypsy traveller sites positioned on Hartridge Farm Road and former Ringland Allotments, and feel strongly that these sites are unsuitable for both parties (gypsy community and neighbouring residential community). I feel the proposed sites go against what the overall LDP is trying to achieve. Although I fully support the need for the Gypsy and Traveller Sites within the City, I feel these two sites have been selected against the criteria provided by the Welsh Government guidance as set out in WAG Circular 30/2007.

Ringland Allotments
- Pylon
- Location
- Access
- Existing Use (Allotment act 1925)
- Environment
- Underpass / Subway
- Overpopulated / Deprived area (Welsh Government Flying start areas)
- Privacy
- Noise
- Livestock
- Devaluation in properties
- Rise in car insurance
- Dual carriageway
- Green wedgebelt
- Crime figures from police

Pylon
There is a Pylon that sits directly in the proposed site. In the LDP’s plan Objective 9, (1.36): ‘To provide an environment that is safe and encourages healthy lifestyle choices’, this would directly go against this objective as this isn’t a healthy lifestyle choice. Part of the original 220 site survey quoted that this site was unsuitable due to there being “Pylons on site and unsuitable access”; this hasn’t changed and remains a major issue. This is one of the main reasons the travellers themselves do not want to occupy this site.

Location
The proposed site sits neighbouring the entrance to Llanwern village, these residents have desired a rather rural life living down a narrow road, producing a country feel. This transit traveller site would not only be metres away from their front door but would defeat the object of their desired quality of life. Also, larger conflict would arise as the traveller site sits adjoining the Ringland estate, an immeasurable amount of residents have already expressed their unhappiness with the site being on the doorstep to an already overpopulated deprived area. Newport City Councils corporate objective labelled (1.16) in the plan states ‘The LDP will help deliver developments where people want to live’. The Gypsies have already explicitly explained how they are not happy with the proposed site or its location. As both parties (Residents and Gypsies) are not happy with this site the LDP is not delivering on its corporate objective ‘Caring City’. As the location of the site sits on the curb side of the busy dual carriageway, drivers would be able to see the entire site whilst driving past. The site also sits on a slant and is not suitable to hold caravans.

Access
Access to the proposed site would be shared with the proposed 1100 houses of Gallagher development which would increase traffic many folds on a country lane. The turning in and out of the site by vehicles would be problematic given the location of the land and the fact that the road turns directly off from the 50mph limit dual carriageway.

Existing Use (Allotment act 1925)
The allotment site is still a Statutory Allotment site and is not surplus to the requirement of the residents, the 1925 Allotment act is in place. Many residents have expressed how they are on and know of people that are on the waiting list for an allotment at the proposed site, and many have expressed how they would want an allotment here as it is within walking distance from their homes.

Environment
Council guidelines dictate that when selecting sites priority should be given to Brown Field. The proposed site is an undeveloped green field site which is outside current development boundaries and currently provides a green wedge. It is important for this land to stay in its wild agricultural setting as there is little of it left within the surrounding area. The green land it improves the air quality for neighbouring Ringland and Llanwern village. The unique character of this land compliments the rural lifestyle that the residents of the border of Llanwern village have chosen to live across from the neighbouring estates. This Green Belt/Wedge land giving off clearer air gives vital walking and cycling areas as well as a natural environment for plants and animals.

Underpass / Subway
The proposed site sits next to an underpass which leads into the neighbouring estate. This underpass has constantly been a prime target of anti-social behaviour. The underpass has had to have bars...
and gates installed which get locked at certain times to try to fight this level of anti-social behaviour; however it is still an ongoing problem. Putting the Gypsy Site close to the underpass and choosing to see the underpass as a positive within the site is absurd. This underpass would undoubtedly incur increased levels of anti-social behaviour if the traveller site went ahead. It would also create conflict within the neighbouring residents that live so close to the underpass. I know of another site where anti-social behaviour at an underpass close to the proposed site got the site taken off the list. The Ringland underpass should be seen the same as a problem not a positive.

Overpopulated Deprived area

The Ringland and Alway estates are already overpopulated; enforcing this transit traveller site onto these estates would put even more immense pressure onto an already suffocated area. These areas are also seen by the Welsh Assembly as ‘some of the most deprived areas in Wales’, and come under the Flying Start programme to help with this underprivileged issue. Broadmead which would become another neighbouring estate to the proposed site is also coming into the Welsh Assembly’s list of deprived areas. Enforcing the site next to these areas would be poor planning and a foolish decision which would affect future improvements of these neighbourhoods. The Spytty Retail Park is seeing customers from further afield now its expanding, these visitors travelling from the motorway would have to drive past the traveller site to get to the Retail Park which would undoubtedly put many off and once again turn around the progress of a thriving shopping outlet.

Privacy

Due to the curb side location of the site on the extremely busy dual carriageway and entrance to the Llanwem village, privacy issues would undoubtedly be a problem for the travellers. Due to the close proximity to the Neighbouring residents, the noise level will undoubtedly be an issue. The area at the moment works fine with everyone living alongside one another positively. The injection of this site would upset everyone in the surrounding area. The fact the site is based curb side of the busy dual carriageway would mean the travellers would incur constant noise issues from the 50 mph road.

Livestock

Travelling Gypsies are well known to keep livestock close by. This would certainly be a problem at the proposed site. Not only could the animals venture onto the busy dual carriageway and cause fatalities for animals and drivers but they could also venture onto neighbouring estates causing harsh conflicts between residents and gypsies.

Devaluation in properties

Due to the typical stereotype of a traveller in the modern day the properties surrounding the largest site in Europe would force house prices to significantly drop. Placing a transit site next to any home will devalue any property; as buyers always look at the surrounding area. Even though this point may seem unfair it is very real and very realistic. To stop this happening to any home the proposed site should be somewhere slightly secluded and sub rural to prevent this unfair devaluation happening to people that have worked hard to buy their homes, because of stereo types.

Rise in car insurance

As a 20 year old girl with a first time car, I as well as many others already struggle with hefty insurance premiums. Due to the typical stereotype of a group of gypsy travellers that may not seem a fair judgement but is a proven stereotypical in most eyes, car insurance premiums would rise due to increased risks in theft of a vehicle, damage, etc. Having the Gypsy Site next door to an already overpopulated area this would affect thousands with their car insurance bills.

Dual carriageway

The proposed site sits curb side to the busy dual carriageway, which in recent time has become even busier due to the growth in the up and coming Spytty Retail Park. The dual carriageway links from the motorway and leads to the Retail Park, which becomes extremely busy at weekends when shoppers head to the shopping outlet, as well as the main city centre. This pressure on the road has had its fair share of fatalities in the past (even before it became a large dual carriageway) now the road is double the width fatality risks have increased, and this would be poor planning to locate the gypsy site so close to a dual carriageway road. In the LDP’s plan listed (1.16) ‘Careful planning and design’ this would be poor planning by the NCC. (1.20) ‘The LDP will aim to create developments where people feel safe and secure’; this would be a huge safety failure. The site also sits in the bend of the dual carriageway and so as cars come around the bend car lights would shine straight through the proposed site which would also cause problems for the travellers.

Green wedge/Green belt

The proposed land is of green belt/wedge and is undeveloped and full of wildlife complimenting the surrounding urban area. It is important for this land to stay in its wild agricultural setting as there is little of it left within the surrounding area. The green land improve the air quality for neighbouring Ringland and Llanwem village as well as the Schools. The unique character of this land surrounded by hedges compliments the rural lifestyle that the residents of Llanwem village have chosen to live across from the neighbouring estates. This Green Belt/Wedge land giving off clearer air gives vital walking areas as well as a natural environment for plants and animals.

Crime figures from police

The Ringland/Alway areas surrounding the proposed site all have high crime percentage figures. These areas are well known to Newport police and frequent visits are made and logged. Ringland and Always have already extremely high crime figures thus not being a suitable place to put a Gypsy traveller site. Putting the gypsy traveller site in the proposed location would not only cause more conflict within an already ‘hard to control area’ but would more than likely see new confrontations and conflicts arise thus increasing the already soaring crime rate. Again the Gypsy Traveller site would be more suited to a rural sub rural area.

All of the above are reasons I believe Ringland Allotments is not a suitable site to house the transit Gypsy Travellers. I believe it’s in the interest of both parties that the site does not go ahead. A more suitable site should be re-considered. From the flaws I have found at Ringland.
Allotments I believe the Gypsy site would be best suited to a more rural or sub-rural area, as the travellers have requested.

Please note that whilst individuals have submitted their response in order to meet the deadline enforced by Newport City Council. Many residents are not happy with the way this process has been conducted and believe that Newport City Council have laid low when giving information and informing local residents of the mammoth proposed site.

Thank you, I look forward to your response.

Comments relating to the Former Ringland Allotment Site are addressed under 3886.L1.

It is acknowledged that the size of the Hartridge Farm Road site is larger than Welsh Government guidance suggests, however this will avoid the need to split any of the individual families, which is an important factor for the families themselves. The site, which would contain fewer pitches than Shirenewton in Cardiff, would not be the largest in the United Kingdom, let alone Europe. The size is sufficient to accommodate all 3 families, which would meet Newport’s residential need for Gypsy/Traveller provision. The proposed layout would use screening to effectively create 3 independent sites within the curtilage of the whole site. The site would also be screened from the road and nearby residential properties.

The Hartridge Farm Road site is next to a Site of Importance for Nature Conservation, however this is not considered to make the site undevelopable. Relevant consultations will take place as part of the planning application submission process and any necessary mitigation measures agreed.

The site will be well screened and should not impact on Llanwern High School and Ysgol Gymraeg Casnewydd. Perception of Gypsy/Travellers at the Schools is something that the Council will need to address through interaction with the Head Teacher and Governors.

The draft indicative layout of this site shows that a significant buffer could be provided between the RSPCA Centre and the pitches.

A Strategic Flood Consequence Assessment (SFCA) has been undertaken on the proposals in the Plan. This looks at a range of flooding scenarios including tidal and fluvial as well as surface water run-off. There are no flood risk issues at Hartridge Farm Road providing a buffer is left at the southern edge of the site adjacent to the railway. More detailed assessments will be required as part of planning applications submissions.

As with any other significant development, the Council has liaised with the Police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the Police if any incidents of crime that relate to the site are reported.

The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.

A noise attenuation fence will be constructed alongside the mainline railway and the area will be well screened.

With regards to proximity to Sewage Pumping Station, no concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

The Road Safety Centre at the site would need to be relocated. The Council will assist with the relocation as best it can. This would be the case for any proposed use of the site.

It is acknowledged that the Hartridge Farm Road site will require improvements to the access road including the provision of a length of pavement. This will be agreed as part of a planning application and is not considered insurmountable.

The site is not designated as a Green Wedge or Green Belt. Prior to the gypsy and traveller allocation the site was allocated as a residential development site for 290 houses.
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Document: Revised LDP, p. 76

Policy: H16.01

Map: Proposals East: Proposals Plan - East

Summary: Object to Gypsy and Traveller site allocation in the LDP.

Additional material submitted - Please click here.
I am a 70 year old lady living at Royal Oak Drive. I am not happy with the proposed sites, Ringland Allotments and Hartridge farm road becoming Gypsy Traveller sites. After looking over the NCC’s LDP plan there are a catalogue of things I am unhappy with. Objection against the Hartridge Farm road site

1. Wildlife
2. Neighbouring schools
3. RSPCA
4. Dual Carriageway
5. Crime figures
6. Railway Line
7. Wildlife

The huge land that is Hartridge Farm road proposed site is already occupied by a variety of different species within a natural unique habitat. I would be outraged if the NCC built upon this untouched land as oppose to building on an already developed land. In the LDP plan it states how sites that have already been built on and previously developed should be built on. It also states how ‘developers must consider the effects of any proposals on legally protected species’ and ‘Newport City Council has a duty under the Natural Environment and Rural Communities act’. They also must abide by the European Protected Species Act, Wildlife and Countryside Act 1981 and Protection of Badgers Act 1992. I do not believe due to the scale of Wildlife this area houses, that this land should be built on as these acts would undoubtedly be breached.

This green space is important as the gateway to Newport and should be kept to help the neighbouring estate with cleaner air as it has little green areas.

2. Neighbouring Schools
A fantastic new state of the art School (Llanwern High) has just been built and the attitude of the students has transformed dramatically. The students feel comfortable and safe in their new school, as well as the Ysgol Gymraeg Welsh Primary School thriving with their students. It would be criminal to plant the largest Gypsy Site in Europe upon these children. Many parents of Rinland and Alway have strongly expressed how they would take their children out of these schools if this site was to go ahead. These children should not suffer to poor planning by the LDP, the site should not be so close to a mainstream school. The Gypsy travellers have already expressed how conflicts could arise being so close to a school.

3. RSPCA
The proposed site sits next door to the RSPCA which causes a huge hazard as these animals are already distressed and in need of quiet secluded space. The close proximity would cause noise levels to aggravate vulnerable animals as well as working staff. Staff walk the animals daily out of their own choice, and have expressed how they would not feel comfortable walking the animals if the site went ahead, therefore the animals losing out Visitors of the RSPCA would also not feel comfortable travelling there, as they have to pass a mammoth gypsy traveller site as well as pass the entrance.

4. Dual carriageway
The proposed land sits mere meters away from the busy dual carriageway. This scares me as this road has had plenty of accidents in the past, with some being fatal. It now links the motor way with the up and coming Retail park and links into town over the new bridge and beyond. This has made this road extremely busy which makes this land unsuitable for residents. Not only could people or children venture onto this road but the livestock and animals belonging to the gypsies could also unknowingly travel onto the road and cause a fatal accident. Having to drive past a traveller site would also upset a lot of frequent users of the road, as well as the noise level annoying the travellers from constant cars travelling 50 mph past their thin caravans. The access from the land would be straight onto the 50 mph road causing another hazard.

5. Crime figures
The Ringland estate has a very high crime percentage and is well known to Newport police as one of the highest crime rating estates in Newport. To put a transit gypsy site on the door step of this estate and expect them to enter this already overpopulated deprived area would be absurd! The area is already uncontrollable and Newport City police try hard to maintain the level of violence within the area, by putting the traveller site in the location proposed would put an even larger strain on the police and conflicts between residents and travellers are guaranteed, as many Ringland residents have already expressed.

6. Railway Line
There is an exposed railway line that borders the proposed site. This railway line first and foremost is a major hazard as accidents can happen on the track, with busy trains travelling frequently. Many gypsies are known to keep live stock near to them, this could also cause accidents if an animal was to venture onto the Railway line, the outcome could be fatal for passengers on the train. In the past the Railway line has been stripped of materials to cash in and could be of interest to travellers, which would then cost to repair the Railway line once again. The close proximity to the proposed site would mean the noise issue of frequently passing trains would be continuous for the travellers. In the LDP plan it states how its vision is that ‘Newport is the gateway to Wales’, as this Railway line sits on the border of Newport and brings visitors in and out the proposed site is not portraying a positive image of Newport. Thank you for reading my objection letter against the Hartridge Farm road site becoming a gypsy site. All of the above are reasons I believe the site is absolutely unsuitable for the requirements of the Gypsies, as well as not suitable for the local residents. I believe the transit site...
should be located at a rural safe site where everyone feels safe and the land is suitable.

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**Item Question**  Council Responses

13 13  Council Response

The Hartridge Farm Road site is next to a Site of Importance for Nature Conservation, however this is not considered to make the site undevelopable. Relevant consultations will take place as part of the planning application submission process and any necessary mitigation measures agreed.

The site will be well screened and should not impact on Llanwern High School or Ysgol Gymraeg Casnewydd. Perception of Gypsy/Travellers at the Schools is something that the Council will need to address through interaction with the Head Teacher and Governors.

A noise assessment has been undertaken for Hartridge Farm Road. It is proposed that a 1.8m high noise attenuation fence is constructed adjacent to the RSPCA Centre, alongside the mainline railway and between the SDR and north-eastern part of the site.

The Council has a duty to provide accommodation for the gypsy/traveller population. We do not have a duty to provide land for horses. The site will be owned and managed by the Council and there is no intention to allow the occupants to keep horses on site.
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**Document:** Revised LDP, p.76

**Policy:** H16.02

**Map:** Proposals East: Proposals Plan - East

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Objection against the Ringland Allotments site
1. Pylon
2. Dual carriageway
3. Underpass
4. Crime figures
5. Allotments

1. Pylon

A pylon is located in the centre of the proposed site at the Ringland allotments. In the LDP document it is said how they wish ‘to provide an environment that is safe and encourages healthy lifestyle choices’. This would openly go against this statement as pylons are known to have health implications, as shown below [see hyperlink]. Not only would health implications be a huge issue but the safety within the Pylon would be another enormous hazard. I am also aware that part of the 220 site survey identified this site unsuitable, which is a correct statement, it is unsuitable.

2. Dual carriageway

The proposed land sites mere meters away from the busy dual carriageway. This scares me as this road has had plenty of accidents in the past, with some being fatal. It now links the motor way with the up and coming Retail park and links into town over the new bridge and beyond. This has made this road extremely busy which makes this land unsuitable for residents. Not only could people or children venture onto this road but the livestock and animals belonging to the gypsies could also unknowingly travel onto the road and cause a fatal accident. The Dual carriageway also bends at this part of the site meaning that car lights would shine straight through the camp site into the traveller caravans which would undoubtedly be a problem for them. Having to drive past a traveller site would also upset a lot of frequent users of the road, as well as the noise level annoying the travellers from constant cars travelling 50 mph past their thin caravans. The access from the land would be straight onto the 50 mph road causing another hazard.

3. Underpass

The site sits next to an underpass, I am extremely angry to learn that this underpass may be seen as a positive, linking the travellers to the neighbouring Ringland estate. Firstly, I know of another proposed site that also featured an underpass, but this underpass for some reason was seen as a negative ‘anti-social’ problem and so I question why the underpass at ringland allotments is seen as a positive. This underpass has had problems with antisocial behaviour for years. There has been gates installed that get locked at certain times to try fight the severe level of antisocial behaviour but it is still an ongoing problem. If the traveller site was to go to the Ringland allotments the antisocial behaviour would only worsen and new conflicts between residents in ringland that live close the the underpass and travellers would arise.

4. Crime figures

The Ringland estate has a very high crime percentage and is well known to Newport police as one of the highest crime rating estates in Newport. To put a transit gypsy site on the door step of this estate and expect them to enter this already overpopulated deprived area would be absurd! The areas is already uncontrollable and Newport City police try hard to maintain the level of violence within the area, by putting the traveller site in the location proposed would put an even larger strain on the police and conflicts between residents and travellers are guaranteed, as many Ringland residents have already expressed.

5. Allotments

The allotment act 1925 is still in place for this proposed site, and I know of many individuals that are on the waiting list for an allotment on this land. Please tell me why they have not been awarded an allotment as they have requested, and the land is now being questioned about becoming a transit site for travelling gypsies? I myself being a widowed pensioner have felt the strain of food prices going up and I desire a greener way of life. I myself would seek one of these allotments; it is within walking distance of my home and would keep me more sociable with other allotment users.
Thank you for reading my objection letter against the Ringland Allotments becoming a transit gypsy site. All of the above are reasons I believe the site is absolutely unsuitable for the requirement of the Gypsies, as well as not suitable for the local residents. I believe the transit site should be located at a rural safe site where everyone feels safe and the land is suitable.
Hartridge Farm Road:

Size and Layout – It is acknowledged that the size of the Hartridge Farm Road site is larger than Welsh Government guidance suggests, however this will avoid the need to split any of the individual families, which is an important factor for the families themselves. The size is sufficient to accommodate all 3 families, which would meet Newport’s residential need for Gypsy/Traveller provision. The proposed layout would use screening to effectively create 3 independent sites within the curtilage of the whole site. The site would also be screened from the road and nearby residential properties.

Location – The site is within the settlement boundary and considered to be a sustainable location. Remote locations outside of the settlement boundary have poorer access to amenities and place more of an emphasis on car travel, therefore deemed to be more unsustainable. Site design can ensure it is well screened from the nearby RSPCA Centre and Llanwern High School.

Current Use – The Road Safety Centre at the site would need to be relocated. The Council will assist with the relocation as best it can. This would be the case for any proposed use of the site.

Proximity to Sewage Pumping Station – No concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

Access – It is acknowledged that the Hartridge Farm Road site will require improvements to the access road including the provision of a length of pavement. This will be agreed as part of a planning application and is not considered insurmountable.

Llanwern High School – The site will be well screened and should not impact on Llanwern High School. Perception of Gypsy/Travellers at the School is something that the Council will need to address through interaction with the Head Teacher and Governors.

Ysgol Gymraeg Casnewydd - The site will be well screened and should not impact on Ysgol Gymraeg Casnewydd. Perception of Gypsy/Travellers at the School is something that the Council will need to address through interaction with the Head Teacher and Governors.

Financial Matters – The Council is aware of the financial implications to its budget.

RSPCA Centre – The draft indicative layout of this site shows that a significant buffer could be provided between the RSPCA Centre and the pitches.

Land Presentation – Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development. Ground re-profiling works will be required at Hartridge Farm Road and the work will add to the development costs, but is not considered insurmountable.

Amenities – It is agreed that the locking of the underpass is something that needs to be avoided in order to ensure access to local amenities. The site is also within a short walk from Newport Retail Park.

Noise – A noise assessment has been undertaken for Hartridge Farm Road. It is proposed that a 1.8m high noise attenuation fence is constructed adjacent to the RSPCA Centre, alongside the mainline railway and between the SDR and north-eastern part of the site.

Potential danger caused by animals – The Council has a duty to provide accommodation for the gypsy/traveller population. We do not have a duty to provide land for horses. The site will be owned and managed by the Council and there is no intention to allow the occupants to keep horses on site.

Aspect – A noise attenuation fence will be constructed alongside the mainline railway and the area will be well screened.

The Process – The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.

Flooding – There are no flood risk issues at Hartridge Farm Road providing a buffer is left at the southern edge of the site adjacent to the railway.
Crime/Perception of Crime – As with any other significant development, the Council has liaised with the police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the police if any incidents of crime that relate to the site are reported.

Alternative Sites – Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

Regional/Cross boundary issues - As part of the Fordham Assessment research, interviews were conducted with neighbouring residents in order to discuss and establish the impact of cross-boundary movements. The outcomes were factored into the conclusions and recommendations of the report.

The Council must provide sites to meet the need identified for families within its area that require accommodation. Sites should be allocated within the relevant Authority's area, not in a neighbouring Authority, in the same way as each Authority is required to meet its bricks and mortar housing needs within its own LDP.

There have been informal discussions with South East Wales Authorities about establishing a regional network of transit sites, however there is clear evidence that a transit site is needed within Newport. There is no report yet produced.

House Prices – The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.

Ringland Allotments:

Health Issues and Pylons - No concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

Location - The site is adjacent to the settlement boundary and considered to be a reasonably sustainable location. More remote locations that are further outside of the settlement boundary have poorer access to amenities and place more of an emphasis on car travel, therefore deemed to be more unsustainable.

Land Presentation – Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development. The results of these surveys have confirmed that some ground re-profiling works will be required at the Former Ringland Allotments. This work will add to the development costs but is not considered to be insurmountable.

Access – Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

Existing Use – There are no allotments on the site. Alternative allotment provision can be investigated if it is demonstrated there is insufficient allotment provision across Newport as a whole.

Aspect – A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

Highway Safety - Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

Environmental – The Council Strategy is a Brownfield led strategy and preference is given to sites which are previously developed. A number of greenfield sites are within the Plan as they are considered appropriate and well located for development. This is why this site is included.

Amenities - It is agreed that the locking of the underpass is something that needs to be avoided in order to ensure access to local amenities.

Flooding – Flood risk at this site is not considered to be a significant risk.

Financial Implications – The Council is aware of the potential financial implications of going ahead with the site. Gallagher Estates have planning permission for their major development in close proximity to the site and although they have submitted representations of concern, they are currently continuing to submit information to enable them to discharge planning conditions and get on site and build.
Privacy and Noise - A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

Potential danger caused by animals - The Council has a duty to provide accommodation for the Gypsy/Traveller population. We do not have a duty to provide land for horses. The site will be owned by the Council and there is no intention to allow the occupants to keep horses on site.

The Process – The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.

Crime/Perception of Crime – As with any other significant development, the Council has liaised with the police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the police if any incidents of crime that relate to the site are reported.

Alternative Sites – Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

House Prices – The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.

Edmunds, Mr J L

I wish to record with you my objection to the proposed siting of the Gypsy traveler camp at the so called Ringland Allotments. this has been an allotment for several years and although I would liked to have one of them I chose not on to because of two reasons.

1) there are reports that overhead powerlines are harmful to to ones health.
2) it is well known that exhaust fumes are also harmful and test have shown that plants adjacent to roads do pick up the residue of lead and other elements from the fumes blown over them.

As a diabetic I have enough problems with my health so try to avoid any further risks and would not put myself or my children at risk should they want to accompany me there as I know they would. More recently research has shown that children living close to traffic have higher instance of asthma than those who don't. Would you put your children at such risk as you would those of gypsy travelers. The site is also so close to the SDR that a camp there would be subject to considerable noise levels and other potential health hazard. Access is off a narrow lane which is beyond a bend from the village of Llanwern and would present considerable difficulty when the traffic movement onto or off the site was in operation due to the aspect of the land.

I think whoever decided that this site was suitable cares little for the health, Well being and safety of the families you would force on to this site, or the safety of all using the roads in the area.

Health Issues and Pylons - No concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.
Representation

I am quite dismayed that the above plan includes the utilization of land adjacent the Llanwern High School Campus for a Gypsy/Traveler site. This land was earmarked for housing development and was to be sold for that purpose to offset the large cost of the new school built in part with borrowed money.

To manage the finance of the city must be the prime responsibility of every councilor individually and collectively and not to do so smack of irresponsible management, which poses the questions:

1. Are our city managers sufficiently capable of ruling this city on our behalf?
2. Are they worthy of the task?
3. Are they frugal enough?
4. Are they astute enough?

To waste this real opportunity to realize the value from the sale of this land is not good management and shows they:

1. Are not sufficiently capable!
2. Are not worthy of the task!
3. Are not frugal enough!
4. Are not astute enough!

I can not support a plan that has been produced with scant regard for the financial benefit of the city which screams of such blatant mismanagement and therefore wish to register my objection to the surrender of this plot of land for the purpose of a Gypsy/Traveler site for free.

Council Responses

The Council has a duty to identify the need within its area for gypsy and traveller sites, and then take steps to address that need. The LDP must provide sufficient land to meet the identified need and is aware of the financial implications to its budget in doing so.

No concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.
Representation Details

Document: Revised LDP, p. 76
Policy: H16.02
Summary: Objection to Gypsy and Traveller site allocations in the LDP

Item Question  Representation Text

11 11  Representation
Re: Revised Deposit Local Development Plan 2011–2026
Ringland Allotments Gypsy/Traveler site

Dear Sir/Madam,

I wish to register objection to the proposed siting of the Gypsy traveler camp at the Ringland Allotments. I have lived here for 26 years and it is well known that we have experienced anti-social behavior on and off in the underpass virtually next to my home. I am sure that this will increase if the allotments were developed as gypsy traveler site. There are many good people living close by me and in Ringland as a whole and I don't doubt the same is true about gypsy travelers but like us ordinary folk they will undoubtedly have some who can not resist the temptation particularly when at a certain age of "winding people up" thereby causing potential problems that is likely to lead to violence. When two differing cultures are place forcefully together it can only result in bad feeling that has in the past lead to ongoing disputes and high levels of anti-social behavior. Often it can be started by an error of judgment or as a result of a third party being guilty of a misdemeanor with the blame falling on others.

The site is of a sloping aspect and literally a pavements width away from the SDR a 50MPH highway. Children playing on the proposed site could cause a serious accident if say a football or any other items was to be thrown or kicked over a fence or barrier. There are pylons carrying 33k volts across the site. Magnetic fields that have been proven to be harmful to the health of children and young people. The travelers have declared that they do not want to go there because of this plus the noise and exhaust pollution carried on to the site. They care for the health and welfare of their children but you are not giving them a choice so clearly you don't!

This a bad decision. The wrong decision and the wrong place.

I strongly object and support the objections from the Ringland Matters Group.

Item Question  Council Responses

13 13  Council Response
Health Issues and Pylons - No concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

Crime/Perception of Crime – As with any other significant development, the Council has liaised with the police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the police if any incidents of crime that relate to the site are reported.
Re: Revised Deposit Local Development Plan 2011-2026
Hartridge Farm Road GypsylTravelers Site
Dear SIR/MADAM

I am an ex pupil of the old Hartridge High school and would have been happy for my daughter to go there as it was not far from where we lived. Unfortunately the reputation had been such that I opted to send her to Caerleon which was at that time been rated much better.

I now have grandchildren and with the new school having such a good reputation was hopeful that they would go there as they to live not far away. But already people myself included are looking to the future and are concerned that this new £29M project will again become a less desirable opt for parents because of its likely close proximity to a Gypsy Travelers site. My Daughter and Niece have both expressed reluctant to make it their first choice and are even considering not to have it as an option and feel that most most parents of the more able students will do the same.

If this should happen the fear is that it will again lose the current prestigious status it know has. Can anyone really picture a traveler's caravan park alongside a £29M educational establishment without wondering if the planners are really sane.

Another wrong decision by city planners who should be protecting the future wellbeing of Newport its educational and our assets, realising wherever the value of those assets not giving them away.

I strongly object and support the objections from the Ringland Matters Group about this proposal.

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Aspect – A noise attenuation fence will be constructed alongside the mainline railway and the area will be well screened.

Head of Education Services has not raised any concerns in respect of this proposed site. The site will be well screened and should not impact on Llanwern High School or Ysgol Gymraeg Casnewydd.

Perception of Gypsy/Travellers at the Schools is something that the Council will need to address through interaction with the Head Teachers and Governors.

Alternative Sites – Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
Representation Details

Rep'n/Para/Policy: 3890.L1//H15.02

Agent: French, T J

Document: Revised LDP, p.75

Policy: H15.02

Map: Proposals East: Proposals Plan - East

Summary: Object to allocation of the Former Ringland Allotments as a Gypsy and Traveller site.

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Representation

Re: Revised Deposit Local Development Plan 2011-2026

Gypsy Travelers At The Cot Hill - Ringland Allotments Site

I wish to record my objection to the proposal to put Gypsy Travelers on the site known as the Ringland Allotments. This site is on the main route into Newport that leads to the growing business area of Newport Retail Park; which is currently the main shopping centre of the City. I guess it was the planners intention to be up front and honest with would be potential businesses who maybe considering to locate there to show them that they would have as near neighbors a traveling community of Gypsies. Travelers some of whom may well be permanently sited there. It is not the people who would occupy the site that I am concern about but the Image of a camp site on a main route into the City. During the many years I have lived in Newport - all of my life - I have met some of the travelers. In fact one of my very good friends was married to a gypsy until she died last year and lived not far away. It was she who once told me that gypsies would not wash the top half of their bodies in the same water that they had washed the bottom half in. That belayed the lie that some believed when I was a child that gypsies were dirty. She was a lovely Lady full of friendship and compassion and I know if she was alive she would object to this site not because of the possibility that it would deter businesses from locating there but because she would not want to see the children who would be living there at risk from the overhead power lines carrying 33,000 volts - the magnetic field created by these currents have been proven to cause leukemia in young children - nor would she want the risk from the traffic exhaust fumes carrying lead poison blowing across the site on the prevailing westerly wind which would be absorbed into their bodies directly and via the food they eat. These fumes have only recently been proven to cause asthma in children living close to main roads. If this site was used for housing and I was looking for a bigger or smaller home in an area I love, I would not buy or want one because of the reasons above but I would have a choice. Have the planners considered giving the Gypsy Travelers a choice or is it go where you're told. Could it perhaps be deemed racist to virtually tell a minority group to do as they are told if it puts them at potential health risk. This plan is so wrong and should be changed. There are many other reasons more detailed and technical listed in the Ringland Matters Group objection letters which I also fully endorse.

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Council Response

Objection noted. The site is adjacent to the settlement boundary and considered to be a sustainable location. More remote locations that are further outside of the settlement boundary have poorer access to amenities and place more of an emphasis on car travel, therefore deemed to be more unsustainable.

Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

No concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.
**Representation Details**

by:  (No grouping)

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**Document:** Revised LDP, p.76

**Policy:** H16.01

**Map:** Proposals East: Proposals Plan - East

**Summary:** Object to Gypsy and Traveller site allocation at Former Ringland Allotments.

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**Item Question**  
Re: Revised Deposit Local Development Plan 2011-2026

**Representation Text**

Gypsy Travelers At The Cot Hill -Ringland Allotment- Site

I wish to record my objection to the proposal to put Gypsy Travelers on the site known as the Ringland Allotments. This site is on the main route into Newport that leads to the growing business area of Newport Retail Park; which is currently the main shopping centre of the City. I guess it was the planners intention to be up front and honest with would be potential businesses who maybe considering to locate there to show them that they would have as near neighbors a traveling community of Gypsies. Travelers some of whom may well be permanently sited there.

It is not the people who would occupy the site that I am concern about but the image of a camp site on a main route into the City. During the many years I have lived in Newport - all of my life- I have met some of the travelers. In fact one of my very good friends was married to a gypsy until she died last year and lived not far away. It was she who once told me that gypsies would not wash the top half of their bodies in the same water that they had washed the bottom half in. That belayed the lie that some believed when I was a child that gypsies were dirty.

She was a lovely lady full of friendship and compassion and I know If she was alive she would object to this site not because of the possibility that it would deter businesses from locating there but because she would not want to see the children who would be living there at risk from the overhead power lines carrying 33,000 volts - the magnetic field created by these currents have been proven to cause leukemia in young children- nor would she want the risk from the traffic exhaust fumes carrying lead poison blowing across the site on the prevailing westerly wind which would be absorbed into their bodies directly and via the food they eat. These fumes have only recently been proven to cause asthma in children living close to main roads. If this site was used for housing and I was looking for a bigger or smaller home In an area I love, I would not buy or want one because of the reasons above but I would have a choice. Have the planners considered giving the Gypsy Travelers a choice or is it go where you're told. Could it perhaps be deemed racist to virtually tell a minority group to do as they are told if it puts them at potential health risk.

This plan is so wrong and should be changed. There are many other reasons more detailed and technical listed in the Ringland Matters Group objection letters which I also fully endorse.

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**Item Question**  
Council Responses

**Council Response**

The Council has a duty under the Housing Act 2004 to identify the need within its area for gypsy and traveller sites, and to then take steps to address the need. The LDP must provide sufficient land to meet the identified need arising during the Plan period. The Council is aware of the financial implications to its budget of meeting this requirement.

With regards to health issues and pylons - No concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.
French, Janet

Revised Deposit Local Development Plan 2011-2026

Gypsy Traveler Ringland Allotments

I understand that if I do not agree with the plan to put Gypsies and travelers on the Ringland Allotments, I have to submit a protest letter to the council. This I now do with this letter. If whoever drew up this plan had bothered to check the police records of anti social behavior in the Dawson Close area they would find in the records that the underpass that links us to Cot Hill and the village of Llanwern, has been a priority area on a number of occasions, to many for me to recall. If your plan was to be implemented this would exacerbate the situation and life for me would be hell. I have often been to afraid to go out when the underpass was full of rowdy youths and nervous of leaving my home unattended. Is this the life you would burden me with? And don’t try to tell me travelers don’t have any naughty children; all communities do and you want to bring two of them together.

NO thankyou very much! What about the council’s duty of care to residents like me. I am 76 this year and I wish to spend the rest of my life in reasonable safety. Put them where they want to go at the old speedway site. A site that has not been flooded since the 16000s and is far from a large estate that has enough problems as it is or give them a house like you do with immigrants.

Crime/Perception of Crime – As with any other significant development, the Council has liaised with the police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the police if any incidents of crime that relate to the site are reported.
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<td>11</td>
<td>Please accept my objection to the plan to place Gypsy Travelers close to the new high school at the Hartridge Farm Road. To Locate a travelers park so close to a school full of teenagers does not make sense it is like lighting a bar-b-cue in a fireworks factory. I can but wonder what other bright ideas this council can come up with. You will have school children using the same road as the travelers and their children. That has the potential for conflict. The travelers realize this, that is why at a public meeting one said we do not want to go near the school, we don't want trouble but if it happens we will handle it This does not mean that travelers are likely to cause conflict, sadly we have enough young people who it seems are hell bent on causing problems and soon they may have a minority group to blame for anything and everything. By 2026 this site is likely-if it goes ahead to be the largest bar perhaps one in Europe one that will be larger than the guidelines state. I suggest these guidelines were drawn up by people with reasoned logic and common sense who were not afraid to see the potential ill will that large sites which could dominate a small local community might cause. It can only be unreasoned, illogical, senseless arrogance to ignore this or to suggest they are merely guidelines. Just how arrogant can you city councilors get!</td>
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<td>It is acknowledged that the size of the Hartridge Farm Road site is larger than Welsh Government guidance suggests, however, it will not result in the largest Gypsy site in Europe. The Hartridge Farm Road site will avoid the need to split the individual families, which is an important factor for the families themselves. The size is sufficient to accommodate all 3 families, which would meet Newport’s residential need for Gypsy/Traveller provision. The proposed layout would use screening to effectively create 3 independent sites within the curtilage of the whole site. The site would also be screened from the road and nearby residential properties. The site will be well screened and should not impact on Llanwern High School. Perception of Gypsy/Travellers at the School is something that the Council will need to address through interaction with the Head Teacher and Governors.</td>
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I don't think it is the right or sensible decision to use the area known as the Ringland Allotments for a transit or overflow site for travelers or gypsies. It is an uneven site too close to the SDR dual carriageway with heavy vehicles pass at 50+MPH day and night and I therefore believe it would not be an ideal place for a permanent encampment due to the noise, fumes and high voltage power pylons and wires that blight the entire site. These problems would effect the quality of life for permanent residents and/or transit residents. A further problem with its use for transit residents would be access to and from the site, even with a new or repositioned entry/exit it would mean at best a slow moving towed vehicle or at worst the same in convoy. The site is also on high ground above the estate houses on the other side of the SDR which are reached via an underpass that is prone to flooding in wet weather, a caravan park is likely to make this problem worse. When not flooded the underpass is a mecca for youths to use for underage drinking and other anti social behavior. If you add all the above up it comes to a massive NO to an ill thought out plan that certainly does not meet with my approval. I am sorry but I say no and object to this element of the plan.

**Council Response**

Objection Noted. Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development. The results of these surveys have confirmed that some ground re-profiling works will be required at the Former Ringland Allotments. This work will add to the development costs but is not considered to be insurmountable.

No concerns with regard to health implications have been raised by Environmental Health or the Utility Providers. A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.
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**Document:** Revised LDP, p.76

**Policy:** H16.01

**Map:** Proposals East: Proposals Plan - East

**Summary:** Object to Hartridge Farm Road Gypsy and Traveller site allocation.

**Item Question**

11

**Representation Text**

I am a student prefect at Llanwern High and use the access road into school most days from the SDR roundabout at Ringland Circle having being dropped off by the gates of the Sewage Plant. The plan to put a Gypsy-Traveller site adjacent to the school off the same road HFR is of concern for me. I will not be happy traveling the short distance to school as I suspect there will be considerable bickering between the travelers kids and some of the school kids. There is always a few who want to show off who will try it on possible leading to more aggressive behavior. Something I would not wish to get involved with. Llanwern High as it is now named is a good school, a new school with a good ethos. Most students are well behaved and are happy to conform for the wellbeing of all. However I feel it would not take much teasing, baiting, bickering to cause some to take the bait and react irresponsibly and as a result bring the school into disrepute starting it on a downward spiral. If this should happen a prestigious very expensive modern educational establishment would be tarnished forever. Even if discipline was firm and the problem resolved some of the parents of the more able students would be less likely to register their children there and any hoped for recovery would be difficulty to achieve.

Think again Newport: As a current student of an exceptional school I object to your plan.

**Council Responses**

13

**Council Response**

The site will be well screened and should not impact on Llanwern High School. Perception of Gypsy/Travellers at the School is something that the Council will need to address through interaction with the Head Teacher and Governors. As with any other significant development, the Council has liaised with the Police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the Police if any incidents of crime or anti social behaviour that relate to the site are reported.
I want to record my objection to the council's decision to locate a traveler's camp at Hartridge Farm Road. Some years ago there was an illegal site where the RSPCA is now. Some of the Hartridge High School less well behaved students would throw stones at the camp and the head teacher was asked to tell them to stop and the police were involved so this will be a matter of record. That is why the travelers have declared that they do not want to go there. At the first meeting in the Ringland Community Centre, a traveler said they did not want trouble but if it happened they would handle it. Has the council considered the risk of conflict that will be a result of this stupid plan. Anyone who considers it is sound judgment to put a traveler's camp so close to a £29M brand new high school should never be responsible for making decisions that require intelligent resolve. I also agree with all the points that the Ringland Matters Group have put forward.

The site will be well screened and should not impact on Llanwern High School. Perception of Gypsy/Travellers at the School is something that the Council will need to address through interaction with the Head Teacher and Governors. As with any other significant development, the Council has liaised with the Police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the Police if any incidents of crime that relate to the site are reported.

Item Question: Representation

11

I want to record my objection to the council's decision to locate a traveler's camp at Hartridge Farm Road. Some years ago there was an illegal site where the RSPCA is now. Some of the Hartridge High School less well-behaved students would throw stones at the camp and the head teacher was asked to tell them to stop and the police were involved so this will be a matter of record. That is why the travelers have declared that they do not want to go there. At the first meeting in the Ringland Community Centre, a traveler said they did not want trouble but if it happened they would handle it. Has the council considered the risk of conflict that will be a result of this stupid plan. Anyone who considers it is sound judgment to put a traveler's camp so close to a £29M brand new high school should never be responsible for making decisions that require intelligent resolve. I also agree with all the points that the Ringland Matters Group have put forward.

Item Question: Council Responses

13

The site will be well screened and should not impact on Llanwern High School. Perception of Gypsy/Travellers at the School is something that the Council will need to address through interaction with the Head Teacher and Governors. As with any other significant development, the Council has liaised with the Police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the Police if any incidents of crime that relate to the site are reported.
When I was quite younger I always wanted to go with my friend and her dad to his allotment but my grandfather would not let me. He told me that it was not good to go so near to the pylons on the allotments and that it would make me ill if I went near them. I did not understand and would often cry. Much later when I was a student at Hartridge High I learn to use a computer and the internet. Remembering the time when I could not go onto the allotments I thought I would try to discover why my granddad was so adamant that I shouldn't. My research showed me why. Some years ago studies in Sweden were produced that proved children living too near overhead power lines carrying high voltage electricity had a much higher incidence of leukemia than those who did not. It is for this reason that I object to the area being used for a camp that will be bound to have children and I am sure if you had known about this you would not have included the site in your plans.

Now the road has been made wider (two lanes) there is also the risk of other health problems from the fumes that are emitted from the high number of heavy traffic that use the road to and from the Industrial and shopping areas at Newport Retail Park and beyond.

I also agree with all the points that the Ringland Matters Group have put forward.

Item Question  Council Responses

13

Health Issues and Pylons - No concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.
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Document: Revised LDP, p.76
Policy: H16.01
Summary: Objection to Proposed Gypsy and Traveller site at Hartridge Farm Road.
We the undersigned wish to register our objection to the Gypsy and Traveller site proposed at Hartridge Farm Road.

Our reasons are summarised as follows:

Size – The proposed size of the site is unimaginable and is far outside the Welsh Assembly Government’s Guidelines and Good Practice. The site is intended to have up to 43 pitches with each pitch having up to 3 to 4 caravans. This will make this site not just the biggest in Britain but the biggest in Europe. Such a development will not be in the interest of residents or travellers alike wherever that area is located and will not be in the interest of Newport itself. Further a site of this scale will not encourage the integration of travellers within the community but is likely to have the opposite effect. Therefore the proposal itself is inconceivable.

Layout – The proposed layout is contrary to the good faith of the Welsh Government’s Guidelines and Good Practice. To take a single large site and split it into three sites to house all three families flagrantly contravenes the guidelines and will dominate the immediate small community. It is also unfair to the travellers as they do not want communal sites as it will promote conflict within the families as well as likely to infringe the human rights of both the travellers and the immediate communities alike.

Location – This site is not suitable and other sites are more suitable. The location of the site is regarded by the Travellers themselves as unsuitable as they have justifiable concerns being too close to Llanwern High School with regards to conflict. Their preference is to be more remote. Further considerations should be given other sites such as the former speedway site, and similar, that have previously been nominated by both travellers and non-travellers alike, and to those sites identified in the existing Local Development Plan as being more favourable. The revised version of the plan does not give due consideration to the alternative sites available, nor does it provide sustainable reasons for rejecting those previously preferred.

In the revised draft plan, the Council have favoured sites to the east of Newport as the preferred locations. Travellers have expressed no such preference and are more concerned that selection should be based on the suitability of each individual site.

Current use – The Road Safety Centre is the focal point of contact for all road safety education, training and publicity service in Newport and surrounding area. To lose this facility would be a great loss to Newport as some courses in particular develop an understanding of behaviour and attitude and build confidence in the students (especially those of low attainment) themselves and many go on to a career in motor maintenance and the like from the experience and knowledge they have gained. Further, the Centre is within walking distance for the Llanwern High School pupils.

Proximity to Sewage Pumping Station – The site is located within a close proximity to a sewage pumping station. There may be health implications linked to the airborne particles produced by these stations.

Access – The site has restricted access along a lane adjacent to two schools. The schools attract a tremendous amount of traffic at peak times while Hartridge Farm Road alongside the houses there are no footpaths, no street lighting and the road narrows to just 15 feet. The road leading up to the site is in poor condition and barely suits its current needs. This would need extensive and costly refurbishment. The Policy Review Group has already identified and recorded vehicle access issues for the triangular site but is now choosing to ignore it.

Llanwern High School – Because of parents’ perception of traveller sites, rightly or wrongly, it would undermine the Council’s strategy of improving education in the east of the city. (Prior to the building of the new High School parents were reluctant to send their children to the old Hartridge School, choosing St Julian’s, Caerleon, Caldicot or Chepstow Schools instead). The remarkable transformation of the new building and the look, attitude and pride of the pupils has changed that. However, all the good work put into the new school could be undermined and the impressive new Llanwern High School could become a very expensive, underused, facility.

Ysgol Gymraeg Caesnewydd – Again because of parents’ perception of traveller sites, rightly or wrongly, parents are likely to reconsider their choice of school for their children. This would undermine further the already fragile financial position of the school thus denting future needed investment.

Financial Matters – The Council’s financial strategy will also be undermined because the proposed site is designated for building and the capital receipts used to offset the cost of the new Llanwern School and so reduce the Council’s debt.

RSPCA Centre – For years the RSPCA Centre and the residents have co-existed amicably. The dogs are rarely noisy, unless they are disturbed. They would be constantly disturbed if there was a traveller site next door. This would result in stressed animals and residents, including the travellers themselves. RSPCA staff and volunteers daily exercise the dogs but say they could not risk walking their nervous, abandoned charges passed a travellers site.
Land Presentation – The topography of this site, as it stands, is not totally suitable for the proposed use. Again the Policy Review Group has already identified and recorded that the topography of the triangular site is unsuitable but is now choosing to ignore it.

Amenities – Access to local amenities is via an underpass to Ringland. This underpass has in the past been often locked due to safety and anti-social behaviour issues. Such issues are likely to be considerably exacerbated by the proposed development thus putting travellers and their families at risk. The Travellers themselves have also expressed concerns.

Noise – As the site is adjacent the busy main railway line there will be noise problems that will be a particular issue for caravans. A noise attenuation fence is proposed here but due to the level of noise will be of little effect.

Potential danger caused by animals – it is well know that many traveller families keep a stock of ponies and horses now or in the future. There are many well documented examples of these animals escaping their confines. An animal of this nature running out onto the Railway, SDR or found wandering through the adjacent Schools or neighbouring Ringland Estate or Llanwern Village will undoubtedly cause issues and even cost lives in the case of the Railway or SDR.

Aspect – The site will be highly visible from the busy mainline railway and would potentially create a poor image of Newport.

The Process – The Scrutiny Report dated 29th October, 2012 and, consequently, accepted by Cabinet on 12th November 2012 is inconsistent, biased, is incomplete in its assessment made and offers no analytical evidence of the preferences made for the selection of travellers sites as claimed. The Policy Review Group recommendations display a lack of understanding of the Travellers needs which was further reinforced by a member of the Policy Review Group during Full Council on 4th June 2013 displaying a serious lack of understanding of what constitutes a Travellers Site thus casting further, serious, doubt on the integrity of the aforementioned report they produced.

In conclusion this site is neither suitable for the provision of traveller sites nor is such a massive site, the biggest in Europe, in the interest of Newport. Further the integrity of the Policy Review Group’s Report, recommendations and conclusions are questionable for the reasons given. Moreover, there are no sound reasons for removing the sites previously proposed.
It is acknowledged that the size of the Hartridge Farm Road site is larger than Welsh Government guidance suggests, however this will avoid the need to split any of the individual families, which is an important factor for the families themselves. The size is sufficient to accommodate all 3 families, which would meet Newport’s residential need for Gypsy/Traveller provision. The proposed layout would use screening to effectively create 3 independent sites within the curtilage of the whole site. The site would also be screened from the road and nearby residential properties.

The site is within the settlement boundary and considered to be a sustainable location. Remote locations outside of the settlement boundary have poorer access to amenities and place more of an emphasis of car travel, therefore deemed to be more unsustainable. Site design can ensure it is well screened from the nearby RSPCA Centre and Llanwern High School.

The Road Safety Centre at the site would need to be relocated. The Council will assist with the relocation as best it can. This would be the case for any proposed use of the site.

With regards to the proximity to Sewage Pumping Station, no concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

It is acknowledged that the Hartridge Farm Road site will require improvements to the access road including the provision of a length of pavement. This will be agreed as part of a planning application and is not considered insurmountable.

The site will be well screened and should not impact on Llanwern High School or Ysgol Gymraeg Caesnewydd. Perception of Gypsy/Travellers at the Schools is something that the Council will need to address through interaction with the Head Teacher and Governors.

The Council is aware of the financial implications to its budget.

The draft indicative layout of this site shows that a significant buffer could be provided between the RSPCA Centre and the pitches.

Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development. Ground re-profiling works will be required at Hartridge Farm Road and the work will add to the development costs, but is not considered insurmountable.

It is agreed that the locking of the underpass is something that needs to be avoided in order to ensure access to local amenities. The site is also within a short walk from Newport Retail Park.

A noise assessment has been undertaken for Hartridge Farm Road. It is proposed that a 1.8m high noise attenuation fence is constructed adjacent to the RSPCA Centre, alongside the mainline railway and between the SDR and north-eastern part of the site.

The Council has a duty to provide accommodation for the gypsy/traveller population. We do not have a duty to provide land for horses. The site will be owned and managed by the Council and there is no intention to allow the occupants to keep horses on site.

A noise attenuation fence will be constructed alongside the mainline railway and the area will be well screened.

The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.
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Document: Deposit Plan, p.76
Policy: H16.01
Summary: Objection to Hartridge Farm Road G&T Site
I am writing to register my objection to the Gypsy and Traveller sites proposed for the Road Safety Centre in Ringland.

My reasons are summarised as follows:

Current use – This site is stated in the report as the Former Road Safety Centre. It is in fact not former and remains in use and is the focal point of contact for all road safety education, training and publicity service in Newport. The Safety Centre has no plans to relocate due to the expenditure of doing so. To label it ‘former’ in the report is entirely misleading and could have led to Councillors concluding their preferred sites under a false notion.

Proximity to Sewage Pumping Station – this site is located within a close proximity to a sewage pumping station. There are many health implications linked to the airborne particles produced by these pumping stations.

Access – This site has restricted access along a lane adjacent to two schools. The schools attract a tremendous amount of traffic at peak times while Hartridge Farm Road alongside the houses there are no footpaths, no street lighting and the road narrows to just 15 feet. The road leading up to the site is in poor condition and barely suits its current needs. This would need extensive and costly refurbishment.

Llannwern High School – Because of parents’ perception of traveller sites, rightly or wrongly, it would undermine the Council’s strategy of improving education in the east of the city. (Prior to the building of the new high school parents were reluctant to send their children to the old Hartridge School, choosing St Julians, Caerleon, Caldicot or Chepstow Schools instead). The remarkable transformation of the new building and the look, attitudes and pride of the pupils has changed that. However, all the good work put into the new school could be undermined and the impressive new Llanwern High School could become a very expensive underused facility.

Financial Matters – The Council’s financial strategy will also be undermined because the proposed site is designated for building and the capital receipts used to offset the cost of the new Llanwern School and so reduce the Council’s debt.

RSPCA Centre – For years the RSPCA Centre and the residents have co-existed amicably. The dogs are rarely noisy, unless they are disturbed. They would be constantly disturbed if there was a traveller site next door. This would result in stressed animals and residents, including the travellers themselves. RSPCA staff and volunteers daily exercise the dogs but say they could not risk walking their nervous, abandoned charges passed a traveller site.

Land Presentation – the topography of this site, as it stands, is not totally suitable for the proposed use and would require re-grading.

Amenities – Access to local amenities is via an underpass to Ringland. This underpass is most often locked due to safety and antisocial behaviour issues. Such issues are likely to be considerably exacerbated by the proposed development.

Noise – As the site is adjacent to the main railway line there will be noise problems that will be a particular issue for caravans.

Potential danger caused by animals – it is well known that many traveller families keep a stock of ponies and horses. There are also many well documented examples of these animals escaping their confines. An animal of this nature running out onto the SDR or found wandering through the adjacent Schools or neighbouring Ringland Estate will undoubtedly cause issues and even cost lives in the case of the SDR.

The Report – The Scrutiny Report dated 29th October, 2012 and, consequently, accepted by Cabinet on 12th November 2012 is inconsistent, incomplete in its assessments made and offers no analytical evidence of the preferences made for focal changes.

To sum up, this site is not in the slightest bit suitable for the provision of homes for gypsy traveller families. Fortunately the former Speedway site offers a much more suitable alternative. Moreover, there are no sound reasons for removing the sites previously proposed. Even the Welsh Assembly agreed that they were acceptable.
It is acknowledged that the size of the Hartridge Farm Road site is larger than Welsh Government guidance suggests, however this will avoid the need to split any of the individual families, which is an important factor for the families themselves. The size is sufficient to accommodate all 3 families, which would meet Newport’s residential need for Gypsy/Traveller provision. The proposed layout would use screening to effectively create 3 independent sites within the curtilage of the whole site. The site would also be screened from the road and nearby residential properties.

The site is within the settlement boundary and considered to be a sustainable location. Remote locations outside of the settlement boundary have poorer access to amenities and place more of an emphasis of car travel, therefore deemed to be more unsustainable. Site design can ensure it is well screened from the nearby RSPCA Centre and Llanwern High School.

The Road Safety Centre at the site would need to be relocated. The Council will assist with the relocation as best it can. This would be the case for any proposed use of the site.

With regards to the proximity to Sewage Pumping Station, no concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

It is acknowledged that the Hartridge Farm Road site will require improvements to the access road including the provision of a length of pavement. This will be agreed as part of a planning application and is not considered insurmountable.

The site will be well screened and should not impact on Llanwern High School or Ysgol Gymraeg Caesnewydd. Perception of Gypsy/Travellers at the Schools is something that the Council will need to address through interaction with the Head Teacher and Governors.

The Council is aware of the financial implications to its budget.

The draft indicative layout of this site shows that a significant buffer could be provided between the RSPCA Centre and the pitches. Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development. Ground re-profiling works will be required at Hartridge Farm Road and the work will add to the development costs, but is not considered insurmountable.

It is agreed that the locking of the underpass is something that needs to be avoided in order to ensure access to local amenities. The site is also within a short walk from Newport Retail Park.

A noise assessment has been undertaken for Hartridge Farm Road. It is proposed that a 1.8m high noise attenuation fence is constructed adjacent to the RSPCA Centre, alongside the mainline railway and between the SDR and north-eastern part of the site.

The Council has a duty to provide accommodation for the gypsy/traveller population. We do not have a duty to provide land for horses. The site will be owned and managed by the Council and there is no intention to allow the occupants to keep horses on site.

A noise attenuation fence will be constructed alongside the mainline railway and the area will be well screened.

The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.
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Document: Revised LDP, p.76  
Policy: H16.01  
Summary: Allocation of the Former Speedway Site for Gypsy & Travellers

**Item Question**  
**Representation Text**

11  Representation  
The Former Speedway Site offers a much more suitable alternative [to Hartridge Farm Road].

**Item Question**  
**Council Responses**

13  Council Response  
Alternative gypsy/traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
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Document: Revised LDP, p.75
Policy: H15.02
Summary: Object to the proposed Gypsy and Traveller site at former Ringland Allotments
I am writing to register my objection to the Gypsy and Traveller site proposed at the Former Ringland Allotments.

My reasons are summarised as follows:

Council guidelines – Part of the original 220 site survey quoted that this site was unsuitable due to there being “Pylons on site and unsuitable access”, this hasn’t changed and remains a major issue. This is one of the main reasons the travellers themselves do not want to occupy this site.

Health issues related to pylons – There are numerous well documented papers relating to the health consequences of living near to electricity pylons. A study of childhood cancers recorded between 1963 and 1995 in England and Wales revealed that there is an increase in risk of children contracting leukaemia of 69% if they live within 200m of a power line and 23% if they live within 600m of a power line.

Location – The Council have favoured sites to the east of Newport as the preferred location. Travellers have expressed no such preference as to the location and are more concerned as to establishing a selection of suitability not location.

Land presentation – This site is not on level ground. The site is on a gradient unsuitable for siting caravans.

Access – Access to this would be shared with the proposed 1100 houses of Gallagher development which would increase traffic many fold on what is effectively a country lane. The turning in and out of the site by vehicles would be problematic given the location of the land and the fact that the road turns directly off from the 50mph limit SDR.

The Council has previously identified this land in part for the provision of a roundabout which would then create an access to the proposed site directly off or close to that roundabout. Such a situation at other possible sites has been condemned by both the Police and Highway Authorities.

Existing use- The allotment site is still a Statutory Allotment site and is not surplus to the requirement of the residents.

Aspect- The site is highly visible form the A48 so would potentially create a very poor image of Newport as this is one the major routes into the city. The site would afford no privacy for the families living there.

Safety – The A48 is a very busy major route into Newport and has a 50mph speed limit and the regular movement of heavy goods vehicles. Caravans and trailers would severely worsen the road safety situation.

Environmental - Council guidelines dictate that when selecting sites priority should be given to Brown Field. This area is an undeveloped green field site which is outside current development boundaries and currently provides a green wedge.

Amenities – Access to local amenities is via an underpass to Dawson Close in Ringland. This underpass has previously had to be locked on a regular basis due to safety and antisocial behaviour issues. Such issues are likely to be considerable exacerbated by the proposed development. The access to the underpass is also often affected by flooding during periods of heavy rain.

Floodings – The A48 is often affected by flooding due to run off of surface water from the site and this would be exacerbated by the proposed development. Pooling water on a main access route with a 50mph speed limit creates a considerable safety hazard.

Financial implications – The development of adjacent land for housing by Gallagher Estates would be very unlikely to go ahead if a Gypsy and Traveller site were provided on this land. This would be a loss to the City of amongst other things the payment of the 106 agreement.

Privacy – Due to the closeness of the SDR and the openness of the site there would be privacy issues.

Noise – Due to the closeness of the SDR there would be a noise issue.
Potential danger caused by animals – it is well know that many traveller families keep a stock of ponies and horses. There are also many well documented examples of these animals escaping their confines. An animal of this nature running out into the SDR or found wandering though the neighbouring Ringland Estate will undoubtedly cause issues and even cost lives in the case of the SDR.

The Process- The Scrutiny Report dated 29th October, 2012 and, consequently, accepted by Cabinet on 12th November 2012 is inconsistent, biased, is incomplete in its assessment made and offers no analytical evidence of the preferences made for the selection of travellers sites as claimed. The Policy Review Group recommendations display a lack of understanding of the Travellers needs which was further reinforced by a member of that Review Group, during the Full Council meeting dated 4 June 2013, displaying a serious lack of understanding of what constitutes a travellers site thus casting further, serious, doubt on the integrity of the aforementioned report they produced.

In conclusion this site is unsuitable for the provision of a traveller site. Further the integrity of the Policy Review Group’s Report, recommendations and conclusions are questionable for the reasons given. Moreover, there are no sound, sustainable, reasons for removing the sites previously proposed.

Council Response

Objection noted.

No concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development.

The results of these surveys have confirmed that some ground re-profiling works will be required at the Former Ringland Allotments. This work will add to the development costs but is not considered to be insurmountable.

Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

The Council Strategy is a Brownfield led strategy and preference is given to sites which are previously developed. A number of greenfield sites are within the Plan as they are considered appropriate and well located for development. This is why this site is included.

It is agreed that the locking of the underpass is something that needs to be avoided in order to ensure access to local amenities.

Flood risk at this site is not considered to be a significant risk.

The Council has a duty to provide accommodation for the Gypsy/Traveller population. We do not have a duty to provide land for horses.

The site will be owned by the Council and there is no intention to allow the occupants to keep horses on site.

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
Regarding the matters raised at the last meeting with Stow Hill Councillors on the 6th of July at the Pavilion, Belle Vue Park, I wish to raise one question. What steps are the Council taking to ensure that the housing to be built over the next 15 years, is to be built for local need?

What about the question of housing developers advertising their houses in Bristol only (where they can maximise profit) and not locally in Newport? Newport is not the answer to a shortage of housing land in Bristol. Especially if Bristolians buy property in Newport but contribute nothing to the local community (and complain if their children have to learn Welsh in local schools). Housing policy that deals with local need, and local need only if you please.

A Local Housing Market Assessment has been undertaken to inform the plan, specifically it investigates the overall figures for the number of households requiring additional housing in the area and to determine what this means in terms of market and affordable provision. The LDP provides a supply of housing to ensure that there is enough housing to meet local need. Planning however cannot control who purchases a property.
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<td>Jones Lang LaSalle</td>
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Document: Revised LDP, p.75
Policy: H15
Summary: Objection to proposed Gypsy and Traveller site at Celtic Way.
INTRODUCTION

Jones Lang LaSalle on behalf of LaSalle Investment Management, object to the proposed allocation of the Gypsy and traveller site at proposed allocation H15 (i) Land at Celtic Way, Coedkernew.

Proposed policy H15 (gypsy and traveller transit accommodation) allocates gypsy and traveller transit accommodation at:

i) land at Celtic Way, Coedkernew; and

ii) contingency site at Former Ringland Allotments for either transit or residential accommodation.

All Councils across England and Wales are required to assess the accommodation needs of Gypsies and Travellers and Travelling Showpeople; the Newport City Council Gypsy and Traveller Accommodation Assessment clearly demonstrates a need for both permanent and temporary pitches. As such, this objection does not object to the provision of sites for gypsies and travellers, but questions the suitability of the specific site proposed for allocation at Celtic Way.

Government Circulars 78/91: Travelling Showpeople and WAG Circular 30/2007 – Planning for Gypsy and Traveller Sites set out a planning process by which councils should identify appropriate sites. Guidance states that ‘local planning authorities will need to demonstrate that sites are suitable.’ (Circular 30/2007 para. 17). In the instance of Celtic Way, it is not considered that this requirement has been appropriately fulfilled by Newport City Council.

It is considered that the key criterion for assessing gypsy sites set out in the Newport Local Development Plan 2011 – 2026 within Policy H17 are not adequately met through the proposed allocation at Celtic Way site, namely that:

i) the site is well related to suitable community facilities and services for the prospective occupants;

ii) the site is capable of being served by utilities including sustainable waste disposal and recovery and emergency services;

iii) the site is not within areas at high risk of flooding, given the particular vulnerability of caravans;

iv) there is an identified and genuine, local need for accommodation for the occupiers”.

LaSalle Investment Management, object to the proposed allocation of the Gypsy and Traveller site at proposed allocation H15 (i) on the following grounds:

☐ The site is not suitable in terms of location in relation to suitable community facilities and services for the prospective occupants;

☐ The site would not promote safe vehicular and pedestrian access;

☐ The site and its proposed use is in direct conflict with the existing employment/industrial uses in proximity and in conflict with policy EM1(i) which proposes B1 And B2 employment/commercial uses on the undeveloped adjacent land at Duffryn.

ANALYSIS OF CRITERIA

Is the site well related to suitable community facilities and services for the prospective occupants?

In preparing the LDP the Cabinet was asked to receive and consider supporting documents which set out work undertaken by the Scrutiny Committee on locations for Gypsy and Traveller Sites (November 2012). The Policy Review Group took account of Local Development Plan; the statutory requirements relating to accommodation for Gypsy and Traveller families; and the current and future Gypsy and Traveller needs in Newport.

The Review Group concluded that the site comprising the yard adjacent to the A449, not Celtic Way, should be recommended for allocation in the LDP as the preferred transit site; subject to any access...
issues being resolved. Land at Celtic Way, Marshfield was recommended to be allocated in the LDP as a contingency transit site in the longer term. The report summarised that the Celtic Way site was not the preferred site but may have potential as a contingency transit site in the longer term.

The yard adjacent to the A449 was identified as an excellent transit site by Gypsy and Traveller families during the consultation process given its location close to main travelling routes. The Scrutiny Committee were also of the view that it was well placed close to the travelling routes. In the Review of Service Provision for Gypsies and Travellers” (May 2003) a key recommendation (recommendation 5) was made which advised that the Assembly and local authorities should pay particular attention to ensuring that Gypsies and Travellers are consulted on policy developments and that accessible and appropriate consultation methods are adopted. Moreover, WAG Circular 30/ 2007 para 18 states that when identifying sites the local planning authority should work with the Gypsy and Traveller community. It is considered that the yard adjacent to A449 site should have been considered more favourably and has been prematurely disregarded by the Council.

WAG Circular 30/ 2007 para 8 states clearly that access to health and education services, and employment and can contribute to greater integration and social inclusion within local communities. Moreover, WAG Circular 30/ 2007 para 19 and 20 make it clear that issues of site sustainability are important for the health and wellbeing of Gypsy and Travellers in respect of environmental issues and social networks. It states that the suitability of a site should be considered in terms of transport mode, pedestrian access, safety and distances from services but also in terms of the following:

The promotion of peaceful and integrated co-existence between the site and the local community

The Celtic Way site does not offer the opportunity for any of the above. The site is not integrated within an existing community and presents the risk for many potential conflicts between the gypsies and travellers and the business community adjacent (this is discussed further below).

The wider benefits of easier access to GP and other services

The Celtic Way site is not considered to be in a suitable location in relation to linkages to traveller routes or existing community facilities and services given its peripheral location on the outskirts of the city, on an industrial/commercial estate. The nearest school is circa 2 miles away (Duffryn High School and Saint Joseph's Roman Catholic High School) and the site is circa 4.5 miles away from the City centre and main health, worship, leisure and retail opportunities. This will have an exclusionary result, leading to division of the Gypsy and traveller community from the existing communities and services of Newport.

Access to utilities including waste recovery and disposal services

Access to utilities are also limited; in the Site Appraisal and Scrutiny Review (May 2013) it is stated that the Celtic Way site would require a new off-site water mains and associated infrastructure, along with an offsite sewer connection in order to make it a viable location for a transit site.

Children attending school on a regular basis

The site offers limited access to schools in the area, not being within a practicable walking distance of a secondary and primary school. This is not conducive to regular school attendance if there is no availability within these schools.

Suitable safe play areas

The sites location within an existing commercial/employment estate is not conducive to child safety. The vehicular traffic along the road to the site is heavy and the commercial uses adjacent to the site generate HGV traffic as well as regular normal vehicular traffic throughout the day.

Moreover the site is located on a roundabout which significantly increases the risk to child safety in this area.

In conclusion it is considered that the Celtic Way site is not suited to a transit traveller site and that an alternative site should be considered.

Is there safe and convenient vehicular and pedestrian access?

As mentioned above, it is not considered that this site offers a safe access for pedestrians, particularly for children.
The site is accessed via a roundabout spur on Celtic Way junction with South Lake Drive, the spur is currently blocked off to prevent unauthorised access into the land beyond. In terms of vehicle access, the proposal does not give rise to any concerns in terms of highway safety or capacity. However, with regard to pedestrian access and movements, there is concern that the site and the surrounding highway of Celtic Way and South Lake Drive do not have footways and pedestrians would be expected to either walk on the carriageway or on the verge adjoining the carriageway. The roundabout and South Lake Drive do not benefit from street lighting. This gives cause for concern about pedestrian safety and the accessibility of the site by means other than the private motor vehicle.

Moreover, the risk for conflict between pedestrian and vehicles is significantly higher in this location due to the nature of the surrounding land. The land around the site is used for industrial and commercial purposes, generating HGV and large vehicle traffic. There is also land at Duffryn to the south of the site which is allocated for further employment development in the LDP, which will only serve to exacerbate the risks for future gypsies and travellers visiting the site.

NCC Street Scene made representations to the consultation which were discussed by the Review Panel (2012); their representations also raised serious concerns with the Celtic Way site.

In summary it is not considered that this site provides safe pedestrian access for travellers and gypsies and their families.

Is there conflict with surrounding business related uses?

This area is a key location within Newport for economic growth, job creation and future commercial and industrial prosperity.

There have been numerous responses from the business community in relation to the Celtic Way site. The main issues raised were relating to the economic impact; facilities and a potential poor image of Newport.

Quinn’s Radiators are the largest, state of the art, domestic radiator manufacturer in the world and they are a key occupier in the surrounding industrial estate. Global customers, suppliers and competitors visit the site; it is suggested that the proposed site could deter investment interest by creating an undesirable image for the business. In addition, it is considered that a transit site in this location, situated at a central junction between existing employment development and proposed employment land at Duffryn, could also act as a deterrent to other potential future occupiers looking to invest in the site.

The technical officers considered that enhanced screening and landscaping could help to alleviate some of these concerns but it does not alleviate the fundamental discourse between a residential use on the site and the potential for conflict which could arise from the surrounding employment uses.

The Site Appraisal and Scrutiny Review (May 2013) para 2.3.2 identifies that the land at Celtic Way also has a potential investor interested in the site and the surrounding land. Although it has not been possible to obtain further information about the potential investor or the likelihood of the investment going ahead, this is considered to be a key disadvantage for allocating the site for gypsy and traveller uses. If the site is the subject of interest by an investor, this allocation would act to prejudice the potential of the site and could result in the loss of a valuable investment in the City.

In summary, it is considered that the relationship between the proposed residential use and surrounding businesses will be very controversial. It is also considered that the expanding employment uses earmarked on adjacent land within this will generate a longer term conflict between the two uses.

It is considered that further investigation should be made into the potential investment opportunity on the site to determine its status prior to any allocation being made.

I would be delighted to speak to Officers, should you wish to discuss any of these points further.

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12/02/2014
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Business – It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

Location and Design – The proposal is for a transit site providing temporary short-term accommodation, rather than a permanent place to live. In this context, the adjacent land uses to the Celtic Way site are not considered to be hazardous, however it is agreed that they are not suitable places for children to play. The indicative layout of the transit site will include green areas for play and therefore children will have onsite facilities.

24/7 access of HGV/movement of employees – The site will be designed as a transit site and therefore only used by Gypsy/Travellers on a temporary basis as they pass through Newport. It is expected that the Gypsy/Travellers will use their vehicles to move around and there will be limited activity in terms of moving around the area on foot. Therefore the fact there is poor street lighting and a lack of pavement is not considered to be a significant concern. Increased street lighting could be provided if Members consider it to be essential.

Cardiff to Newport dual carriageway is within 0.5 miles – The fact a main transport route is in close proximity to the site is considered more of an asset than a safety risk. There are numerous homes within Newport which are within 0.5 miles of a dual carriageway or motorway.

Police/Crime/Perception of Crime – As with any other significant development, the Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.

Education – As this site will only be a transit site for Gypsy/Travellers to temporarily stay, it is unlikely they will seek school places for their children.

Environment – The transit site will be clearly defined, maintained and managed. Any unauthorised expansion onto the SSSI is likely to be dealt with swiftly with Police action, who will be able to move on unauthorised encampments once the Council has a transit site.

Alternative Sites – Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

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Newport City Council Local Development Plan

Representation Details

Rep'n/Para/Policy  Representer  Agent  Accession No  Date Lodged  Late?  Source  Type  Mode  Status  Status Modified
3899.L1//SP17  AWG Property Ltd  GVA Grimley  06/08/2013  E  O  I  M

Additional material submitted - Please click here

Document: Revised LDP, p.32
Policy: SP17
Summary: Over provision of employment land - therefore allocate Celtic Spring as a regeneration opportunity, including residential.

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| CE1, CE2, CE4  |  |  |
| 11 11  | Representation  
|  | Allocation of Celtic Springs as a regeneration opportunity - including residential development.  |
| 12 12  | Speaking at Public Examination  
|  | Wish to discuss the context and reasons for seeking the deletion of the remaining land at Celtic Springs from Policy EM1 and its allocation as a mixed use development opportunity under Policy EM2. It will be necessary to speak to provide an overview of the site's history and market context, together with explaining the rationale for its future development for mixed use.  |
| 13 13  | Council Response  
|  | Celtic Springs will be allocated for 6 hectares of B1 Use. We are aware that the developer of the site has been trying to market the site for a number of years, but to no avail. In accordance with proposed policy EM4, alternative uses of employment land will be assessed against a list of criteria. Information that demonstrates that the site and property has been marketed for a new employment use and that an on-going use is no longer viable is one such criterion. If appropriate evidence was submitted to the Council, then a scheme to incorporate residential development at Celtic Springs might be acceptable. The Council would need to be satisfied that the proposed residential use integrates well with the existing employment land uses in the vicinity. As no such evidence has been presented at this stage, it is considered that the Celtic Springs allocation will remain as per the Plan.  |
### Representation Details

**Document:** Revised LDP, p.79  
**Policy:** EM01.03  
**Summary:** Over provision of employment land - therefore allocate Celtic Spring as a regeneration opportunity, including residential.

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|      | CE1, CE2, CE4 | Over provision of employment land - therefore allocate Celtic Spring as a regeneration opportunity, including residential. |
| 11   | 11       | Representation  
|      | Speaking at Public Examination | Wish to discuss the context and reasons for seeking the deletion of the remaining land at Celtic Springs from Policy EM1 and its allocation as a mixed use development opportunity under Policy EM2. It will be necessary to speak to provide an overview of the site's history and market context, together with explaining the rationale for its future development for mixed use. |
| 12   | 12       | Soundness of LDP  
|      | No | |

### Council Responses

Celtic Springs will be allocated for 6 hectares of B1 Use. We are aware that the developer of the site has been trying to market the site for a number of years, but to no avail. In accordance with proposed policy EM4, alternative uses of employment land will be assessed against a list of criteria. Information that demonstrates that the site and property has been marketed for a new employment use and that an on-going use is no longer viable is one such criterion. If appropriate evidence was submitted to the Council, then a scheme to incorporate residential development at Celtic Springs might be acceptable. The Council would need to be satisfied that the proposed residential use integrates well with the existing employment land uses in the vicinity. As no such evidence has been presented at this stage, it is considered that the Celtic Springs allocation will remain as per the Plan.
Document: Revised LDP, p.81
Policy: EM02
Summary: Add Celtic Springs as a Regeneration Site - inc residential development

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### Representation Details

**Newport City Council Local Development Plan**

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- **Status:** M
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- **Representor:** (No grouping)

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**Document:** Revised LDP, p.65

**Policy:** H01

**Summary:** Add Celtic Springs as Regeneration Site - therefore added to H1 Policy

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**Item Question**  | **Representation Text**
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10 | Soundness Test
CE1, CE2, CE4

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**Additional material submitted**
11

1. **Introduction**

1.1 This statement has been prepared by GVA on behalf of AWG Property Ltd. (AWG) in response to the Revised Deposit Newport Local Development Plan (RDLDP), published on 13th June 2013. The representations made on behalf of AWG are set out in this statement and accompany the relevant completed Revised Deposit Plan Response Forms.

1.2 In 2001, AWG entered into a Development Agreement with Newport City Council. Since that time, AWG has worked hard to establish Celtic Springs as a successful business location in the City. Over the last 12 years, there has been a significant shift in the market for office space, primarily due to the recent recession, but also due to the changing priorities and objectives of government at the local and national levels, and the changing function and character of Newport and its competitor cities. These changes have placed significant pressure on the ability of Celtic Springs to sustain its early success. AWG has responded to this challenge by reviewing the land remaining for development at the site and identifying an innovative solution which will enhance the attractiveness of the site going forward through the creation of a mixed use, sustainable environment.

1.3 To deliver AWG’s aspirations for the site, a consultancy team has been assembled to define a viable and deliverable development proposal for the remaining land at Celtic Springs. Work is well advanced, and it is anticipated that an outline planning application will be submitted to the Local Planning Authority before the end of 2013. It is considered that the submission of a planning application represents the most effective way to deliver a development package that will assist in protecting the long term viability of Celtic Springs as a quality business location in West Newport. Notwithstanding this, the Council’s work on its emerging LDP is recognised, and these representations are being made to ensure there is consistency between the LDP (when adopted) and the planning permission that will be sought for the site.

1.4 The next section of this statement provides an overview of the current status of the land within Celtic Springs, before setting out AWG’s proposal for its future. The statement concludes by identifying the aspects of the RDLDP we support, and those elements where we require changes to be made.

2. **Celtic Springs: Current Context & Future Position**

2.1 Celtic Springs is an 18 ha (45 acre) business park situated to the west of Newport. The site is close to the M4 junction 28 and is also served by the A48 dual carriageway. Current occupiers at Celtic Springs include HM Justice Department, EADS, Wales and West Utilities, Holiday Inn Express and Greggs. The office space at the Park is supported by a range of ancillary facilities comprising a 100 child nursery, a retail hub, hotel and a pub/restaurant (The Dragon Fly). Businesses presently occupying the remainder of the immediate area, include The Quinn Group, Lloyds TSB, The Patent Office, the Office of National Statistics, International Rectifier and Acorn Recruitment.

2.2 The Park is situated within a mixed use area of Newport on the western side of the City where a variety of established and mixed land uses are integrated amongst existing residential developments. Celtic Way lies to the south of the site and consists of a large area that is presently occupied by Quinn radiators, AluK and Smith News. Adjacent to this, a pattern of both residential and commercial developments border the site and span to the east where a further range of facilities are provided. Pencarn Way offers a substantial range of amenities including St Joseph's High School, an ASDA store and further industrial space. Tredegar House and Park provides an extensive area of public open space and recreation.

2.3 The site was originally developed as a flagships business location in Newport, but despite its early success in securing high profile occupiers, the Park has experienced very limited occupier interest over the last 5 years.

2.4 AWG has utilised the full range of promotional resources available to secure tenants for the available space, and has actively sought occupiers for the 14 acres of remaining redevelopment land. Despite extensive marketing, and the quality of the offer, there has been no serious commercial interest in the existing space or the available development land. 50,000 sq.ft. of office space has remained vacant for over 5 years. This is split between two buildings (28 West Building and Oak House,) both of which have been actively marketed for over 5 years without lettings. In addition, an extant planning permission for office development at the Park’s north eastern end remains to be built out, the consented five star hotel site may revert to office use and the recently closed gastroenterology unit may be converted to office use. Between these three areas, more than 100,000 sq.ft. of space could be provided, without developing the remaining land.

2.5 Celtic Springs competes for occupiers against its immediate locality. Imperial Park, the City Centre and nearby Cardiff Gate. Newport City Homes at The Orb and Admiral at the Cambrian Centre are examples where the City Council and Newport Unlimited wished to see jobs in the centre, to aid the city’s regeneration strategy. The focus on City centre regeneration is clear in the RDLDP. Whilst we wholeheartedly support this objective, it places increasing uncertainty on the likelihood of the remaining land at Celtic Springs being developed for Grade A office space in the foreseeable future.

2.6 Were the RDLDP to continue to envisage all office use at this location, it would imply that in excess of 40,000 sq.m. (450,000 sq.ft.) of space is to be provided at Celtic Springs. That looks ‘wholly’ unrealistic from a property market viewpoint in the plan period, and appears at odds to a city centre focused regeneration objective.
2.7 The Employment Land Review (July 2013) (ELR) which informs the employment policies of the RDLDP estimates that there is a supply of between 7.5 and 9 years of available office accommodation within Newport. It recognises that the RDLDP has been influenced by a national policy objective to prioritise sectors and prestige development through its allocations on premium-quality greenfield sites targeting high-value occupiers, but states that delivering this vision has proved very difficult in practice. The ELR also found that:

“For offices, Newport lacks the critical mass to take on major office destinations such as Bristol or Cardiff. Most demand for larger property is driven by the public sector with the private sector favouring Cardiff.”

2.8 In this context, there is a significant risk that the remaining development land at Celtic Springs will not come forward over the plan period, thereby creating an island of under-utilised land within the urban area. This is clearly not the intention of Planning Policy Wales or the emerging LDP.

2.9 It is AWG’s view that the site offers a significant opportunity to deliver an innovative, mixed use development that can provide a mix of uses to create a highly sustainable community at Celtic Springs that people can work in, live in, and enjoy. The uses envisaged include:

- Residential
- Retail
- Leisure (potentially including hotel/A3/health & fitness)
- Office

3. Representation Statement Preface

3.1 As set out in the preceding sections of this statement, our client, AWG, is currently preparing an outline planning application for the redevelopment of the remaining land at Celtic Springs Business Park to create a truly sustainable, mixed use community. The Business Park already offers a ‘village centre’ with a range of small retail and leisure uses. AWG propose to capitalise on this through the development of new homes at the site which will sit to the north of the existing landscaped lake area and provide a link between the existing office space at the site and the ‘village centre’. The proposals could also potentially include other employment generating uses such as health and fitness and additional B1 office space.

3.2 It is AWG’s view that the ability to live close to the existing employment opportunities will be attractive to both future residents and, importantly, occupiers. The ‘complete’ offer that will be provided at Celtic Springs will give the Park a significant advantage when competing for future occupiers and assist in ensuring that the existing 50,000 sq.ft. of vacant space is occupied before its build quality is surpassed by increasingly stringent national standards for sustainable building.

3.3 These representations to the RDLDP seek to emphasise the strategically important opportunity provided at Celtic Springs and provide a policy framework that reflects the forth-coming planning application and facilitates the delivery of a sustainable mixed use development over the LDP period. Such a policy approach will promote sustainable living, support the City’s growth and secure the longevity of employment within the area.

3.4 In light of this, our representations to the RDLDP are mainly related to the fact that the plan does not recognise the mixed use development potential at Celtic Springs, or allow for its development, and the positive contribution it could make to the aims and objectives of the LDP. We set out below our detailed representations, together with the alterations and amendments required to make the LDP sound.

Representations

3.5 The Foreword to the RDLDP has been prepared by the Cabinet Member of Regeneration and development, Cllr John Richards. He considers that the LDP is ‘fundamental in helping Newport achieve economic recovery by delivering sustainable growth across the City’. Our client’s proposals for the remaining land at Celtic Springs are entirely in line with this sentiment. Positively, there are a number of other elements of the RDLDP which align with our client’s aspirations for Celtic Springs.

3.6 As stated earlier in this statement, Celtic Springs is currently faced with a situation where the primary focus for regeneration is the City Centre as the Council seeks to widen the range of uses and occupiers there to try and combat its poor performance in recent times relative to other competing cities. This is seen as a key element of ensuring the City has a broad and resilient economic base. Whilst AWG fully support this approach, it does create difficulties when they are competing for occupiers.

3.7 In overall terms, there is much that we support in the RDLDP. We welcome a number of the key objectives of the Plan, particularly Objective 1 (Sustainable Use of Land) which seeks ‘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’. It therefore follows that we similarly support the aspirations of Objective 4 (Housing Provision) which seeks ‘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.’

3.8 It is also noted that the introductory chapter to the RDLDP:

- proposes a ‘sustainable development strategy…with a focus on regeneration’;
- recognises the importance of housing to economic development through the creation of jobs in the construction market;
- recognises the need to integrate social, economic and environmental objectives;
- and seeks to improve public transport and minimise the need to travel.

3.9 All of the above accord with AWG’s aspirations for Celtic Springs. As does the over-arching framework provided by Policy SP1 which places sustainability at the heart of the LDP.

Policy Comments & Objections

3.10 The main focus of our representations to the RDLDP is the need to secure a mixed use allocation for the development of the remaining land at Celtic Springs. The land is currently identified as an employment allocation under SP17 and EM1(iii), and we contend that it should be reallocated under Policies H1 and EM2, with corresponding changes made to the plan’s West Newport Proposals Map.

Employment Policies

3.11 Strategic Policy SP17 (Employment Land Requirement) from which the LDP employment allocations (under Policy EM1) flow, makes provision for approximately 168 hectares of employment land over the LDP period 2011-2026. This is considered to be a significant over-provision. This is clear from the supporting text to the policy at para 2.63 which states: ‘...in total, the Plan has a minimum requirement of 35 hectares for new employment land for the Plan Period. The Plan identifies a total supply of 168 hectares of employment land which exceeds the minimum requirement, but is required so sufficient flexibility can be provided to promote growth and also take account of various constrained sites which cannot be considered as ‘normal supply’.

3.12 It is clear that there is an oversupply of employment land allocated in the RDLDP as it currently stands creating an unacceptable imbalance between jobs and new homes, even when taking account of the constrained sites such as Duffryn and East of Queensway Meadows. Removing the remaining 6ha of land at Celtic Springs from this significant over-provision will clearly not create a deficit in the supply of employment land over the plan period.

3.13 The remaining 6ha of land at Celtic Springs is identified under Policy EM1(iii) as an employment land allocation. The policy states that 6 ha of land have been allocated in this location primarily for B1 use. The supporting text to Policy EM1 goes on to state the following regarding this allocation: ‘This development site benefits from excellent strategic connectivity and the intentions for it are primarily for B1 business uses that will integrate well with the existing uses such as the Prison Services Headquarters. Proposals on this site should also have regard to Policy SP18.’

3.14 Policy SP18 refers to land at Duffryn as the main location in West Newport for industrial and business development.

3.15 Whilst we welcome the positive recognition of the future development opportunity presented by Celtic Springs, we do not consider that a solely employment based allocation is the correct policy approach to take in order to bring forward the sustainable mixed use development of this site over the plan period.

3.16 As detailed earlier, the Business Park at Celtic Springs has some 50,000sq.ft (4,645sq.m.) of vacant office space that has remained vacant over the past 5 years. This on-going vacancy is despite extensive marketing of the site that has taken place to identify and source tenants to fill this space.

3.17 This lack of occupier demand at Celtic Springs can be attributed to a number of factors. Perhaps the most important factor has been the changing nature of development in Newport itself over the past few years which has influenced demand and supply of employment space within the Newport area. The success of Cardiff’s St David’s II retail development has had serious consequences for Newport’s retail offer which has suffered decline. This in turn has led to an increase in office-based employment within Newport City Centre as a response to the loss of retail operators. Such an employment focus for Newport town centre has led to a reduction in demand for office space at Celtic Springs, and other office locations outside of the City Centre. Indeed, occupants such as Admiral, the Passport Office and Newport City Homes have all taken possession of office space within the city centre as opposed to the office space available at Celtic Springs.

3.18 The changing context to employment and office requirements within Newport clearly requires a new approach to be formulated and delivered in order to aid delivery of ‘traditional’ employment spaces across the wider city region – particularly those that lie outside of the city centre. The LDP is well placed to positively and proactively address and respond to such current development
influences and to positively plan for the future by providing truly sustainable land allocations that can be delivered over the plan period. Such a new approach will ensure that the right development can be delivered in the right locations.

3.19 It is on this basis that we object to the allocation of the Celtics Springs land under Policy EM1(iii). It is considered that a more positive approach to its allocation should be formulated.

Housing Policies

3.20 With respect to housing provision, it is noted that at para 2.1 the plan identifies a total housing supply of 11,622 units against a requirement of 10,350 units. This provides a flexibility allowance of 12% over the plan period. However, when the housing sites identified by H1 are reviewed, it is apparent that the LDP anticipates that these will deliver 9,533 units over the plan period, with a further 1,526 units coming forward through a combination of windfall, infill and small sites. This gives a total of 11,059 units to be delivered over the plan period, rather than the 11,622 stated by Policy H1. If the plan is only anticipated to deliver 11,059 units, then the flexibility allowance is reduced to 6.8%. Clearly, clarification is required on this point.

3.21 The initial appraisal work undertaken by AWG suggests that the remaining land at Celtic Springs is capable of accommodating around 150 new dwellings, allowing for a mix of uses to come forward on the 6ha site. This equates to approximately 1.4% of the housing supply under Policy H1. If the 150 units capable of being delivered at Celtic Springs were to be included under Policy H1, it would increase the flexibility allowance in the plan to 13% (or 8.3% if the LDP is delivering the lower total of 11,059 units). This is not considered to represent a material change, particularly in the context of the enhancements it would provide to the attractiveness of the existing vacant office space to the occupier and investor markets.

3.22 The following section sets out how we consider that the LDP should be amended in order to provide a positive planning policy framework that will enable the delivery of sustainable mixed use development at Celtic Springs.

4. Proposed Amendments

4.1 As set out previously, we object to the allocation of the Celtic Springs site solely for employment under Policy EM1(iii). This allocation will not provide the required flexibility needed to secure future lettings at the site. The reasons for such an approach to address a significant lack of employment demand have been clearly set out earlier in this Statement.

4.2 In recognition of the site’s mixed use potential, we request that the remaining land at Celtic Springs is allocated under Policy EM2 as a regeneration opportunity. This would be consistent with the overall sustainability aims of the RDLP by encouraging mixed use development in a location which allows for sustainable travel. We therefore seek the deletion of the Celtic Springs allocation under Policy EM1(iii) and its reallocation as a regeneration site under Policy EM2. The supporting text for the proposed EM2 allocation could read as follows:

Celtic Springs

This regeneration site provides a sustainable, residential-led, mixed use redevelopment opportunity. The wider Business Park extends to some 18 hectares (45 acres) in total and is currently home to a number of prestigious businesses. However, the site also contains 4,645 sq.m. (50,000 sq.ft.) of vacant office space that has been vacant for over 5 years. The remaining 6ha of land at Celtic Springs site is therefore allocated as a regeneration site that is suitable for delivering innovative, highly sustainable, mixed use development incorporating a mix of residential, employment and leisure uses that will enhance the present mixed use character of the area in order to promote sustainable living and travel patterns.

4.3 Coupled with this re-allocation of the site as a regeneration site, as opposed to an employment site, the relevant housing policies of the LDP will need to be amended in order to incorporate the residential development provided. At present, the broadbrush masterplanning exercise that has been undertaken by AWG indicates that somewhere in the region of 150 residential units could be accommodated along with the retail, leisure and small office uses. It is therefore requested that Policy H1 also be amended to include recognition of the 150 units that can be delivered at this sustainable location.

4.4 In line with the above suggested amendments to the LDP, we also request that the relevant West Proposals Map be revised accordingly.

4.5 We trust that the LDP will be amended as requested in order to ensure that the Celtic Springs site can be brought forward for future development over the plan period in a sustainable mixed use manner.

5. Test of Soundness

5.1 We contend that without the changes sought in these representations that the RDLP fails the following Tests of Soundness:

CE1 – as due to its significant over-provision of employment land, the plan will not comprise a coherent strategy from which its policies and allocations can logically
**Newport City Council Local Development Plan**

**Item Question**

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<td>Yes</td>
<td>Wish to discuss the context and reasons for seeking the deletion of the remaining land at Celtic Springs from Policy EM1 and its allocation as a mixed use development opportunity under Policy EM2. It will be necessary to speak to provide an overview of the site's history and market context, together with explaining the rationale for its future development for mixed use.</td>
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**Tick-box reply**

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**Council Responses**

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<td>Celtic Springs will be allocated for 6 hectares of B1 Use. We are aware that the developer of the site has been trying to market the site for a number of years, but to no avail. In accordance with proposed policy EM4, alternative uses of employment land will be assessed against a list of criteria. Information that demonstrates that the site and property has been marketed for a new employment use and that an on-going use is no longer viable is one such criterion. If appropriate evidence was submitted to the Council, then a scheme to incorporate residential development at Celtic Springs might be acceptable. The Council would need to be satisfied that the proposed residential use integrates well with the existing employment land uses in the vicinity. As no such evidence has been presented at this stage, it is considered that the Celtic Springs allocation will remain as per the Plan.</td>
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**Justification of Requirement**

Following representations at the Deposit LDP stage the housing requirement figure has been justified and increased from the proposed Welsh Government Population projections. There is scope for an authority to deviate from the WG population projections but this deviation is required to be well evidenced. The NLP assessment sets out this evidence base and illustrates that Newport, as one of the few areas in Wales with an anticipated population increase noted in the Census, is set to grow and reflects the Council’s policy aspiration for growth. It should be recognised that the majority of the sites (46 of 55) have planning permission or permission subject to a Section 106 agreement. This established supply with clear market intent illustrates not only that a growth strategy is appropriate but achievable.

As noted above, the Plan identifies its housing requirement for the plan period based on an assessment of need and this is also true of its employment land requirements. The clear strategy for the Plan is for growth and it will be through the successful implementation of the policies of the Plan that this will be achieved. There is a clear link between housing supply and economic growth which is why the supply will be monitored annually.

The housing section of the Revised LDP does identify 11,622 units; it seems that the respondent has failed to take into account those units already completed from 1st April 2011.

The LDP states that following in respect of Celtic Springs:

“This development site benefits from excellent strategic connectivity and the intentions for it are primarily for B1 business uses that will integrate well with the existing uses such as the Prison Service Headquarters. Proposals on this site should also have regard to Policy Sp18.”

In view of this, and given that ample land has been allocated for residential development, it would be inappropriate to amend the employment allocation at Celtic Springs.
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<td>Delete an existing site</td>
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<td>11</td>
<td>Representation</td>
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<td>I think the LDP is unsound because the employment areas chosen (for future development for employment) all contain risks which threaten future employment opportunities for Newport: The areas to the east of Newport and the area chosen in the docks are both currently undeveloped and will require a great deal of time and money to prepare before they will offer employment opportunities. That leaves the area in west Newport (the site chosen for the gypsy site) which has ready-built units ready to accommodate new business. But this area will be hampered by a gypsy site nearby as it will be harder to attract new businesses there. Unfortunately first impressions count and businesses will seek to set up elsewhere. If the gypsy site is removed from west Newport, Newport will have ready built units to scoop up new businesses. If it stays it could be years before new businesses are ready to move to the sites by the docks or the east of Newport.</td>
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**Item Question** | **Council Responses**
---|---
2 2 Soundness of LDP | No

**Item Question** | **Council Responses**
---|---
13 Council Response | Business – It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

Alternative Sites – Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
### Representation Details

**Document:** Revised LDP, p.25, para.2.37  
**Policy:** SP11  
**Map:** Inset 9: Llanwern Village Area  
**Summary:** Propose amendment to Llanwern Village boundary to allow residential development adjacent to permission for 1100 houses.

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<td>6.6</td>
<td>Amend the boundaries of an existing site</td>
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<td>CE2 AND CE4</td>
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<td>Representation</td>
<td>The development to the north and south of Llanwern Village is a major scheme with high infrastructure costs. It will therefore take a considerable time to come to fruition. This is evidenced by the long time given for submission of reserved matters pursuant to the outline planning permission granted in 2009. The proposed extension to the allocated area shown in red on Plan FH1 and the revisions to Inset Map 9 provided an alternative access into the northern area without the need for traffic to pass the existing houses along the narrow section of Cox Hill and an opportunity for residential development in the short rather than the longer term. The site adjoins the existing approved allocation, is not identified on the Constraints Map and is generally as sustainable a location for new housing as the land to the north. Inset Map 9 should be amended to include the area edged red on the enclosed plans and text amended accordingly.</td>
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<td>Council Response</td>
<td>We wish to speak in the discussions on housing allocations and proposed sites because these issues will need to be discussed in detail at the Hearing.</td>
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### Council Responses

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The proposed development is concerning a parcel of land highlighted as an area of countryside, where development is resisted under all but exceptional circumstances. Moreover, there is no demonstrable need to increase the Eastern Expansion Area, since sufficient housing land has been allocated for the plan period. In view of this, the housing commitment shall not be increased.
The proposed allocation of land at Celtic Way, Coedkernew for a Gypsy transit site I believe is not in the best interest of the City of Newport and has serious flaws for the reasons given below:

Traffic - Celtic Way is located on a thriving and busy industrial/business estate with already heavy local traffic and heavy passing commuting traffic from Cardiff and Newport. The increase in traffic caused by the proposed Gypsy transit site would cause even more congestion and have a significant negative impact on this already busy industrial/business area. Business - Celtic Way is located on a thriving and busy industrial/business estate with the potential to increase industrial/business activity in this area. I would like to know why Newport City Council would want to spoil this potential by using this location for the transit site? This site forms part of an important employment allocation within Newport and is protected for such use by virtue of adopted UDP policy ED1. This allocation is carried forward in the Deposit LDP (policy EM1). It is not considered that the loss of part of the employment allocation would be acceptable and furthermore, the introduction of a site for Gypsy and Traveller accommodation at this location would be incompatible with the adjoining industrial and business land uses. The site also represents a valuable part of the employment allocation which is not affected by any environmental constraints, and so its potential loss for an alternative use should be avoided. I am the sole Childminder in this area and at the moment have a thriving business. I have been approached by a number of worried parents who have heard about the above proposal and are considering ending their contracts with myself if this proposal goes ahead. This is due to them thinking about moving out of the area and also worries about their employers moving out of the area. In this circumstance I would not be able to continue with my business resulting in loss of childcare in the area.

Location - I would like to know why in January 2011 the land Celtic Way was dismissed as being unsuitable due to its location on an industrial/business estate but is now thought to be suitable? What has changed on this location between 2011 and 2013? The area adjacent to Celtic Way has a high voltage electrical supply equipment, which could pose a health risk to residential occupants of the site. The nearest health centre and shops are located over a mile away and public transport is infrequent. There are no play areas within the vicinity. The site does not, therefore, comply with the WG criteria for identifying sites for Gypsy and Traveller accommodation.

Other questions - why after the local elections in May 2012 was the committee asked to re-examine locations for Gypsy and Traveller sites thus scrapping the five allocations previously Proposed and go back to the drawing board on the matter?

Alternative Site - On of the many industrial units off Leeway adjacent to Nash Road.
It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

The proposal is for a transit site providing temporary short-term accommodation, rather than a permanent place to live. In this context, the adjacent land uses to the Celtic Way site are not considered to be hazardous, however it is agreed that they are not suitable places for children to play. The indicative layout of the transit site will include green areas for play and therefore children will have onsite facilities.

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.

The substation is fenced in and secure.

The site will be designed as a transit site and therefore only used by Gypsy/Travellers on a temporary basis as they pass through Newport. It is expected that the Gypsy/Travellers will use their vehicles to move around and there will be limited activity in terms of moving around the area on foot. Therefore the fact there is poor street lighting and a lack of pavement is not considered to be a significant concern. Increased street lighting could be provided if Members consider it to be essential.
Item Question Representation Text
3 3 New Policy Yes

5 5 Add a new site Yes

8 8 Candidate Site Name

Lee Way (off Nash Road)

10 10 Soundness Test

C4, CE1, CE2 & CE4

Representing

Relating to the proposed Transit site in Coedkernew I would like to make the following observations and request clarification.

1. Industry & Business Content from a document generated by Mango for Marshfield Community states that ‘It is unclear why this has now been shortlisted as a potential location for Gypsy and Traveller accommodation (transit only) as it was originally dismissed in January 2011 due to it being located on an industrial site.’ Please clarify what has changed in order for this to now be irrelevant? It is recognised that the business park within Coedkernew (Imperial Park) is a potential area of business growth but the inclusion of a Traveller site would have a serious impact on this. Please disclose the results from any studies performed that have examined the potential effect on the business credibility of this area if Travellers were in residence?

2. Rural as a rural area with natural resources it is has not been made clear why this area has been considered. The Council must recognise from other instances where Travellers have been accommodated that the effect on the environment is very negative from their presence. Therefore we can expect ‘spoiling’ of the rural area to which the Council will be responsible and in turn will have to rectify. As a taxpayer my tax contributions will I assume be used to fund this clear up operation which I am less than happy with.

3. Tourism with the Tredegar House and Caravan Park so close to the proposed site the Council hopefully recognises the negative effect on tourism, and hence the potential for increased revenue by having tourists stay in the area. Please disclose the results from any studies performed that have examined the potential effect on tourism of this area if Travellers were in residence?

4. Security as is aware from other traveller sites in the UK, the security of the local residents is always affected. My partner runs her own Childminding business and is concerned about the children in her care whilst using the local amenities. Additionally, the parents of the children in her care have expressed their concerns and have stated that if a traveller site is located within Coedkernew they may remove their children hence having a direct impact on our ability to be financially sound. My father-in-law who lives and is cared for at the family home is 74 and has a heart condition, takes a walk every day to Asda as part of his daily routine to keep active and have some fresh air etc. We made the move from Cardiff due to residing next to travellers and dealing with the issues that come with that in order to give my father-in-law some well needed freedom and security in his old age. Having the travellers potentially moving so close once again will place my father-in-law back in the same predicament. Unfortunately having spent £20,000 on a purpose built accommodation for him we are financially incapable of moving and once again rebuilding a purpose built dwelling for him. Therefore my father in law would then potentially become a prisoner in his own home for fear of intimidation if he ventured outside within the local community.

Conclusion
Due to the above reasons, and probably many more that concern other members of the Coedkernew community, I would respectfully request that the proposal for a transit site within Coedkernew be abandoned in favour of a more suitable site that would not have a direct impact on anyone within the community. If I had to make a suggestion as to a suitable location for a traveller’s transit site it would be one of the many industrial units in Lee Way, just off Nash Road. This is located near to the A48 and close to local amenities but away from residential areas that may be affected from the travellers.
### Item Question  Council Responses

**13** 13  Council Response

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.

As with any other significant development, the Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

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**3903.L2//H15.01**  Smith, Mr Neil  28/07/2013 E O M

**Summary:** Suggest Lee Way Industrial Estate as an alternative to Celtic Way, Coedkernew.

---

**Item Question  Representation Text**

**11** 11  Representation

If I had to make a suggestion as to a suitable location for a traveller's transit site it would be one of the many industrial units in Lee Way, just off Nash Road. This is located near to the A48 and close to local amenities but away from residential areas that may be affected from the travellers.

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**Item Question  Council Responses**

**13** 13  Council Response

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
Representation Details

Rep'n/Para/Policy  Representer  Accession No  Date Lodged  Late?  Source  Type  Mode  Status  Status Modified
3904.L1/H15.01  May, Mrs Helen  28/07/2013  E  O  M

Document: Revised LDP, p.75
Policy: H15.01
Summary: Delete to the G&T site at Celtic Way, Coedkernew.

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<th>Item Question</th>
<th>Representation Text</th>
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<td>I am concerned about the proposed Gypsy and Traveller Transit accommodation at Celtic Way Coedkernew, as there are highway safety issues. The most direct route on foot from the site to local shops and facilities is along Celtic Way through Imperial park. There are no pavements along that stretch of road until Imperial Park, and some tight bends. As someone who drives past the site twice a day, I know how potentially dangerous it is for pedestrians to walk along the road in that area; I have had to stop in the road on a number of occasions to allow traffic coming in the other direction to pass before I can safely overtake pedestrians in the road. The stretch of road between the site and Imperial Park is until, so at night and in the winter this would become an even greater issue.</td>
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<td>The site will be designed as a transit site and therefore only used by Gypsy/Travellers on a temporary basis as they pass through Newport. It is expected that the Gypsy/Travellers will use their vehicles to move around and there will be limited activity in terms of moving around the area on foot. Therefore the fact there is poor street lighting and a lack of pavement is not considered to be a significant concern. Increased street lighting could be provided if Members consider it to be essential.</td>
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Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
Aluk (GB) Limited is a building systems supplier and we are based at units IP1 IP2 on Imperial Park, Celtic Way. I would like to object strongly to the proposed site for the travellers at Celtic Way. Our concerns are around the security of our assets and welfare of our staff and the image of the business. We were previously based at Queensway Meadows in Newport under the name of Blyweert Beaufort and we moved to this site at Imperial Park over two years ago and currently lease units IP1 and IP2 with an option to purchase.

The business was sold to our new owners who are based in Luxembourg in June of 2012 and we now belong to the global brand “Aluk”. We employ 60 full time staff and are on plan to expand the business over the coming years. The new owners have a preference to purchase the properties that their companies operate from. The Management team in the UK believed that we had selected the right property to allow us to achieve our ambitious growth targets.

The proposals for the Travellers Site is now seriously affecting our internal discussions to allow us to remain and invest as we had planned to do at Imperial Park. Other options are now being discussed that could take the business out of the Newport area. Our experience at Queensway Meadows with the travellers leaves us with no confidence that there will be the monitoring and control at this site. The police or council offered little or no support to the issues we had at Queensway and there were occasions where our day to day activities were affected and there were considerable costs to the business. I have attended a number of meetings and had discussion with other business leaders and the one question that keeps getting raised is that after working so hard to build up the reputation and having been successful in attracting a high calibre of businesses to Imperial Park and Celtic Springs, why would there even be consideration to placing a Travellers Site in this location?

I hope that the concerns and strong feelings of the business representatives are seriously considered, common sense will prevail and this proposal for the Travellers Site at Imperial Park is removed from the agenda!

As with any other significant development, the Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
Document: Revised LDP, p.75
Policy: H15.01
Summary: Delete Celtic Way Gypsy and Traveller site.

**Soundness Test**
All the tests of soundness.

**Representation**

I strongly oppose the proposed site at Celtic Way for a Gypsy Traveller / Transit Site. I live at the back of Celtic Horizon, very close to the proposed site and if the proposals were to go ahead, we will incur noise 24 hours a day. We have had gypsy camps set up temporarily in the near vicinity before and it has caused nothing but trouble. The gypsies leave their animals roam free and leave their rubbish lying around. Celtic Way has many very important businesses contributing to employment and wealth in Wales. The businesses strongly oppose traveller site and many have said they will not invest further in the local area if the proposed site was to go ahead. In terms of safety for the travellers, it is not a good site, as it is directly opposite Quinn Radiators with lorries moving constantly. The value of the houses in Celtic Horizon and the surrounding area will depreciate drastically if the site was to go ahead. Are the Council going to compensate the local community? We have built a lovely community around Celtic Horizon and this will be ruined if the Traveller Site goes ahead.

**Council Response**

As with any other significant development, the Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council's duty and enabling the Police to use its powers to move on other unauthorised encampments.

The site will be designed as a transit site and therefore only used by Gypsy/Travellers on a temporary basis as they pass through Newport. It is expected that the Gypsy/Travellers will use their vehicles to move around and there will be limited activity in terms of moving around the area on foot. Therefore the fact there is poor street lighting and a lack of pavement is not considered to be a significant concern. Increased street lighting could be provided if Members consider it to be essential.

The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
### Representation Details

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**Document:** Revised LDP, p.75  
**Policy:** General G&T  
**Summary:** No Policy with regards to the management of nuisance and fly tipping associated with Gypsy and Traveller sites.

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<td>10</td>
<td>Soundness Test</td>
</tr>
<tr>
<td>11</td>
<td>Representation</td>
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<tr>
<td></td>
<td>There is no sound, logical or rational statement within the plan on how the authority will manage nuisance and fly tipping in the areas of the permanent and transit sites. If we look at the coast road from Newport to Cardiff and the permanent sites located there. I would as the authority to clearly explain to all those who have raised concerns what they would do differently to the neighbouring authority to ENSURE that this does not occur in Newport and the surrounding areas?</td>
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<td>12</td>
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<td>P2/C4/CE3 - Agreed policy and process to be implemented to prevent nuisance and fly tipping.</td>
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<th>Tick-box reply</th>
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<td>13</td>
<td>Council Response</td>
<td>Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.</td>
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**Representation Details**

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**Document:** Revised LDP, p.65

**Policy:** H01

**Map:** Proposals West: Proposals Plan - West

**Summary:** New housing site at Queens Hill School site.

---

**Item Question** | **Representation Text**
---|---
5 5 | Add a new site

---

**Candidate Site Name**

Queenshill

---

**Candidate Site Reference**

1232 C1

---

10 10 | Soundness Test

CE1, CE2
The 4.25ha Queens Hill School site (QHS) stands at the top of Queen’s Hill Newport and is surrounded by housing on all sides. It is in an elevated position within the urban area, with the River Usk to the east, J26 of the M4 to the north and the railway station and city centre within walking to the south-east. For many years the site was the location of the Newport High School which later became the Queens Hill Comprehensive School until its closure some years ago. Since the closure and demolition of the main comprehensive school the educational use has diminished, with many of the buildings having been demolished and the land lying vacant. The land was declared surplus to requirements in 2003.

There is still a small educational use on the site with the Newport Pupil Referral Unit (PRU) and the remaining buildings also house the school meals service which provides school meals across Newport. However, Newport Council has decided that a new secondary school will not be built on the site and recently confirmed that both the PRU and schools meals service will be relocated, leaving a large vacant brownfield site that is surplus to the Councils requirements. QHS is not covered by any national or local designation relating to flooding, nature conservation, landscape or historic matters and is not allocated in the Unitary Development Plan for any particular use. The objective of the UDP in relation to education provision in Newport was declared as being ‘to ensure that there is adequate educational provision to meet existing and future needs’. The site is simply identified as an Educational site as at the time of adoption of the UDP, despite being largely vacant, and declared surplus to Educational requirements.

The site is now a vacant, deteriorating site within the settlement boundary which requires regeneration in what is primarily an existing residential area. In this context a residential redevelopment of the site is considered acceptable in principle.

The 2012 Deposit LDP recognised that urban regeneration is a major issue for Newport and therefore proposed a sustainable development strategy, focusing on regeneration, seeking to maximise reuse of vacant, underused, derelict or previously developed, brownfield land. However, despite this the former school site was not identified for any proposed use in the 2012 deposit LDP and the 2013 version has not sought to address this issue either, leaving the site to be dealt with as a windfall site via a planning application.

The 2013 Deposit Draft recognises at paragraph 1.9 that redundant sites are a major issue and a major resource for Newport, declaring at paragraph 1.12 that ‘a sustainable development strategy is proposed, with a focus on regeneration, building on the culture and heritage of the city, seeking to maximise the use of previously developed, brownfield land.’

The 10 Corporate Objectives seek to ensure that all development is located in the most sustainable locations, using sustainable transport, minimising its impact on the environment, makes a positive contribution to local communities, their health and wellbeing and provides an adequate supply of housing land.

The LDP Strategic Policies develop the objectives and vision by applying them to a spatial strategy for the city, also seeking to concentrate development in sustainable locations on brownfield land within the settlement boundary and protecting the natural and built environment. This strategy (SP10) sets out a requirement for 10,350 and a provision for 11,622 dwellings over the plan period, which includes 12% for flexibility.

SP19 encourages residential development of vacant, underused sites within the urban area particularly where it will contribute to the ‘vitality, viability and quality of the environment of the city centre,’ such as a site near to the city centre like Queens Hill School site.

The Councils Vision, Corporate Objectives and Strategic Policies recognise that regeneration of vacant sites is a key means of achieving sustainable development. Apart from reusing resources, regeneration will help reduce car-based transport by providing a more compact form of development, with more journeys possible on foot, public transport or cycling. As well as reducing CO2 emissions, this will contribute to the healthy living agenda and where the sites are located near to the city centre, such as Queen Hill School site, it too will also benefit with more people having ready access to it, with increased consumer spending sustaining city centre shops.

Despite this QHS is not allocated within the Deposit LDP.

Evidence indicates that there is a significant need for new housing and the LDP seeks to deliver approximately 10,350 (by allocating 11,622) new homes over the Plan period, ensuring that there is an adequate supply of housing land in sustainable locations and proposing that between 402-843 houses are built each year. Included within the allocations are 2 former school sites, H1(39) former Bettws Comprehensive School (under construction) & H1(55) Woodland Site Ringland at Hartridge School, both of which are in locations on the periphery of the city, rather than within walking distance of the city centre.

This leaves QHS to be considered as a windfall site – against an estimation of 1,013 dwellings to be provided on such sites over the plan period (75 units per annum). However, windfall sites are large sites of more than 10 units that have not been identified within the Plan because they came forward unexpectedly for development over the Plan period. QHS will come as no surprise to anyone when it comes forward for development. It has been the subject of a screening opinion in 2007 and 2012 for proposed residential development and so is known to the LPA as a potential housing site. At a recent public consultation exercise there was considerable support for the reuse of the site. To ignore its allocation now, especially as there are other former education sites that are in less sustainable locations would appear illogical.

An SA is attached which has been completes using more recent information than the previous LPA SA. This concludes that the site is more sustainable than previously assessed. The main differences are:

1. Although there are important trees on the site, an arboricultural assessment has shown that they can be protected as part of any development.
2. A landscape appraisal has confirmed that there are no hedgerows on site.
3. A baseline ecology survey has confirmed that the land is of little or no ecological value so there will be no loss of ecological important open spaces or corridors.
4. There is no community use of this vacant former educational site.
Such an omission indicates a lack of coherence in the application of the LDPs strategic spatial strategy in conflict with tests CE1 & CE2.

QHS can provide development in a more sustainable location that supports the city centre strategy and is closer to the city centre and main transport interchanges than virtually any other allocated site, including H1(55) & H1(39). Allocation of QHS will deliver a range of benefits that include:

- The regeneration and certainty of use of a prominent Brownfield site;
- Improvement to congestion problems during school drop-off/pick-up;
- Improved vehicular access into the site;
- Delivery of a choice of new quality housing;
- Provide affordable housing to meet local needs either on site or elsewhere;
- Provide play space and other facilities for the use of the primary school;
- Increased permeability with opportunities for walking and cycling through the site;
- Visually enhance a degraded site that affects surrounding residential areas.

In terms of the overall numbers and flexibility, the site will only accommodate approximately 85 dwellings. This represents less than 1% of the overall provision (0.73%) and, if allocated, would only reduce the windfall allocation to 928 – a marginal reduction from 75 pa to 68 pa. The site exists and is available. It will come forward within the plan period and therefore will form part of the proposed supply, either as a windfall site or as an allocation. The fact that the site will come forward for development will not come as a surprise, which should mean that by the LPA’s own criteria, the site should be allocated.

As the site is a vacant brownfield site within the settlement boundary, with no real options for its re-use other than for residential, the allocation of the site will not add to the quantum of housing land available during the plan period. What it will do is add to the certainty for the future of the site, giving the landowners and developers increased confidence to invest in its future use. The LPA’s overall and windfall targets are ambitious and already include a backlog.

In order to increase the probability of achieving these targets, the LPA should allocate QHS under policy H1 among the list of ‘sites of 10 or more dwellings’ as a new allocation for residential development to reduce the windfall target to a more robust figure and add QHS to a bank of available sustainable realistic sites that will also increase the flexibility of the plan to respond to change.

12 Speaking at Public Examination

13 Council Response

The site at Queenshill School is known to the Council as it was submitted as a Candidate Site. However, until recently timescales for closure/adaptation of facilities of the site were not known as definite and as such it is considered that the site can be treated as a windfall site if the time arises when the current uses are no longer required.

The rate of windfall sites set out in the Plan is based on a review of the past trend of windfall supply which has been drastically cut to reflect the need for the Plan to remain flexible whilst concentrating growth on allocated housing sites and tight settlement boundaries. The windfall allowance is deemed appropriate to reflect the focus which the Plan sets for delivering housing in those areas that comply with the strategy. The Plan will be monitored as to the percentage of houses developed on allocated housing sites to ensure that the housing policies of the plan are being effectively implemented.

It is unnecessary to include this proposal in the Revised Deposit LDP because the plan already identifies sufficient land for residential development. A proposal of this nature — which, given the urban location, may be acceptable in principle — would have to be the subject of an application for planning permission. It is acknowledged this site would contribute towards the ‘windfall’ housing delivery.
Representation Details

by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M

Rep'n/Para/Policy     Representer                    Agent              Accession No Date Lodged Late?   Source Type Mode Status     Status Modified
3911.L1//H15.01 Horsburgh, Dr Samantha & Gordon 29/07/2013 C M

Document: Revised LDP, p.75
Policy: H15.01
Map: Proposals West: Proposals Plan - West
Summary: Delete Celtic Way Gypsy and Traveller transit site.

Item Question  Representation Text
11  I am writing to express our objection to the proposed Traveller transit site close to Celtic Horizon. We object to the site for many reasons, but mainly for economic reasons and the subsequent effects on the local community:

The impact on future investment in the local area by present companies and prospective businesses. At the recent meeting in Duffryn community centre, it became quite clear that companies such as Quinn Radiators will reconsider any future investment and development of sites close to Celtic Way if the proposed development goes ahead. This could greatly impact on the local area, affecting local employment and future prospects. It has already taken several years to attract companies and businesses that cover a wide range of industries (technology, manufacturing, financial services, restaurants, hotels) to move into the site previously used by LG / Phillips and into the Celtic Springs area although the area is well placed for transport links. Building the transit site will discourage future investment by both present companies and businesses / industries that might be attracted by the location and existing facilities.

There is the devaluation of local residents property and the prospect of discouraging families from moving into the local area. This will have a large impact on the community reversing the improvements that have occurred with the investment in new housing which has greatly raised the reputation of the local area, attracting families looking for work and a pleasant area to reside in. I would also imagine that the National Trust may not have taken on the prospect of managing Tredegar House before these improvements had taken place. Their stewardship of Tredegar House has helped to attract a larger number of visitors to the area and brought more investment into the community. The new housing has helped to attract businesses to locate close to the centre of Duffryn and in Celtic Springs.

Considering the well placed position of the local area to the M4 motorway and A48, one would think it would be sensible for the council to have policies that attract businesses, people and families into the local area to both live and work rather than discourage them.

The actual cost to the tax payer for building, maintaining these sites and ensuring that local residents property is not affected for a limited number of families that do not pay council tax. We do not see how in this era of austerity, the council can justify the cost of this project for a limited number of people, especially when local services are being cut back. If these funds are available, surely these should be used in projects that bring benefit to the whole community rather than a few transient families that do not contribute to the community.

We hope that you shall reconsider the location of the proposed site for the above reasons,

Best regards,

Item Question  Council Responses
13  Council Response

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.
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<tr>
<td>11</td>
<td>Representation</td>
<td>I am concerned about the future over development of the Langstone area. I am therefore proposing that the land that is situated to the north of the A48 and as far up to the Kemys Ridge, be revised and classed as 'Special Landscaped Area' in Langstone Village cease at Old Roman Road and from Old Roman Road, to the A48 be designated as 'Countryside'. Furthermore, I am also concerned regarding the future over development of the Langstone area. I would am therefore proposing that the land that is situated to the north of the A48 and as far up to the Kemys Ridge, be reviewed and classed as 'Special Landscaped Area'. The current proposals are that the 'Special Landscaped Area' in Langstone Village cease at Old Roman Road and from Old Roman Road, to the A48 be designated as 'Countryside'. I have attached the relevant form to reiterate the above comments. I trust that you will consider my comments as part of the examination process.</td>
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<tr>
<td>2</td>
<td>Soundness of LDP</td>
<td>Yes</td>
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Council Response

The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales’ guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.
Representation Details

Document: Revised LDP, p.75
Policy: General G&T

Summary: Support for the Revised LDP with particular reference to Gypsy and Traveller sites.

11  Representation
I previously wrote to you regarding the Newport LDP proposals that were outlined in the Autumn of 2012, with specific focus on the proposed Gypsy and Traveller sites.

Now that my views have been considered along with those of other residents of Newport, I am now writing to you to express my support of the actions that have been put forward within the revised Newport LDP. I believe what has been put forward within the revised LDP does offer the best course of action and way forward with regards to the Gypsy and Traveller sites.

13  Council Response
Support noted.
Furthermore, I am also concerned regarding the future over development of the Langstone area. I would therefore proposing that the land that is situated to the north of the A48 and as far up to the Kemys Ridge, be reviewed and classed as 'Special Landscaped Area'. The current proposals are that the 'Special Landscaped Area' in Langstone Village cease at Old Roman Road and from Old Roman Road, to the A48 be designated as 'Countryside'.

I have attached the relevant form to reiterate the above comments.

I trust that you will consider my comments as part of the examination process.

The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales' guidance.

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### Representation Details

- **Document:** Revised LDP, p.75  
  - **Policy:** General G&T  
  - **Summary:** Support the revised LDP.

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**Accession No:** 3913.L2//General  
**Agent:** Buchanan, Mr Robert  
**Accession No:** 26/07/2013  
**Late?** E  
**Type:** S  
**Status:** M  
**Status Modified:** No grouping
### Representation Details

**by:** (No grouping)  
**Filtered to show:** (all of) Stage=L; Status=M  
**Rep'n/Para/Policy**  
**Representor**

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**Document:** Revised LDP, p.81  
**Policy:** EM02.07  
**Summary:** Amend Policy EM2(vii) Crindau to allow retail development.

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**11**  
**11** Representation  
Whilst supporting the inclusion of Crindau as an area where regeneration schemes will be encouraged, we object to the omission of retail and suggest that Policy EM2 (vii) should be worded as follows:

'CRINDAU 10 HECTARES FOR B1, COMMERCIAL, RETAIL, AND LEISURE USES'.

In light of the above, it is recommended that Newport City Council should implement the above recommended change to wording of the Policy, and also allocate the land for A1 and A3 uses in future Focused Changes to the Plan and in a revised Development Brief which supports LDP policies.

See attached Covering Letter and Sustainability Appraisal.

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<td>To respond to points directly raised by the Inspector as by the time of the Examination there may be a planning application in preparation.</td>
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**13**  
**13** Council Response  
The Plan encourages a "City Centre first" approach. The Colliers Retail Study that has been commissioned has not identified any additional retail need in this part of the City. Therefore, it is not considered necessary or desirable to add 'retail' to this regeneration allocation.
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<td>The Garden Centre Group</td>
<td>Gregory Gray Associates</td>
<td>07/08/2013</td>
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<td>Additional material submitted - Please click here</td>
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Document: Revised LDP, p.65

Policy: H01

Summary: Allocate Castleton Garden Centre for residential/business/retail/leisure or tourism
Gregory Gray Associates is instructed to write on behalf of our client, The Garden Centre Group, owners of Castleton Garden Centre, to make representations in respect of the above consultation.

Our client owns Castleton Garden Centre, Newport Road, Castleton, CF3 2UQ, a 5.64 ha site located immediately to the north-east of the settlement of Castleton. It is located between the A48 and the A48(M) within land identified as a ‘Green Wedge’ in the Revised Deposit Local Development Plan.

Castleton Garden Centre comprises previously developed land containing approximately 5,600 sq.m of floorspace made up of a large retail shop, covered canopies and a plant display area together with extensive areas of hardstanding used for car parking and storage purposes. It offers a sustainable location, located on the edge of an existing village which is well served by public transport given its location on the Cardiff/Newport bus route.

A site plan accompanies this letter.

The garden centre is no longer in operation and our client is keen to explore alternative uses for this brownfield site. Given the site’s highly developed nature it is considered that an alternative use of the site could be accommodated within a building with a substantially reduced footprint to that existing. This would allow development to be concentrated in a more limited part of the site, allowing extensive landscaping and greatly improving the openness of the site and the contribution that it makes to the purpose of including the land within an identified ‘green wedge’.

Planning Policy for Wales (November 2012) states that the same presumption against inappropriate development that applies in the Green Belt should also apply in green wedges. Paras. 4.8.16 and 4.8.17 set out a limited range of exceptions to the definition of ‘inappropriate’ development and para 4.8.18 concludes that “Other forms of development would be inappropriate development unless they maintain the openness of the Green Belt or green wedge and do not conflict with the purpose of including land within it”.

Whilst the redevelopment of a brownfield site does not fall within one of the specified categories which define ‘appropriate’ development it is considered that, in the case of Castleton Garden Centre, the reduction in footprint and site coverage that could be achieved would ensure that a future redevelopment could be demonstrated to maintain and enhance the openness of the green wedge and not to conflict with the purposes of including land within it, such that its redevelopment should not be considered ‘inappropriate’ by virtue of para. 4.8.18.

Whilst, this could be demonstrated to the Council as part of any future planning application, it is requested that the Council consider the development potential of Castleton Garden Centre with a view to making it part of its planned provision over the Plan period.

Within this context it is considered that the site would be suitable to provide residential development, either comprising a care home or individual residential units, or for employment, food/non-food retail, leisure or tourism uses.

It is considered that the allocation of Castleton Garden Centre for alternative purposes would be consistent with the objectives of the Development Plan, most particularly Objective 1 which seeks 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 upon the environment and make a positive contribution to local communities’. The key way in which the Plan intends to achieve this objective is by focusing development on previously used, brownfield sites such as that belonging to our client.

In summary, the Council are requested to allocate Castleton Garden Centre for residential (either individual units or as a care home), retail, business, leisure or tourism purposes in the emerging Local Development Plan. The site provides an opportunity to provide new development in a sustainable manner by reusing a brownfield site which is well served by alternative means of transport and well located close to local centres of population. Given the highly developed nature of the site at present, any such scheme has the potential to secure a material increase in the site’s openness and without prejudice to the purposes of including it within the designated green wedge. As such it would fully accord with national planning policy.

Furthermore, it is requested that the Council consider the detailed comments made in respect of individual policies contained within the revised Deposit Local Development Plan as set out above. Should you require any clarification on the above matters, please do not hesitate to contact me.
The assessment of the site has concluded that the site is not suitable for allocation within the Plan. It is therefore not necessary for the site to be included within the housing chapter of the Plan. The site at the Former Garden Centre, Castleton is outside of the settlement boundary and located in an area allocated as Green Wedge and Countryside in the LDP. The Plan seeks to promote the reuse of Brownfield sites in preference to extensive use of Greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities. Part of the site is considered brownfield, and planning permission for a care home has been granted where the garden centre buildings stood. However it is considered appropriate that the Green Wedge and Countryside designations remain as bit part removal of isolated sites would undermine the purpose of those designations, namely the preservation of the open nature of the area.

The Garden Centre Group
Gregory Gray Associates
07/08/2013

**Summary:** Amend Policy SP1 to allow for the possibility of redeveloping previously developed sites within rural areas.

**Represented by:** The Garden Centre Group
**Represented by Agent:** Gregory Gray Associates
**Represented on:** 07/08/2013

Policy SP1 Sustainability states that proposals will "be required to make a positive contribution to sustainable development by concentrating development in sustainable locations on brownfield land within the settlement boundary....." (my underlining).

The Plan recognises that one of the key actions that can be taken to achieve sustainable development is to focus on reusing previously developed land. However nothing contained within national policy suggests that this desire to make best use of natural resources through the use of previously developed sites should be restricted to urban areas.

Policy SP1 is intended to provide an ‘over-arching framework that places sustainability at the heart of the Plan’. Should this be the case, it is essential that the policy allow for the sustainable development of rural brownfield sites. In the absence of adequate policy support for such development, rural brownfield sites would become sterilised leading to a loss of a valuable economic resource and likely to have a detrimental impact upon the character of the rural environment.

Accordingly, it is requested that Policy SP1 be revised to allow for the possibility of re-developing previously developed sites within the rural area which should then be assessed against the sustainability criteria set out within the policy.

**Council Response:**
No change to the Plan is considered necessary. Brownfield sites in rural locations will be considered on their merits on a case by case basis and against the policies of the Plan. The Plan seeks to focus development within the defined settlement boundary as these are considered to be more sustainable locations. This approach is consistent with the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.
### Representation Details

**by:** (No grouping)

**Filtered to show:** (all of) Stage=L; Status=M

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Summary: Support Policy

**Item Question** | **Representation Text**
---|---
11 | 11 | Representation

SP5 Countryside states (inter alia) that "housing development, rural diversification and rural enterprises, beyond the settlement boundary, will only be appropriate where they comply with national planning policy". Our client raises no objection to this policy since the redevelopment of Castleton Garden Centre for alternative purposes would be consistent with national policy on green wedges for the reasons set out already.

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**Item Question** | **Council Responses**
---|---
13 | 13 | Council Response

Support noted.

---

**Item Question** | **Representation Text**
---|---
11 | 11 | Representation

Our client also raises no objection to Policy SP7 Green Wedges which indicates that development which prejudices the open nature of the land will not be permitted within this designation. As stated, a redevelopment of Castleton Garden Centre as envisaged by my client would be demonstrated to have a beneficial impact upon the open nature of the green wedge in which the site is located.

---

**Item Question** | **Council Responses**
---|---
13 | 13 | Council Response

Support noted.
Representation Details

Document: Revised LDP, p.50
Policy: CE01
Summary: Expand policy to include further criteria

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<th>Question</th>
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<tr>
<td>11</td>
<td></td>
<td>It is requested that Policy CE1 Development in the Green Belt and Green Wedges be expanded to include a further criteria namely: “the redevelopment of previously developed sites where it is clearly demonstrated that the development would have a decreased impact on openness of the Green Belt or green wedge and would not conflict with the purposes of including land within it”. As currently worded, the policy does not allow for the possibility of redeveloping a previously developed site for an alternative purpose, where the development would maintain the openness of the Green Belt/green wedge and would not conflict with the purposes of including land within it. It is considered that the addition of such a criteria would accord with national policy guidance and the objectives of the Development Plan.</td>
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<tr>
<td>13</td>
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<td>It is not considered appropriate to adjust the wording to include reference to the ‘redevelopment of previously developed sites’ as the policy should be applied throughout the areas designated as Green Wedge. If there are specific characteristics of sites such as existing buildings then this should be considered on a site by site basis at the planning application stage.</td>
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Representation Details

by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M
Rep'n/Para/Policy Representor
Agent Accession No Date Lodged Late? Source Type Mode Status Status Modified
3916.L6//H01 The Garden Centre Group Gregory Gray Associates 07/08/2013 E O M

Additional material submitted

Document: Revised LDP, p.65
Policy: H01
Summary: Amend Policy to include site at Castleton Garden Centre

Item Question Representation Text

11 11 Representation

It is also requested that Policy H1 Housing Sites be amended to include Castleton Garden Centre as one of the identified housing allocations. It is considered that the site provides a suitable location for new residential development given its previously developed nature, proximity to an existing settlement, and good public transport links. The site could be made immediately available and there are no known constraints to its viable redevelopment. It is considered that the site would be particularly appropriate to provide specialist residential accommodation such as a care home and it is noted that its allocation for such purposes would be consistent with the Development Plan’s stated requirement of taking into account the needs of the elderly.

Item Question Council Responses

13 13 Council Response

The assessment of the site has concluded that the site is not suitable for allocation within the Plan. It is therefore not necessary for the site to be included within the housing chapter of the Plan. The site at the Former Garden Centre, Castleton is outside of the settlement boundary and located in an area allocated as Green Wedge and Countryside in the LDP. The Plan seeks to promote the reuse of Brownfield sites in preference to extensive use of Greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities. Part of the site is considered brownfield, and planning permission for a care home has been granted where the garden centre buildings stood. However it is considered appropriate that the Green Wedge and Countryside designations remain as bit part removal of isolated sites would undermine the purpose of those designations, namely the preservation of the open nature of the area.
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<tr>
<td>11</td>
<td>Representation</td>
<td>It is requested that Policies EM1 Employment Land Allocations or Policy EM2 Regeneration Sites be amended to include reference to Castleton Garden Centre. The site’s former use renders it suitable for new employment uses which could be achieved without detriment to the open character of the site or purposes for designating it as part of a green wedge.</td>
</tr>
<tr>
<td></td>
<td>Council Response</td>
<td>The Council has a sufficient amount of employment land allocated within the LDP and therefore this site will not be added as an employment allocation. This site has been assessed as part of the Alternative Sites Assessment. Please see the Alternative Sites Assessment for the Council's full conclusion.</td>
</tr>
<tr>
<td>11</td>
<td>Representation</td>
<td>Alternatively, it is requested that Policies EM1 Employment Land Allocations or Policy EM2 Regeneration Sites be amended to include reference to Castleton Garden Centre. The site’s former use renders it suitable for new employment uses which could be achieved without detriment to the open character of the site or purposes for designating it as part of a green wedge. Whilst it is recognised that the Plan identifies sufficient employment land to meet estimates of future need, the addition of our client’s site would broaden the choice of supply and would assist in the provision of rural employment which is essential to maintain the health and vibrancy of rural communities.</td>
</tr>
<tr>
<td></td>
<td>Council Response</td>
<td>The Council has a sufficient amount of employment land allocated within the LDP and therefore this site will not be added as an employment allocation. This site has been assessed as part of the Alternative Sites Assessment. Please see the Alternative Sites Assessment for the Council's full conclusion.</td>
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### Representation Details

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Document: Revised LDP, p.109  
Policy: CF08  
Summary: Support for policy

**Item Question**  
**Representation Text**

11  
Our client supports Policy CF8 Tourism which indicates that new tourism related development in the countryside will be permitted, particularly where regeneration objectives will be complemented.

**Item Question**  
**Council Responses**

13  
Support noted.

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Document: Revised LDP, p.110  
Policy: CF10  
Summary: Castleton Garden Centre to be added as commercial leisure development

**Item Question**  
**Representation Text**

11  
Finally, the Council is requested to consider Castleton Garden Centre’s potential to provide a commercial leisure development under the terms of Policy CF10. This policy identifies current pressure to locate such development on existing industrial or employment sites leading to concerns in terms of the potential cumulative impact on employment land. Our client’s site offers an opportunity to provide new leisure development, on a brownfield site, well served by public transport and without detriment to identified employment land supply.

**Item Question**  
**Council Responses**

13  
It is considered that development proposals for this site can be appropriately considered under the LDP policies as drafted, including policy CF10. It is not considered that this site requires special status in the LDP.
### Representation Details

**Document:** Revised LDP, p.75  
**Policy:** General G&T  
**Summary:** Supports the G&T allocations made in the Revised Deposit LDP.

<table>
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<tr>
<th>Item Question</th>
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| 11 | Having been made aware of the revisions to the above plan, and in particular reference to the location of the Gypsy and Traveller sites as set out in the plan.  
I would like to confirm that I accept and approve the revised Deposit Local Plan in this respect. |

<table>
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<tr>
<th>Item Question</th>
<th>Council Responses</th>
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<td>13</td>
<td>Support noted.</td>
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Here is an example of a representation text for a Gypsy and Traveller site issue in a Local Development Plan (LDP). The representation involves Richardson, Mr Leigh, who has accepted and approved the revised Deposit Local Plan in the context of Gypsy and Traveller site allocations.

**Accession No:** 26/07/2013  
**Date Lodged:** 26/07/2013  
**Status:** E  
**Type:** S  
**Mode:** M
Document: Revised LDP, p.22
Policy: SP08
Summary: Amend the SLA boundary north of Langstone.

Representation Details

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<td>Richardson, Mr Leigh</td>
<td></td>
<td>26/07/2013</td>
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Richardson, Mr Leigh

Item Question Representation Text

11

Importantly, further improvement could be made to the Plan in protecting Langstone Village from further major development, by adding the countryside north of A48 that is outside of the boundary settlement, up to and including Old Roman Road, and designate it as a "Special Landscaped Area".

Item Question Council Responses

13

Council Response

The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales' guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.
**Representation Details**

**by:** (No grouping)

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**Document:** Revised LDP, p.75

**Policy:** H15.01

**Summary:** Objection to proposed Gypsy and Traveller site at Celtic Way.

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<td>8 8</td>
<td>Candidate Site Name</td>
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<td></td>
<td>Land at Celtic Way, Imperial Park</td>
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<tr>
<td>10 10</td>
<td>Soundness Test</td>
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<td>C1, C2, C3, C4, CE1, CE2, CE3, CE4</td>
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I am writing on behalf of Target Group Ltd to object the proposal for a transit camp to be sited at land on Celtic Way, Dyffryn, Newport. Our business is a leading outsourcing and software provider to financial services companies and we have been based on Imperial Way for five years. Imperial Park comprises a variety of professional businesses based within a Tier 2 funded area.

We are aware that the business and residential communities have voiced their concerns and we ask that you add Target Group’s objections to your proposals. With the positioning of the proposed site our business reputation along with the whole business park may be affected.

There are many areas around Newport that would meet the criteria for a transit site, however we do not feel a leading technology business park is the right choice. The proposed site recommendation demonstrates an inconsistency with national and regional planning policy. The location will pose issues for the travelling community also due to a number of health and safety risks including frequent access of HGV and commercial vehicles, lack of pavements and poor street lighting to name a few.

We feel strongly that your proposal has a lack of sufficient detail including security and health and safety risk assessments. We urge you to reconsider your proposal for the good of the business park, residents and the travelling community.

We also support the letter written by Jones LangLasalle, dated 25th July 2013.
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<th>Question</th>
<th>Council Responses</th>
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<tr>
<td>13</td>
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<td>It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.</td>
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<td>The site will be designed as a transit site and therefore only used by Gypsy/Travellers on a temporary basis as they pass through Newport. It is expected that the Gypsy/Travellers will use their vehicles to move around and there will be limited activity in terms of moving around the area on foot. Therefore the fact there is poor street lighting and a lack of pavement is not considered to be a significant concern. Increased street lighting could be provided if Members consider it to be essential.</td>
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<td>The proposal is for a transit site providing temporary short-term accommodation, rather than a permanent place to live. In this context, the adjacent land uses to the Celtic Way site are not considered to be hazardous, however it is agreed that they are not suitable places for children to play. The indicative layout of the transit site will include green areas for play and therefore children will have onsite facilities.</td>
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<td>The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.</td>
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<td>Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.</td>
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The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.
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Document: Revised LDP, p.75
Policy: H15.01
Summary: Objection to Gypsy and Traveller Site proposed at Celtic Way.
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<td>11 11 Representation</td>
<td>Newport City Council Revised Deposit Local Development Plan: Proposed Gypsy / Traveller transit site – Celtic Way, Coedkernew</td>
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We write within the consultation period (due to expire today at 5pm) to object to the proposal for a Gypsy / Traveller transit site at Celtic Way, Coedkernew, Newport.

Our objections are as follows:

**Business**

One of the LDP's objectives is “to enable a diverse economy that meets the needs of the people of Newport and those of the wider South East Wales economic region”. We do not consider that locating the the Gypsy / Traveller transit site at Celtic Way delivers on this criteria and is in fact contradictory.

- In section 2.67 the LDP states that "the sites in west Newport are close to major arterial routes which make them well connected nationally, regionally and locally. Substantial development has already occurred in the area and that there are "business advantages in locating near to similar uses".
- In sections 6.5 and 6.6 of the LDP, it is noted that the area has potential for further commercial development. It should also be noted that the developments at Celtic Springs and Imperial Business Parks required compulsory purchases of land to acquire the full site for the LG Development, and the potential of the area should therefore be maximised. It is a Tier 2 Government funded area and attracts companies to Newport, bringing jobs and rate payers.
- Newport is an economically deprived area and we are fortunate to have attracted some major employers to the city. It seems prudent to maximise the commercial value of this area to bring further jobs and revenue to the city, particularly when Welsh Government has suggested there is a buyer interested in the site, and when there are other options available for the transit site.
- We are also gravely concerned that the existing local businesses (eg. Quinn Radiators) have openly suggested that they would have to seriously consider plans for future expansion and potentially even consider relocating if the site is located at Celtic Way. This would result in a loss of employment, causing a significant impact on the local economy. If Newport is to remain "Open for Business" it is critical that NCC attract and retain high quality businesses and employers to the city.

**Health and Safety**

The ‘Designing Gypsy and Traveller Sites Good Practice Guide’ (Welsh Assembly Government, 2008) describes the responsibilities authorities have in creating sites. We do not believe that the criteria described in Sections 3.1/8.4/3.10 have been adequately addressed for the following reasons:

- Twenty four access to existing commercial premises of staff and commercial vehicles.
- Lack of pavements resulting in access being dependent via a busy main road (40mph speed limit causing a danger to children in particular)
- Adjacent to busy dual carriageways and main highways (A48, A48M)
- Close proximity to open water, reens and drainage ditches posing a hazard to young children.
- The immediate surroundings are an SSSI and flood plain. This would put portable accommodation at particular risk of flooding, especially if travellers without local knowledge were to expand their site on the adjacent area (albeit unauthorised).
- Risk to health and safety from locating the site in a permanent 'construction site' (the LDP also proposes development of the business park and surrounding infrastructure such as the SDR up to 2026). Residents in portable accommodation would be particularly vulnerable to dust, noise pollution and at risk of road traffic accidents due to changing temporary traffic management systems.
- The Gwent Police Report ‘Gypsy and Traveller Site: Site Appraisal and Scrutiny Review (page 46) states that "this site would be appropriate for children unless they are confined within the boundary of the site, due to the volume of traffic and heavy goods vehicles in the area". However, it would be impossible to protect children from inadvertently wandering into a number of the hazardous areas we have referred to above.

**Conclusion**

We believe that the objections we have raised are valid and highlight that the proposed site at Celtic Way does not comply with Welsh Government good practice. We therefore do not support the location of the transit site at Celtic Way.

Furthermore, we strongly object to the deadline of 5pm 26th July for a public consultation for the proposals which lack sufficient details including management, security, health and safety assessments and cost-benefit analysis. As tax payers, mindful of spend at a time of austerity, we believe that a robust assessment of the costs for each proposed site should be made available to assist stakeholders in making sound, evidence based decisions.

12/02/2014
We also object to the consultation deadline due to inadequate stakeholder engagement. We live in a development adjacent to the site but have not received any communication from NCC regarding this. Consultation best practice (eg. Cabinet Office principles) is that all stakeholders should be sufficiently and appropriately communicated with. We have not received a letter or any other communication from the council and were only made aware of this via a group on a social media website. I would imagine that most residents within the city do not regularly peruse the planning pages of the NCC website, and many would simply not have easy access to it eg. Elderly, disabled.

We want to ensure that Newport remains open for business and provides everyone with access to a safe place to live, jobs and services. In closing, we do not believe that the site at Celtic Way would deliver this for anyone, including the travellers themselves.

Council Response

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.

The site will be designed as a transit site and therefore only used by Gypsy/Travellers on a temporary basis as they pass through Newport. It is expected that the Gypsy/Travellers will use their vehicles to move around and there will be limited activity in terms of moving around the area on foot. Therefore the fact there is poor street lighting and a lack of pavement is not considered to be a significant concern. Increased street lighting could be provided if Members consider it to be essential.

The proposal is for a transit site providing temporary short-term accommodation, rather than a permanent place to live. In this context, the adjacent land uses to the Celtic Way site are not considered to be hazardous, however it is agreed that they are not suitable places for children to play. The indicative layout of the transit site will include green areas for play and therefore children will have onsite facilities.

Development alongside water can enhance the setting of an area. Safety around lakes is something that children from all cultures need to be aware of and is not considered an obstacle to development.

The transit site will be clearly defined, maintained and managed. Any unauthorised expansion onto the SSSI is likely to be dealt with swiftly with Police action, who will be able to move on unauthorised encampments once the Council has a transit site. The site is not located within a floodplain.

It is considered that the 6 week consultation process was sound. The proposals and consultation opportunities were advertised in the South Wales Argus, along with Newport Matters which is delivered to every home in Newport. All Community Councils were informed of the consultation, including Coedkernew. In addition, the consultation was advertised on the Council’s website and thousands of letters were sent out to stakeholders and members of the public. It is acknowledged that there was a fault with Newport City Council’s website during the weekend of 20/21 July. As a result, the Council took the reasonable step of extended the consultation for a further weekend.

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
### Representation Details

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<td>26/07/2013</td>
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**Document:** Revised LDP, p.75  
**Policy:** H15.02  
**Summary:** Support use of Ringland Allotments as an alternative to site at Celtic Way.

#### Item Question  
**Representation Text**

We believe that one of two alternative sites would be preferable, both in terms of reducing the strain on tax payers/services and in ensuring we continue to attract high quality businesses to the city.

The site at Ringland Allotments is already owned by NCC and would therefore not incur any acquisition costs. The site is on the main identified transit route and there would be reduced costs in providing services such as waste collection, mains service provision etc as both sites would be situated in the same location.

#### Item Question  
**Council Responses**

Noted. However, it should be noted that the Former Allotment site is approximately 1,600 metres from the proposed Hartridge Farm residential site.
The site at A449 is another option, which was identified by Travellers as an "excellent transit site" in the site appraisal and scrutiny review, and one which would not encourage prolonged stays (a criteria for the temporary sites). We believe that issues raised by NCC regarding the speed of traffic on the A449 could be easily addressed by introducing variable speed limits which is already a strategy used to manage traffic for major events. Mains services are already in place at this location and we would urge NCC to revisit the criteria used for dismissing this site, in order to ensure that a cost-benefit analysis is properly conducted.

Both these locations benefit from the availability of schools provision in their immediate area, while at Celtic Way all schools in a three mile radius are full. The provision of education is a regulatory and moral right for traveller children, and to place them in an area where they cannot easily access education does not seem to support this.
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Document: Revised LDP, p. 76
Policy: H16
Summary: Objections to Hartridge Farm Road and Ringland Allotments
I would like to object to the proposals for both sites for the following reasons:

1. The residents of the Ringland ward are concerned about the impact of such a large addition of residents to the estate. Many of the resources in the Ringland ward are stretched to a maximum as it is – adding potentially 250 more people to the mix will put even more pressure on the services and amenities of the ward.

2. I have huge concerns regarding the levels of anti-social behaviour surrounding the site. In police reports this area had the highest concentration of ASB of any of the shortlisted sites. My concern is that placing the gypsy and traveller families on this large, exposed site will leave the families vulnerable to anti-social behaviour and potentially fatal acts of violence from an already well-pronounced element of anti-gypsy residents. The proposed site is easily accessible from the SDR allowing the scene to be left and attacked swiftly. I would prefer to see three small sites where the families can live peacefully.

3. The site flagrantly flouts the Welsh Government guidelines in terms of size. The guidelines propose no more than 20 pitches per site in exceptional circumstances. Here we are looking at a projection of 43 pitches – 50% more than the guidelines recommend.

4. Residents on Ringland Circle have presented me with evidence of flooding which occurs when the flood plain (i.e. the proposed site at Hartridge Farm Road) is at capacity. It would seem that flooding potential has not been taken properly into consideration, thus making this proposal unsound.

5. The projected size of this site – as many as 129 caravans based on two static and one tourer per pitch – will overshadow the neighbouring hamlet of Hartridge Farm Road significantly. It will also interfere with the business of the RSPCA due to the potential of animals being disturbed.

6. The road which will serve the site is already grossly inadequate and unfit for purpose. At school pick up and drop off times the road is busy and overcrowded and could not accommodate a further 80 vehicles using it (two parking spaces are to be allocated per pitch). It would seem to me that this would further increase potential for accidents and fatalities – especially for the small children that will reside on the site.

7. No consideration has been given to the housing of animals on the site. While the three families for whom the site is intended currently do not possess horses, we are all aware of what an important part of the gypsy culture horses are, and indeed within the last few weeks one of the families has had a donkey tethered to the site at which they currently reside for sale. Horses and ponies are an important element of the gypsy culture and I feel the proposals included within the LDP entirely overlook this. The position close to the SDR is inappropriate in this circumstance – a wondering horse, donkey or pony could cause serious issues.

8. I feel, as a Councillor, that the residents in the immediate vicinity weren’t given adequate consultation – this applies to the businesses (the Road Safety Centre and RSPCA), the immediately neighbouring schools (Llanwern High and Ysgol Cymraeg Casnewydd) and the neighbours to the site. Although a wider (although misleading) consultation went out regarding the site that was initially labelled the Former Road Safety Centre, it is my feeling that the immediate neighbours should have been consulted on to the same degree as the gypsy families.

9. The initial consultation from which this site was selected was entirely misleading. Councillors were asked to select from a list of sites which included the Former Road Safety Centre. The Road Safety Centre is indeed not ‘former’ and is still well used. This was the site that they chose, however, it is not the site that has been selected into the LDP. The site selected into the LDP has previously been discounted due to flooding issues and this isn’t the site that the Scrutiny team assessed as appropriate.

10. The Ringland Allotments site is still listed as a statutory allotment. Since being taken from the residents no provision for replacement allotments within the vicinity of the Ringland or Llanwern wards has been made, and while there are vacancies across the city it is the Council’s duty to provide allotments within a close proximity to residents – and indeed there are residents wishing to take up an allotment on this site. Their requests, to date, have largely been ignored.

11. One of the families for whom this site is intended has lived at their current location for more than forty years. In that time they have integrated with their community and they live harmoniously. As a councillor it is correct that after more than forty years we are dictating their move to somewhere that will not allow them to continue their lives as they have previously?

12. The selection of the Hartridge Farm Road site, being the most expensive of the proposed residential sites, is undeliverable due to financial constraints put on the council. Surely it is our responsibility to add much-needed traveller sites to the LDP that are actually deliverable. Even discounting the land asset value and just considering the development costs makes this site the most expensive and the least economical. The traveller families need a realistic option to their housing need and this isn’t it.

There is a list of 220 potential sites. As highlighted, none are perfect, but I strongly believe that in terms of a residential site, the Hartridge Farm Road site is wrong due to its proposed size and the many flaws highlighted above. One of the gypsy families has suggested that the former Speedway site would be desirable, while another has expressed that they would like to stay on the site they have lived at for more than forty years. Therefore, I would like to proposed these alternative sites.

The Ringland Allotments site is a back-up site, however, the pylons on the site and its flooding potential would suggest to be that it would be wholly unsuitable either for residential or transit purposes.

I hope that my comments will be carefully considered and wish to meet with the inspector when he inspects the plan.

12/02/2014
### Newport City Council Local Development Plan

**Representation Details**

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**Item Question**  Council Responses

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12/02/2014

Page 1367 of 1581
It is acknowledged that the size of the Hartridge Farm Road site is larger than Welsh Government guidance suggests, however this will avoid the need to split any of the individual families, which is an important factor for the families themselves. The size is sufficient to accommodate all 3 families, which would meet Newport's residential need for Gypsy/Traveller provision. The proposed layout would use screening to effectively create 3 independent sites within the curtilage of the whole site. The site would also be screened from the road and nearby residential properties. It is not expected that the population of the site will be 250 people. However, it should be noted that this site was allocated in the previous Deposit LDP for residential development which would have had a far higher population. No objections were raised to that proposal on the basis of the impact on local amenities. It is considered that local amenities are able to accommodate the proposed use and population, in particular taking into account that the three families already live in Newport and have children in local schools etc.

The Council has liaised with the Police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the Police if any incidents of crime that relate to the site are reported. Work will also be undertaken with the Police and schools to promote community cohesion.

There are no flood risk issues at Hartridge Farm Road providing a buffer is left at the southern edge of the site adjacent to the railway. This is allowed for in the indicative site layout plan.

The draft indicative layout of this site shows that a significant buffer could be provided between the RSPCA Centre and the pitches, and/or a noise attenuation fence erected.

It is acknowledged that the Hartridge Farm Road site will require improvements to the access road including the provision of a length of pavement. This will be agreed as part of a planning application and is not considered insurmountable.

The Council has a duty to provide accommodation for the gypsy/traveller population. We do not have a duty to provide land for horses. The site will be owned and managed by the Council and there is no intention to allow the occupants to keep horses on site.

Prior to making its final recommendation, both the Scrutiny Committee and Cabinet were fully aware that the Hartridge Farm Road Site is still in use by the Road Safety Centre (see paragraph 2.3.3 of the 24 April 2013 Scrutiny Committee report). This information was also before Council on 04 June 2013 before it approved the Revised Deposit LDP for consultation. The sites were clearly identified on maps prior to the public consultation undertaken by the Scrutiny Committee, and therefore it is not considered that the reference to ‘Former’ Road Safety Centre was misleading.

At the start of the Scrutiny Committee review the Hartridge Farm Road site was considered as three individual land parcels. However, these three sites were combined prior to the Scrutiny Committee public consultation on the 11 preferred sites. The Hartridge Farm Road site as identified in the Revised LDP is the same area considered by Scrutiny Committee and is the same area that was subject to public consultation in September 2012.

Consultation surrounding the Scrutiny Committee process was extensive and well publicised in the local press as well as by the Council. Over 7000 replies were received. Although neighbouring residents were not directly contacted, all ward Councillors and Community Councils were directly notified. It should be noted that this is an addition to the statutory consultation on the LDP. Following inclusion of the Scrutiny Committee sites in the Revised LDP, further high profile consultation took place via the local media and the Council. The 7000+ people that took part in the Scrutiny Committee consultation were notified of the outcome and the opportunity to get involved in the LDP consultation. In addition, the 2000+ contacts already on the LDP database were notified. Presentations on the proposals were also provided at numerous well-attended community meetings throughout the City.

It is correct that one of the families has resided at a site for many years, however the site has no utilities such as electricity or gas and the family has therefore requested to be moved to a serviced site.

The Council is aware of the financial implications to its budget and considers the site to be deliverable. In terms of site delivery costs, while it is correct that the Hartridge Farm Road site is the most expensive single site to deliver, even excluding the potential land valuation, it must be remembered that this site meets all of the identified residential need. If Hartridge Farm Road were not allocated, multiple smaller sites would be needed. An accurate cost comparison therefore needs to consider the total site provision required to meet the identified need. This information was set out in section 2 of the Part 2 report to Full Council dated 04 June 2013. Comparing the different site delivery options that fully meet the identified need, Hartridge Farm Road is in fact the cheapest site delivery option when deleting the land valuation. This site is already owned by the Council so the land valuation represents a potential land sale receipt were the site sold to a house builder, rather than actual capital funding that the Council must find to buy the land.

With regards to the Ringland allotments site, the allotments are not registered as statutory allotments and have not been used for such a use for many years. Alternative allotment provision can be investigated if it is demonstrated there is insufficient allotment provision across Newport as a whole. There are not considered to be any significant risks associated with the pylons or flood risk.
Alternative gypsy/traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

3921.L2//H16
Corten, Cllr Emma  
Document: Revised LDP, p.76
Policy: H16
Summary: Proposing alternative gypsy/traveller sites - Former Speedway Site

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3921.L3//H16
Corten, Cllr Emma  
Document: p.76
Policy: H16
Summary: Proposing alternative site - Monksditch, off Broad Street Common

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12/02/2014
I cannot understand how this could be considered in the middle of an area which the council, together with the Welsh Government have actively marketed as a ‘hi-tech’ business park. I find it unthinkable that the Celtic Springs area could compete with areas at the former Llanwern site, Magor, or even Bristol and Cardiff in attracting new companies to the city, if they were to go ahead. Anything which puts this area, which is key to attracting companies who can provide well paid, technical employment to this area is perverse in my opinion. It also would seem to affect the proposed Duffryn Link Road, and it has also put at risk the proposed Coedkernew ‘Parkway’ station. Both these things are absolutely key to regeneration the west of Newport, which seems to be being left behind in terms of leisure and retail facilities. The area itself could be enhanced relatively cheaply to provide a countryside resource for both west Newport residents and also the coastal communities, Marshfield and St Mellons. (Example - The coast path).

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments. There are many policies within the Plan which protect and improve the environment and greenspaces of Newport. This area is within a wider employment allocation and so would not be allocated for countryside or recreation uses.

It is not envisaged that the proposed site will impact on the deliverability of the proposed Duffryn Link Road or Coedkernew Railway station. Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
Newport City Council Local Development Plan

Representation Details
by: (No grouping)
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Document: Revised LDP, p.75
Policy: H15.01
Summary: G&T site at Celtic Way should be deleted from the Plan.

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The plan does not meet the consistency tests: C1 and C2; and coherence and effectiveness tests: CE1, CE2, CE3 and CE4.
On behalf of our client, Mitchells and Butlers, we write to object to the proposed allocation in the Revised Deposit LDP 2013 of a Travellers transit site at Celtic Way (site H15(i)) which adjoins an established employment area and employment land allocation. Mitchells and Butlers Retail Limited owns the Dragon Fly public house adjoining employment allocation EM1(iii) both of which are north of the A449 but which forms part of broader employment-focused growth area in Newport.

However, notwithstanding the investigations and reports undertaken including Scrutiny Committee review, the proposed site at H15(i) is inappropriate and should not be allocated for the following key reasons:

1. First, and for clarification, it is noted that the Council’s 2012 consultation exercise on 11 possible sites (including Land at Celtic Way) for the emerging LDP presents a plan (attached) identifying the proposed transit site edged red. This does not reflect the H15(i) allocation presented on the emerging LDP Proposals Plan as the latter excludes land from the eastern edge of the roundabout spur. If the LDP’s proposals plan is incorrect then it would suggest that in being the only point of access to H15(i) it also serves that purpose for the residual land to the west of ‘South Lake Drive’ suggesting that this wider land might also be given over as a gypsy and traveller site in time as any future access to this residual land would be through the transit site. It is reasonable at this time for clarification to be provided on this matter as it could affect the type and form of future development in the area including on and off-site services and mitigation measures for H15(i).

2. Furthermore and having regard to 1. above and other matters, the proposed site’s selection does not reflect the guidance highlighted by the Council in informing the site allocation process nor does it respond positively to the Council’s desire to support growth in the economy.

There is a requirement under Circular 30/2007: Planning for Gypsy and Traveller Caravan Sites, for Local Planning Authorities to demonstrate that there is a realistic likelihood that strategic sites allocated in LDP’s will be made available for that purpose. In publishing a Revised Deposit LDP the Council must be content that it is sound. However, there appears to be no clear justification for the allocation of site H15(i). The land allocation adjoins (and effectively forms a part of) an important and strategic business and general industrial area. The adjoining employment area ‘Duffryn’ extends to some 65 ha and is described at paragraph 6.6 of the LDP as a ‘prestigious site’ providing land for heavy and light industrial uses. It is an area which complements the adjoining built area generally to the north of the allocation and also, the further growth area of EM1(iii) Celtic Springs which reinforces the Council’s approach to encouraging economic development uses to this wider area of western Newport. It is not an area suited to the proposed use under Policy H15.

3. The Assembly’s Good Practice Guide In Designating Gypsy Traveller Sites In Wales provides clear advice on the location of such provision. This appears to have been largely ignored. The importance given to site location is explicit. Paragraph 3.2.2 states that “local authorities should avoid locating sites next to or near hazards—such as…industrial sites”. This is reinforced at paragraph 3.2.5 which states “sites should not be considered if they are near … industrial locations and other hazardous locations”. In identifying the allocation site there appears to have been little consideration given to this particular guidance. There is no coherence in this approach; its weighting and balancing against other matters and therefore the allocation of this site under H15(i) is not justified.

4. Land at H15(i) was previously considered a fall back location for new facilities as, initially the A449 depot site was to be designated as a transit site though it was subsequently discounted due to there being no safe means of access. It does, however, appear to be a concern that the current land allocation at H15(i) will be within an area of significant HGV and other large vehicle movements around the site and as such will require mitigation measures to address this and other effects. Again, this reflects a lack of coherence and H15(i) cannot be simply taken as the next alternative.

What this also means is that the development of the employment allocation; and planning applications made at the employment areas to the north of the allocation such as changes of use or for additional plant and machinery will need to have regard to the effect on H15(i) in being a non-conforming use in a wider industrial area. This will have an effect on the flexibility and attractiveness of existing premises to future occupiers and investors.

5. In being a transit site it is noted that that the emerging LDP provides little in the way of detail about the length of stay and mitigation measures proposed to reflect the type of site, its implementation and management/monitoring. This is essential given: that it is a land allocation; the plan should provide clarity; and the plan’s statement as to the importance of the neighbouring areas to existing businesses and their growth and its attractiveness to inward investors – all looking for guidance and certainty through the planning system.

Conclusion and changes proposed

To conclude allocation H15(i) is not a suitable site to provide gypsy and traveller accommodation. The site identification process requires reassessment and, if required, a new allocation made away from this broad employment area identified as EM1(i) and EM(iii).
The points raised in this representation are fundamental to the delivery of a sound and effective development plan. The location of the proposed gypsy and traveller site at H15(i) raises wider issues within the plan and warrants discussion at the Public Examination.

**Item Question**: Soundness of LDP

**Council Responses**

The extent of the site is set out on the Local Development Plan Proposals Plan. The detail of the access to the site will be confirmed at the planning application stage. There is no intention to expand the site to the west. It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however, an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.

The proposal is for a transit site providing temporary short-term accommodation, rather than a permanent place to live. In this context, the adjacent land uses to the Celtic Way site are not considered to be hazardous, however it is agreed that they are not suitable places for children to play. The indicative layout of the transit site will include green areas for play and therefore children will have onsite facilities.

The site will be designed as a transit site and therefore only used by Gypsy/Travellers on a temporary basis as they pass through Newport. It is expected that the Gypsy/Travellers will use their vehicles to move around and there will be limited activity in terms of moving around the area on foot. Therefore the fact there is poor street lighting and a lack of pavement is not considered to be a significant concern. Increased street lighting could be provided if Members consider it to be essential.

The site is being managed by the Council, arrangements of the management of the site will be established by the Council well in advance of the sites opening.

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
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Document: Revised LDP, p.75
Policy: General G&T
Summary: Support the LDP with particular reference to Gypsy and Traveller sites.

**Item Question**

**Representation Text**

11  Representation

Having been made aware of the revisions to the above plan and in particular reference to the location of the Gypsy and Traveller sites as set out in the plan, is acceptable, and I accept and approve the Revised Deposit Local Development Plan.

**Item Question**

**Council Responses**

13  Council Response

Support noted.
**Representation Details**

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**Document:** Revised LDP, p.22  
**Policy:** SP08  
**Summary:** Propose amendment to boundary of SLA in Langstone.

**Item Question**  
**Representation Text**

However, further improvement could be made to the Plan in protecting Langstone Village from further major development by adding the Countryside north of the A48 that is outside of the boundary settlement, up to and including Old Roman Road, and designate it as a 'Special Landscape Area'.

**Item Question**  
**Council Responses**

The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales’ guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.
### Representation Details

**Document:** Revised LDP, p.75  
**Policy:** General G&T  
**Summary:** Support the Plan with particular reference to the location of Gypsy and Traveller sites.

<table>
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Representation Details

Document: Revised LDP, p.22
Policy: SP08
Summary: Propose amendment to Special Landscape Area in Langstone.

Item Question Representation Text

However, further improvement could be made to the Plan in protecting Langstone Village from further major development by adding the Countryside north of the A48 that is outside of the boundary settlement, up to and including Old Roman Road, and designate it as a 'Special Landscaped Area'.

Item Question Council Responses

The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales' guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.
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Document: Revised LDP, p.76
Policy: H16.02
Summary: Object to proposed Gypsy and Traveller site at former Ringland Allotments

The full consultation comments are available to view against representation reference 3896.L1
Health Issues and Pylons - No concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

Location - The site is adjacent to the settlement boundary and considered to be a reasonably sustainable location. More remote locations that are further outside of the settlement boundary have poorer access to amenities and place more of an emphasis on car travel, therefore deemed to be more unsustainable.

Land Presentation - Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development. The results of these surveys have confirmed that some ground re-profiling works will be required at the Former Ringland Allotments. This work will add to the development costs but is not considered to be insurmountable.

Access – Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

Existing Use – There are no allotments on the site. Alternative allotment provision can be investigated if it is demonstrated there is insufficient allotment provision across Newport as a whole.

Aspect – A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

Highway Safety - Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

Environmental – The Council Strategy is a Brownfield led strategy and preference is given to sites which are previously developed. A number of greenfield sites are within the Plan as they are considered appropriate and well located for development. This is why this site is included.

Amenities - It is agreed that the locking of the underpass is something that needs to be avoided in order to ensure access to local amenities.

Flooding – Flood risk at this site is not considered to be a significant risk.

Financial Implications – The Council is aware of the potential financial implications of going ahead with the site. Gallagher Estates have planning permission for their major development in close proximity to the site and although they have submitted representations of concern, they are currently continuing to submit information to enable them to discharge planning conditions and get on site and build.

Privacy and Noise - A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

Potential danger caused by animals - The Council has a duty to provide accommodation for the Gypsy/Traveller population. We do not have a duty to provide land for horses. The site will be owned by the Council and there is no intention to allow the occupants to keep horses on site.

The Process – The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.

Crime/Perception of Crime – As with any other significant development, the Council has liaised with the police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the police if any incidents of crime that relate to the site are reported.

Alternative Sites – Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

House Prices – The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.
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Document: Revised LDP, p.76
Policy: H16.01
Summary: Object to proposed Gypsy and Traveller site at Hartridge Farm Road
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We the undersigned wish to register our objection to the Gypsy and Traveller site proposed at Hartridge Farm Road.

Our reasons are summarised as follows:

Size – The proposed size of the site is unimaginable and is far outside the Welsh Assembly Government’s Guidelines and Good Practice. The site is intended to have up to 43 pitches with each pitch having up to 3 to 4 caravans. This will make this site not just the biggest in Britain but the biggest in Europe. Such a development will not be in the interest of residents or travellers alike wherever that area is located and will not be in the interest of Newport itself. Further a site of this scale will not encourage the integration of travellers within the community but is likely to have the opposite effect. Therefore the proposal itself is inconceivable.

Layout – The proposed layout is contrary to the good faith of the Welsh Government’s Guidelines and Good Practice. To take a single large site and split it into three sites to house all three families flagrantly contravenes the guidelines and will dominate the immediate small community. It is also unfair to the travellers as they do not want communal sites as it will promote conflict within the families as well as likely to infringe the human rights of both the travellers and the immediate communities alike.

Location – This site is not suitable and other sites are more suitable. The location of the site is regarded by the Travellers themselves as unsuitable as they have justifiable concerns being too close to Llanwern High School with regards to conflict. Their preference is to be more remote. Further considerations should be given other sites such as the former speedway site, and similar, that have previously been nominated by both travellers and non-travellers alike, and to those sites identified in the existing Local Development Plan as being more favourable. The revised version of the plan does not give due consideration to the alternative sites available, nor does it provide sustainable reasons for rejecting those previously preferred.

In the revised draft plan, the Council have favoured sites to the east of Newport as the preferred locations. Travellers have expressed no such preference and are more concerned that selection should be based on the suitability of each individual site.

Current use – The Road Safety Centre is the focal point of contact for all road safety education, training and publicity service in Newport and surrounding area. To lose this facility would be a great loss to Newport as some courses in particular develop an understanding of behaviour and attitude and build confidence in the students (especially those of low attainment) themselves and many go on to a career in motor maintenance and the like from the experience and knowledge they have gained. Further, the Centre is within walking distance for the Llanwern High School pupils.

Proximity to Sewage Pumping Station – The site is located within a close proximity to a sewage pumping station. There may be health implications linked to the airborne particles produced by these stations.

Access – The site has restricted access along a lane adjacent to two schools. The schools attract a tremendous amount of traffic at peak times while Hartridge Farm Road alongside the houses there are no footpaths, no street lighting and the road narrows to just 15 feet. The road leading up to the site is in poor condition and barely suits its current needs. This would need extensive and costly refurbishment. The Policy Review Group has already identified and recorded vehicle access issues for the triangular site but is now choosing to ignore it.

Llanwern High School – Because of parents’ perception of traveller sites, rightly or wrongly, it would undermine the Council’s strategy of improving education in the east of the city. (Prior to the building of the new High School parents were reluctant to send their children to the old Hartridge School, choosing St Julian’s, Caerleon, Caldicot or Chepstow Schools instead). The remarkable transformation of the new building and the look, attitude and pride of the pupils has changed that. However, all the good work put into the new school could be undermined and the impressive new Llanwern High School could become a very expensive, underused, facility.

Ysgol Gymraeg Caesnewydd – Again because of parents’ perception of traveller sites, rightly or wrongly, parents are likely to reconsider their choice of school for their children. This would undermine further the already fragile financial position of the school thus deterring future needed investment.

Financial Matters – The Council’s financial strategy will also be undermined because the proposed site is designated for building and the capital receipts used to offset the cost of the new Llanwern School and so reduce the Council’s debt.

RSPCA Centre – For years the RSPCA Centre and the residents have co-existed amicably. The dogs are rarely noisy, unless they are disturbed. They would be constantly disturbed if there was a traveller site next door. This would result in stressed animals and residents, including the travellers themselves. RSPCA staff and volunteers daily exercise the dogs but say they could not risk walking their nervous, abandoned charges passed a travellers site.
Land Presentation – The topography of this site, as it stands, is not totally suitable for the proposed use. Again the Policy Review Group has already identified and recorded that the topography of the triangular site is unsuitable but is now choosing to ignore it.

Amenities – Access to local amenities is via an underpass to Ringland. This underpass has in the past been often locked due to safety and anti-social behaviour issues. Such issues are likely to be considerably exacerbated by the proposed development thus putting travellers and their families at risk. The Travellers themselves have also expressed concerns.

Noise – As the site is adjacent the busy main railway line there will be noise problems that will be a particular issue for caravans. A noise attenuation fence is proposed here but due to the level of noise will be of little effect.

Potential danger caused by animals – it is well know that many traveller families keep a stock of ponies and horses now or in the future. There are many well documented examples of these animals escaping their confines. An animal of this nature running out onto the Railway, SDR or found wandering through the adjacent Schools or neighbouring Ringland Estate or Llanwern Village will undoubtedly cause issues and even cost lives in the case of the Railway or SDR.

Aspect – The site will be highly visible from the busy mainline railway and would potentially create a poor image of Newport.

The Process – The Scrutiny Report dated 29th October, 2012 and, consequently, accepted by Cabinet on 12th November 2012 is inconsistent, biased, is incomplete in its assessment made and offers no analytical evidence of the preferences made for the selection of travellers sites as claimed. The Policy Review Group recommendations display a lack of understanding of the Travellers needs which was further reinforced by a member of the Policy Review Group during Full Council on 4th June 2013 displaying a serious lack of understanding of what constitutes a Travellers Site thus casting further, serious, doubt on the integrity of the aforementioned report they produced.

In conclusion this site is neither suitable for the provision of traveller sites nor is such a massive site, the biggest in Europe, in the interest of Newport. Further the integrity of the Policy Review Group’s Report, recommendations and conclusions are questionable for the reasons given. Moreover, there are no sound reasons for removing the sites previously proposed.
It is acknowledged that the size of the Hartridge Farm Road site is larger than Welsh Government guidance suggests, however this will avoid the need to split any of the individual families, which is an important factor for the families themselves. The size is sufficient to accommodate all 3 families, which would meet Newport’s residential need for Gypsy/Traveller provision. The proposed layout would use screening to effectively create 3 independent sites within the curtilage of the whole site. The site would also be screened from the road and nearby residential properties.

The site is within the settlement boundary and considered to be a sustainable location. Remote locations outside of the settlement boundary have poorer access to amenities and place more of an emphasis of car travel, therefore deemed to be more unsustainable. Site design can ensure it is well screened from the nearby RSPCA Centre and Llanwern High School.

The Road Safety Centre at the site would need to be relocated. The Council will assist with the relocation as best it can. This would be the case for any proposed use of the site.

With regards to the proximity to Sewage Pumping Station, no concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

It is acknowledged that the Hartridge Farm Road site will require improvements to the access road including the provision of a length of pavement. This will be agreed as part of a planning application and is not considered insurmountable.

The site will be well screened and should not impact on Llanwern High School or Ysgol Gymraeg Caesnewydd. Perception of Gypsy/Travellers at the Schools is something that the Council will need to address through interaction with the Head Teacher and Governors.

The Council is aware of the financial implications to its budget.

The draft indicative layout of this site shows that a significant buffer could be provided between the RSPCA Centre and the pitches.

Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development. Ground re-profiling works will be required at Hartridge Farm Road and the work will add to the development costs, but is not considered insurmountable.

It is agreed that the locking of the underpass is something that needs to be avoided in order to ensure access to local amenities. The site is also within a short walk from Newport Retail Park.

A noise assessment has been undertaken for Hartridge Farm Road. It is proposed that a 1.8m high noise attenuation fence is constructed adjacent to the RSPCA Centre, alongside the mainline railway and between the SDR and north-eastern part of the site.

The Council has a duty to provide accommodation for the gypsy/traveller population. We do not have a duty to provide land for horses. The site will be owned and managed by the Council and there is no intention to allow the occupants to keep horses on site.

A noise attenuation fence will be constructed alongside the mainline railway and the area will be well screened.

The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.
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Document: Revised LDP, p.75
Policy: H15.02
Summary: Object to proposed Gypsy and Traveller site at former Ringland Allotment site.

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**Item Question**  
**Representation Text**
I the undersigned wish to register our objection to the Gypsy and Traveller site proposed at the Former Ringland Allotments.

My reasons are summarised as follows:

Council guidelines – Part of the original 220 site survey quoted that this site was unsuitable due to there being “Pylons onsite and unsuitable access”, this hasn’t changed and remains a major issue. This is one of the main reasons the travellers themselves do not want to occupy this site.

Health issues related to pylons – There are numerous well documented papers relating to the health consequences of living near to electricity pylons. As study of childhood cancers recorded between 1963 and 1995 in England and Wales revealed that there is an increase in risk of children contracting leukaemia of 69% if they live within 200m of a power line and 23% if they live within 600m of a power line.

Location – The Council have favoured sites to the east of Newport as the preferred location. Travellers have expressed no such preference as to the location and are more concerned as to establishing a selection on suitability not location.

Land presentation – This site is not on level ground. The site is on a gradient unsuitable for siting caravans.

Access – Access to this would be shared with the proposed 1100 houses of Gallagher development which would increase traffic many fold on what is effectively a country lane. The turning in and out of the site by vehicles would be problematic given the location of the land and the fact that the road turns directly off from the 50mph limit SDR.

The Council has previously identified this land in part for the provision of a roundabout which would then create an access to the proposed site directly off or close to that roundabout. Such a situation at other possible sites has been condemned by both the Police and Highway Authorities.

Existing use – The allotment site is still a Statutory Allotment site and is not surplus to the requirement of the residents.

Aspect – The site is highly visible from the A48 so would potentially create a very poor image of Newport as this is one the major routes into the city. The site would afford no privacy for families living there.

Safety – The A48 is a very busy major route into Newport and has a 50mph speed limit and the regular movement of heavy good vehicles. Caravans and trailers would severely worsen the road safety situation.

Environmental – Council guidelines dictate that when selecting sites priority should be given to Brown field. This area is an undeveloped Greenfield site which is outside current development boundaries and currently provides a green wedge.

Amenities – Access to local amenities is via an underpass to Dawson Close in Ringland. This underpass has previously had to be locked on a regular basis due to safety and antisocial behaviour issues. Such issues are likely to be considerable exacerbated by the proposed development. The access to the underpass is also often affected by flooding during periods of heavy rain.

Flooding – The A48 is often affected by flooding due to run off of surface water from the site and this would be exacerbated by the proposed development. Pooling water on a main access route with a 50mph speed limit creates a considerable safety hazard.

Financial Implications – The development of adjacent land for housing by Gallagher Estates would be very unlikely to go ahead if a Gypsy and Traveller site were provided on this land. This would be a loss to the City of amongst other things the payment of the 106 agreement.

Privacy – Due to the closeness of the SDR and the openness of the site there would be privacy issues.

Noise – Due to the closeness of the SDR there would be a noise issue.
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**Potential danger caused by animals** – it is well known that many traveller families keep a stock of ponies and horses. There are also many well documented examples of these animals escaping their confines. An animal of this nature running out onto the SDR or found wandering though the neighbouring Ringland estate will undoubtedly cause issues and even cost lives in the case of the SDR.

The Process – The Scrutiny Report dated 29th October, 2012 and, consequently, accepted by Cabinet on 12th November 2012 is inconsistent, biased, is incomplete in its assessments made and offers no analytical evidence of the preferences made for the selection of travellers sites as claimed. The Policy Review Group recommendations display a lack of understanding of the Travellers needs which was further reinforced by a member of the Policy Review Group during Full Council on 4th June 2013 displaying a serious lack of understanding of what constitutes a Travellers Site thus casting further, serious, doubt on the integrity of the aforementioned report they produced.

In conclusion this site is neither suitable for the provision of traveller site. Further the integrity of the Policy Review Group’s Report, recommendations and conclusions are questionable for the reasons given. Moreover, there are no sound reasons for removing the sites previously proposed.

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### Item Question  Council Responses

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Document: Revised LDP, p.76

Policy: H16.01

Summary: Objection to proposed Gypsy and Traveller site at Hartridge Farm Road
My reasons are summarised as follows:

Size – The proposed size of the site is unimaginable and is far outside the Welsh Assembly Government’s Guidelines and Good Practice. The site is intended to have up to 43 pitched with each pitch having up to 3 to 4 caravans. This will make this site not just the biggest in Britain but the biggest in Europe. Such a development will not be in the interest of Newport itself. Further a site of this scale will not encourage the integration of travellers within the community but is likely to have the opposite effect. Therefore the proposal itself is inconceivable.

Layout – The proposed layout is contrary to the good faith of the Welsh Assembly Government’s Guidelines and Good Practice. To take a single large site and split it into three sites to house all three families flagrantly contravenes the guidelines and will dominate the immediate small community. It is also unfair to the travellers as they do not want communal sites as it will promote conflict within the families as well as likely to infringe the human rights of both the travellers and the immediate communities alike.

Location – This site is not suitable and other sites are more suitable. The location of the site is regarded by the Travellers themselves as unsuitable as they have justifiable concerns being too close to Llanwern High School with regard to conflict. Their preference is to be more remote. Further consideration should be given other sites such as the former speedway site, and similar, that have previously been nominated by both travellers and non-travellers alike. and to those sites identified in the existing Local Development Plan as being more favourable. The revised version of the plan does not give due consideration to the alternative sites available, nor does it provide sustainable reasons for rejecting those previously preferred.

In the revised draft plan, the Council have favoured sites to the east of Newport as the preferred locations. Travellers have expressed no such preference and are more concerned that selections should be based on the suitability of each individual site.

Current use – The Road Safety Centre is the focal point of contact for all road safety education, training and publicity service in Newport and surrounding area. To lose this facility would be a great loss to Newport as some courses in particular develop an understanding of behaviour and attitude and build confidence in the students especially those of low attainment themselves and many go on to a career in motor maintenance and the like from the experience and knowledge they have gained. Further, the Centre is within walking distance for the Llanwern High School pupils.

Proximity to Sewage Pumping Station – This site is located within a close proximity to a sewage pumping station. There may be health implications linked to the airborne particles produced by these stations.

Access – This site has restricted access along a lane adjacent to two schools. The schools attract a tremendous amount of traffic at peak times while Hartridge Farm Road alongside the houses there are no footpaths, no street lighting and the road narrows to just 15 feet. The road leading up to the site is in poor condition and barely suits its current needs. This would need extensive and costly refurbishment. The Policy Review Group has already identified and recorded vehicle access issues for the triangular site but is now choosing to ignore it.

Llanwern High School – Because of parents’ perception of traveller sites, rightly or wrongly, it would undermine the Council’s strategy of improving education in the east of the city. (Prior to the building of the new High School parents were reluctant to send their children to the old Hartridge School, choosing St Julian’s, Caerleon, Caldicot or Chepstow Schools instead). The remarkable transformation of the new building and the look, attitude and pride of the pupils has changed that. However, all the good work put into the new school could be undermined and the impressive new Llanwern High School could become a very expensive, underused, facility.

Ysgol Gymraeg Casnewydd – Again because of parents’ perception of traveller sites, rightly or wrongly, parents are likely to reconsider their choice of school for their children. This would undermine further the already fragile financial position of the school thus detracting future needed investment.

Financial Matters – The Council’s financial strategy will also be undermined because the proposed site is designated for building and the capital receipts used to offset the cost of the new Llanwern School and so reduce the Council’s debt.

RSPCA Centre – For years the RSPCA Centre and the residents have co-existed amicably. The dogs are rarely noisy, unless they are disturbed. They would be constantly disturbed if there was a traveller site next door. This would result in stressed animals and residents, including the travellers themselves. RSPCA staff and volunteers daily exercise the dogs but say they could not risk walking the nervous, abandoned charges passed a traveller site.

Land Presentation – The topography of this site, as it stands, is not totally suitable for the proposed use. Again the Policy Review Group has already identified and recorded that the topography of the triangular site is unsuitable but is now choosing to ignore it.
Amenities – Access to local amenities is via an underpass to Ringland. This underpass has in the past been often locked due to safety and antisocial behaviour issues. Such issues are likely to be considerably exacerbated by the proposed development thus putting travellers and their families at risk. The Travellers themselves have also expressed concerns.

Noise – As the site is adjacent the busy main railway line there will be noise problems that will be a particular issue for caravans. A noise attenuation fence is proposed here but due to the level of noise will be of little effect.

Potential danger caused by animals – it is well know that many traveller families may keep a stock of ponies and horses now or in the future. There are many well documented examples of these animals escaping their confines. An animal of this nature running out onto the Railway, SDR or found wandering through the adjacent Schools or neighbouring Ringland Estate or Llanwern Village will undoubtedly cause issues and even cost lives in the case of the Railway or SDR.

Aspect – The site will be highly visible from the busy mainline railway and would potentially create a poor image of Newport.

The Process – The Scrutiny Report dated 29th October, 2012 and, consequently, accepted by Cabinet on 12th November 2012 is inconsistent, biased, is incomplete in its assessments made and offers no analytical evidence of the preferences made for the selection of travellers sites as claimed. The Policy Review Group recommendations display a lack of understanding of the Travellers needs which was further reinforced by a member of the Policy Review Group during Full Council on 4th June 2013 displaying a serious lack of understanding of what constitutes a Travellers Site thus casting further, serious, doubt on the integrity of the aforementioned report they produced.

In conclusion this site is neither suitable for the provision of traveller sites is such a massive site, the biggest in Europe, in the interest of Newport. Further the integrity of the Policy Review Group’s Report, recommendations and conclusions are questionable for the reasons given. Moreover, there are no sound reasons for removing the sites previously proposed.
Council Response

It is acknowledged that the size of the Hartridge Farm Road site is larger than Welsh Government guidance suggests, however this will avoid the need to split any of the individual families, which is an important factor for the families themselves. The size is sufficient to accommodate all 3 families, which would meet Newport’s residential need for Gypsy/Traveller provision. The proposed layout would use screening to effectively create 3 independent sites within the curtilage of the whole site. The site would also be screened from the road and nearby residential properties.

The site is within the settlement boundary and considered to be a sustainable location. Remote locations outside of the settlement boundary have poorer access to amenities and place more of an emphasis of car travel, therefore deemed to be more unsustainable. Site design can ensure it is well screened from the nearby RSPCA Centre and Llanwern High School.

The Road Safety Centre at the site would need to be relocated. The Council will assist with the relocation as best it can. This would be the case for any proposed use of the site.

With regards to the proximity to Sewage Pumping Station, no concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

It is acknowledged that the Hartridge Farm Road site will require improvements to the access road including the provision of a length of pavement. This will be agreed as part of a planning application and is not considered insurmountable.

The site will be well screened and should not impact on Llanwern High School and Ysgol Gymraeg Casnewydd. Perception of Gypsy/Travellers at the Schools is something that the Council will need to address through interaction with the Head Teacher and Governors.

The Council is aware of the financial implications to its budget.

The draft indicative layout of this site shows that a significant buffer could be provided between the RSPCA Centre and the pitches.

Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development. Ground re-profiling works will be required at Hartridge Farm Road and the work will add to the development costs, but is not considered insurmountable.

It is agreed that the locking of the underpass is something that needs to be avoided in order to ensure access to local amenities. The site is also within a short walk from Newport Retail Park.

A noise assessment has been undertaken for Hartridge Farm Road. It is proposed that a 1.8m high noise attenuation fence is constructed adjacent to the RSPCA Centre, alongside the mainline railway and between the SDR and north-eastern part of the site.

The Council has a duty to provide accommodation for the gypsy/traveller population. We do not have a duty to provide land for horses. The site will be owned and managed by the Council and there is no intention to allow the occupants to keep horses on site.

A noise attenuation fence will be constructed alongside the mainline railway and the area will be well screened.

The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.
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Document: Revised LDP, p.76
Policy: H16.02
Summary: Objection to proposed Gypsy and Traveller site at Former Ringland Allotments.
I the undersigned wish to register my objection to the Gypsy and Traveller site proposed at Hartridge Farm Road and Ringland Allotments.

My reasons are summarised as follows:

Size – The proposed size of the site is unimaginable and is far outside the Welsh Assembly Government’s Guidelines and Good Practice. The site is intended to have up to 43 pitches with each pitch having up to 3 to 4 caravans. This will make this site not just the biggest in Britain but the biggest in Europe. Such a development will not be in the interest of Newport itself. Further a site of this scale will not encourage the integration of travellers within the community but is likely to have the opposite effect. Therefore the proposal itself is inconceivable.

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In the revised draft plan, the Council have favoured sites to the east of Newport as the preferred locations. Travellers have expressed no such preference and are more concerned that selections should be based on the suitability of each individual site.

Current use – The Road Safety Centre is the focal point of contact for all road safety education, training and publicity service in Newport and surrounding area. To lose this facility would be a great loss to Newport as some courses in particular develop an understanding of behaviour and attitude and build confidence in the students (especially those of low attainment) themselves and many go on to a career in motor maintenance and the like from the experience and knowledge they have gained. Further, the Centre is within walking distance for the Llanwern High School pupils.

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Access – This site has restricted access along a lane adjacent to two schools. The schools attract a tremendous amount of traffic at peak times while Hartridge Farm Road alongside the houses there are no footpaths, no street lighting and the road narrows to just 15 feet. The road leading up to the site is in poor condition and barely suits its current needs. This would need extensive and costly refurbishment. The Policy Review Group has already identified and recorded vehicle access issues for the triangular site but is now choosing to ignore it.

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Financial Matters – The Council’s financial strategy will also be undermined because the proposed site is designated for building and the capital receipts used to offset the cost of the new Llanwern...
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Issues raised in relation to Hartridge Farm Road Gypsy and Traveller Site are addressed in representation 3927.L3.

Ringland Allotments:

Health Issues and Pylons - No concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

Location - The site is adjacent to the settlement boundary and considered to be a reasonably sustainable location. More remote locations that are further outside of the settlement boundary have poorer access to amenities and place more of an emphasis on car travel, therefore deemed to be more unsustainable.

Land Presentation – Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development. The results of these surveys have confirmed that some ground re-profiling works will be required at the Former Ringland Allotments. This work will add to the development costs but is not considered to be insurmountable.

Access – Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

Existing Use – There are no allotments on the site. Alternative allotment provision can be investigated if it is demonstrated there is insufficient allotment provision across Newport as a whole.

Aspect – A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

Highway Safety - Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

Environmental – The Council Strategy is a Brownfield led strategy and preference is given to sites which are previously developed. A number of greenfield sites are within the Plan as they are considered appropriate and well located for development. This is why this site is included.

Amenities - It is agreed that the locking of the underpass is something that needs to be avoided in order to ensure access to local amenities.

Flooding – Flood risk at this site is not considered to be a significant risk.

Financial Implications – The Council is aware of the potential financial implications of going ahead with the site. Gallagher Estates have planning permission for their major development in close proximity to the site and although they have submitted representations of concern, they are currently continuing to submit information to enable them to discharge planning conditions and get on site and build.

Privacy and Noise - A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

Potential danger caused by animals - The Council has a duty to provide accommodation for the Gypsy/Traveller population. We do not have a duty to provide land for horses. The site will be owned by the Council and there is no intention to allow the occupants to keep horses on site.

The Process – The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.

Crime/Perception of Crime – As with any other significant development, the Council has liaised with the police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the police if any incidents of crime that relate to the site are reported.

Alternative Sites – Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
House Prices – The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.
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Llanwern High School – Because of parents’ perception of traveller sites, rightly or wrongly, it would undermine the Council’s strategy of improving education in the east of the city. (Prior to the building of the new High School parents were reluctant to send their children to the old Hartridge School, choosing St Julian’s, Caerleon, Caldicot or Chepstow schools instead). The remarkable transformation of the new building and the look, attitude and pride of the pupils has changed that. However, all the good work put into the new school could be undermined and the impressive new Llanwern High School could become a very expensive, underused, facility.

Ysgol Gymraeg Casnewydd – Again because of parents’ perception of traveller sites, rightly or wrongly, parents are likely to reconsider their choice of school for their children. This would undermine further the already fragile financial position of the school thus deterring future needed investment.

Financial Matters – The Council’s financial strategy will also be undermined because the proposed site is designated for building and the capital receipts used to offset the cost of the new Llanwern
RSPCA Centre – For years the RSPCA Centre and the residents have co-existed amicably. The dogs are rarely noisy, unless they are disturbed. They would be constantly disturbed if there was a traveller site next door. This would result in stressed animals and residents, including the travellers themselves. RSPCA staff and volunteers daily exercise the dogs but say they could not risk walking their nervous, abandoned charges passed a traveller site.

Land Presentation – The topography of this site, as it stands, is not totally suitable for the proposed use. Again the Policy Review Group has already identified and recorded that the topography of the triangular site is unsuitable but is now choosing to ignore it.

Amenities – Access to local amenities is via an underpass to Ringland. This underpass has in the past been often locked due to safety and antisocial behaviour issues. Such issues are likely to be considerably exacerbated by the proposed development thus putting travellers and their families at risk. The Travellers themselves have also expressed concerns.

Noise – As the site is adjacent the busy main railway line there will be noise problems that will be a particular issue for caravans. A noise attenuation fence is proposed here but due to the level of noise will be of little effect.

Potential danger caused by animals – it is well know that many traveller families may keep a stock of ponies and horses now or in the future. There are many well documented examples of these animals escaping their confines. An animal of this nature running out onto the Railway, SDR or found wandering through the adjacent Schools or neighbouring Ringland Estate or Llanwen Village will undoubtedly cause issues and even cost lives in the case of the Railway or SDR.

Aspect – The site will be highly visible from the busy mainline railway and would potentially create a poor image of Newport.

The Process – The Scrutiny Report dated 29th October, 2012 and, consequently, accepted by Cabinet on 12th November 2012 is inconsistent, biased, is incomplete in its assessments made and offers no analytical evidence of the preferences made for the selection of travellers sites as claimed. The Policy Review Group recommendations display a lack of understanding of the Travellers needs which was further reinforced by a member of the Policy Review Group during Full Council on 4th June 2013 displaying a serious lack of understanding of what constitutes a Travellers Site thus casting further, serious, doubt on the integrity of the aforementioned report they produced.

In conclusion this site is neither suitable for the provision of traveller sites nor is such a massive site, the biggest in Europe, in the interest of Newport. Further the integrity of the Policy Review Group’s Report, recommendations and conclusions are questionable for the reasons given. Moreover, there are no sound reasons for removing the sites previously proposed.
Hartridge Farm Road:

Size and Layout – It is acknowledged that the size of the Hartridge Farm Road site is larger than Welsh Government guidance suggests, however this will avoid the need to split any of the individual families, which is an important factor for the families themselves. The size is sufficient to accommodate all 3 families, which would meet Newport’s residential need for Gypsy/Traveller provision. The proposed layout would use screening to effectively create 3 independent sites within the curtilage of the whole site. The site would also be screened from the road and nearby residential properties.

Location – The site is within the settlement boundary and considered to be a sustainable location. Remote locations outside of the settlement boundary have poorer access to amenities and place more of an emphasis of car travel, therefore deemed to be more unsustainable. Site design can ensure it is well screened from the nearby RSPCA Centre and Llanwern High School.

Current Use – The Road Safety Centre at the site would need to be relocated. The Council will assist with the relocation as best it can. This would be the case for any proposed use of the site.

Proximity to Sewage Pumping Station – No concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

Access – It is acknowledged that the Hartridge Farm Road site will require improvements to the access road including the provision of a length of pavement. This will be agreed as part of a planning application and is not considered insurmountable.

Llanwern High School – The site will be well screened and should not impact on Llanwern High School. Perception of Gypsy/Travellers at the School is something that the Council will need to address through interaction with the Head Teacher and Governors.

Ysgol Gymraeg Casnewydd - The site will be well screened and should not impact on Ysgol Gymraeg Casnewydd. Perception of Gypsy/Travellers at the School is something that the Council will need to address through interaction with the Head Teacher and Governors.

Financial Matters – The Council is aware of the financial implications to its budget.

RSPCA Centre – The draft indicative layout of this site shows that a significant buffer could be provided between the RSPCA Centre and the pitches.

Land Presentation – Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development. Ground re-profiling works will be required at Hartridge Farm Road and the work will add to the development costs, but is not considered insurmountable.

Amenities – It is agreed that the locking of the underpass is something that needs to be avoided in order to ensure access to local amenities. The site is also within a short walk from Newport Retail Park.

Noise – A noise assessment has been undertaken for Hartridge Farm Road. It is proposed that a 1.8m high noise attenuation fence is constructed adjacent to the RSPCA Centre, alongside the mainline railway and between the SDR and north-eastern part of the site.

Potential danger caused by animals – The Council has a duty to provide accommodation for the gypsy/traveller population. We do not have a duty to provide land for horses. The site will be owned and managed by the Council and there is no intention to allow the occupants to keep horses on site.

Aspect – A noise attenuation fence will be constructed alongside the mainline railway and the area will be well screened.

The Process – The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.

Flooding – There are no flood risk issues at Hartridge Farm Road providing a buffer is left at the southern edge of the site adjacent to the railway.
Crime/Perception of Crime – As with any other significant development, the Council has liaised with the police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the police if any incidents of crime that relate to the site are reported.

Alternative Sites – Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

Regional/Cross boundary issues - As part of the Fordham Assessment research, interviews were conducted with neighbouring residents in order to discuss and establish the impact of cross-boundary movements. The outcomes were factored into the conclusions and recommendations of the report.

The Council must provide sites to meet the need identified for families within its area that require accommodation. Sites should be allocated within the relevant Authority's area, not in a neighbouring Authority, in the same way as each Authority is required to meet its bricks and mortar housing needs within its own LDP.

There have been informal discussions with South East Wales Authorities about establishing a regional network of transit sites, however there is clear evidence that a transit site is needed within Newport. There is no report yet produced.

House Prices – The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.

Ringland Allotments:

Health Issues and Pylons - No concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

Location - The site is adjacent to the settlement boundary and considered to be a reasonably sustainable location. More remote locations that are further outside of the settlement boundary have poorer access to amenities and place more of an emphasis on car travel, therefore deemed to be more unsustainable.

Land Presentation – Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development. The results of these surveys have confirmed that some ground re-profiling works will be required at the Former Ringland Allotments. This work will add to the development costs but is not considered to be insurmountable.

Access – Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

Existing Use – There are no allotments on the site. Alternative allotment provision can be investigated if it is demonstrated there is insufficient allotment provision across Newport as a whole.

Aspect – A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

Highway Safety - Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

Environmental – The Council Strategy is a Brownfield led strategy and preference is given to sites which are previously developed. A number of greenfield sites are within the Plan as they are considered appropriate and well located for development. This is why this site is included.

Amenities - It is agreed that the locking of the underpass is something that needs to be avoided in order to ensure access to local amenities.

Flooding – Flood risk at this site is not considered to be a significant risk.

Financial Implications – The Council is aware of the potential financial implications of going ahead with the site. Gallagher Estates have planning permission for their major development in close proximity to the site and although they have submitted representations of concern, they are currently continuing to submit information to enable them to discharge planning conditions and get on site and build.
Privacy and Noise - A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

Potential danger caused by animals - The Council has a duty to provide accommodation for the Gypsy/Traveller population. We do not have a duty to provide land for horses. The site will be owned by the Council and there is no intention to allow the occupants to keep horses on site.

The Process – The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.

Crime/Perception of Crime – As with any other significant development, the Council has liaised with the police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the police if any incidents of crime that relate to the site are reported.

Alternative Sites – Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

House Prices – The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.
### Representation Details

**Document:** Revised LDP, p.76

**Policy:** H16.02

**Summary:** Object to proposed Gypsy and Traveller site at Former Ringland Allotments.

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I the undersigned wish to register our objection to the Gypsy and Traveller site proposed at the Former Ringland Allotments.

My reasons are summarised as follows:

Council guidelines - Part of the original 220 site survey quoted that this site was unsuitable due to there being "Pylons on site and unsuitable access", this hasn't changed and remains a major issue. This is one of the main reasons the travellers themselves do not want to occupy this site.

Health issues related to pylons - There are numerous well documented papers relating to the health consequences of living near to electricity pylons. A study of childhood cancers recorded between 1963 and 1995 in England and Wales revealed that there is an increase in risk of children contracting leukaemia of 69% if they live within 200m of a power line and 23% if they live within 600m of a power line.

Location - The Council have favoured sites to the east of Newport as the preferred location. Travellers have expressed no such preference as to the location and are more concerned as to establishing a selection on suitability not location.

Land presentation - This site is not on level ground. The site is on a gradient unsuitable for siting caravans.

Access - Access to this would shared with the proposed 1100 houses of Gallagher development which would increase traffic many fold on what is effectively a country lane. The turning in and out of the site by vehicles would be problematic given the location of the land the fact that the road turns directly off from the 50mph limit SDR.

The Council has previously identified this land in part for the provision of a roundabout which would then create an access to the proposed site directly off or close to that roundabout. Such situation at the other possible sites has been condemned by both the Police and Highway Authorities.

Existing use - The allotment site is still a Statutory Allotment site and is not surplus to the requirement of the residents.

Aspect - The site is highly visible from the A48 so would potentially create a very poor image of Newport as this is one of the major routes into the city. The site would afford no privacy for families living there.

Safety - The A48 is a very busy major route into Newport and has a 50mph speed limit and the regular movement of heavy goods vehicles. Caravans and trailers would severely worsen the road safety situation.

Environmental - Council guidelines dictate that when selecting sites priority should be given the Brown Field. This area is an undeveloped green field site which is outside current development boundaries and currently provides a green wedge.

Amenities - Access to local amenities is via underpass to Dawson Close in Ringland. This underpass has previously had to be locked on a regular basis due to safety and antisocial behaviour issues. Such issues are likely to be considerable exacerbated by the proposed development. The access to the underpass is also often affected by flooding during periods of heavy rain.

Flooding - The A48 is often affected by flooding due to run off of surface water from the site and this would be exacerbated by the proposed development. Pooling water on a main access route with a 50mph speed limit creates a considerable safety hazard.

Financial Implications - The development of adjacent land for housing by Gallagher Estates would be very unlikely to go ahead if a Gypsy and Traveller site were provided on this land. This would be a loss to the City of amongst other things the payment of the 106 agreement.

Privacy - Due to the closeness of the SDR and the openness of the site there would be privacy issues.

Noise - Due to the closeness of the SDR there would be a noise issue.
Potential danger caused by animals - it is well know that many traveller families keep a stock of ponies and horses. There are also many well documented examples of these animals escaping their confines. An animal of this nature running out onto the SDR of found wandering through the neighbouring Ringland Estate will undoubtedly cause issues and even cost lives in the cases of the SDR.

The process - the Scrutiny Report dated 29th October, 2012 and, consequently, accepted by Cabinet on 12th November 2012 is inconsistent, biased, is incomplete in its assessments made and offers no analytical evidence of the preferences made for the selection of travellers sites as claimed. The Policy Review Group recommendations display a lack of understanding of the Travellers needs which was further reinforced by a member of that Review Group, during the Full Council meeting dated 4 June 2013, displaying a serious lack of understanding of what constitutes a travellers site thus casting further, serious, doubt on the integrity of the aforementioned report they produced.

In conclusion this site is unsuitable for the provision of a traveller site. Further the integrity of the Policy Review Group's Report, recommendations and conclusions are questionable for the reasons given. Moreover, there are no sound, sustainable, reasons for removing the sites previously proposed.

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12/02/2014  Page 1408 of 1581
Ringland Allotments:

Health Issues and Pylons - No concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

Location - The site is adjacent to the settlement boundary and considered to be a reasonably sustainable location. More remote locations that are further outside of the settlement boundary have poorer access to amenities and place more of an emphasis on car travel, therefore deemed to be more unsustainable.

Land Presentation – Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development. The results of these surveys have confirmed that some ground re-profiling works will be required at the Former Ringland Allotments. This work will add to the development costs but is not considered to be insurmountable.

Access – Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

Existing Use – There are no allotments on the site. Alternative allotment provision can be investigated if it is demonstrated there is insufficient allotment provision across Newport as a whole.

Aspect – A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

Highway Safety - Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

Environmental – The Council Strategy is a Brownfield led strategy and preference is given to sites which are previously developed. A number of greenfield sites are within the Plan as they are considered appropriate and well located for development. This is why this site is included.

Amenities - It is agreed that the locking of the underpass is something that needs to be avoided in order to ensure access to local amenities.

Flooding – Flood risk at this site is not considered to be a significant risk.

Financial Implications – The Council is aware of the potential financial implications of going ahead with the site. Gallagher Estates have planning permission for their major development in close proximity to the site and although they have submitted representations of concern, they are currently continuing to submit information to enable them to discharge planning conditions and get on site and build.

Privacy and Noise - A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

Potential danger caused by animals - The Council has a duty to provide accommodation for the Gypsy/Traveller population. We do not have a duty to provide land for horses. The site will be owned by the Council and there is no intention to allow the occupants to keep horses on site.

The Process – The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.

Crime/Perception of Crime – As with any other significant development, the Council has liaised with the police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the police if any incidents of crime that relate to the site are reported.

Alternative Sites – Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

House Prices – The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well
managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.
3929.L1//H16.01  Radford, Mr Mark  27/07/2013

Document: Revised LDP, p.76
Policy: H16.01
Summary: Object to proposed Gypsy Site at Hartridge Farm Road and Former Ringland Allotments.
I, the undersigned, wish to register my objection to the Gypsy and Traveller site proposed at Hartridge Farm Road and Ringland Allotments.

My reasons are summarised as follows:

Size – The proposed size of the site is unimaginable and is far outside the Welsh Assembly Government's Guidelines and Good Practice. The site is intended to have up to 43 pitches with each pitch having up to 3 to 4 caravans. This will make this site not just the biggest in Britain but the biggest in Europe. Such a development will not be in the interest of Newport itself. Further a site of this scale will not encourage the integration of travellers within the community but is likely to have the opposite effect. Therefore the proposal itself is inconceivable.

Layout – The proposed layout is contrary to the good faith of the Welsh Assembly Government's Guidelines and Good Practice. To take a single large site and split it into three sites to house all three families flagrantly contravenes the guidelines and will dominate the immediate small community. It is also unfair to the travellers as they do not want communal sites as it will promote conflict within the families as well as likely to infringe the human rights of both the travellers and the immediate communities alike.

Location – This site is not suitable and other sites are more suitable. The location of the site is regarded by the Travellers themselves as unsuitable as they have justifiable concerns being too close to Llanwern High School with regard to conflict. Their preference is to be more remote. Further consideration should be given other sites such as the former speedway site, and similar, that have previously been nominated by both travellers and non-travellers alike, and to those sites identified in the existing Local Development Plan as being more favourable. The revised version of the plan does not give due consideration to the alternative sites available, nor does it provide sustainable reasons for rejecting those previously preferred.

In the revised draft plan, the Council have favoured sites to the east of Newport as the preferred locations. Travellers have expressed no such preference and are more concerned that selections should be based on the suitability of each individual site.

Current use – The Road Safety Centre is the focal point of contact for all road safety education, training and publicity service in Newport and surrounding area. To lose this facility would be a great loss to Newport as some courses in particular develop an understanding of behaviour and attitude and build confidence in the students (especially those of low attainment) themselves and many go on to a career in motor maintenance and the like from the experience and knowledge they have gained. Further, the Centre is within walking distance for the Llanwern High School pupils.

Proximity to Sewage Pumping Station – This site is located within a close proximity to a sewage pumping station. There may be health implications linked to the airborne particles produced by these stations.

Access – This site has restricted access along a lane adjacent to two schools. The schools attract a tremendous amount of traffic at peak times while Hartridge Farm Road alongside the houses there are no footpaths, no street lighting and the road narrows to just 15 feet. The road leading up to the site is in poor condition and barely suits its current needs. This would need extensive and costly refurbishment. The Policy Review Group has already identified and recorded vehicle access issues for the triangular site but is now choosing to ignore it.

Llanwern High School – Because of parents’ perception of traveller sites, rightly or wrongly, it would undermine the Council’s strategy of improving education in the east of the city. (Prior to the building of the new High School parents were reluctant to send their children to the old Hartridge School, choosing St Julian’s, Caerleon, Caldicot or Chepstow Schools instead). The remarkable transformation of the new building and the look, attitude and pride of the pupils has changed that. However, all the good work put into the new school could be undermined and the impressive new Llanwern High School could become a very expensive, underused, facility.

Ysgol Gymraeg Casnewydd – Again because of parents’ perception of traveller sites, rightly or wrongly, parents are likely to reconsider their choice of school for their children. This would undermine further the already fragile financial position of the school thus deterring future needed investment.

Financial Matters – The Council’s financial strategy will also be undermined because the proposed site is designated for building and the capital receipts used to offset the cost of the new Llanwern
School and so reduce the Council's debt.

RSPCA Centre – For years the RSPCA Centre and the residents have co-existed amicably. The dogs are rarely noisy, unless they are disturbed. They would be constantly disturbed if there was a traveller site next door. This would result in stressed animals and residents, including the travellers themselves. RSPCA staff and volunteers daily exercise the dogs but say they could not risk walking their nervous, abandoned charges passed a traveller site.

Land Presentation – The topography of this site, as it stands, is not totally suitable for the proposed use. Again the Policy Review Group has already identified and recorded that the topography of the triangular site is unsuitable but is now choosing to ignore it.

Amenities – Access to local amenities is via an underpass to Ringland. This underpass has in the past been often locked due to safety and antisocial behaviour issues. Such issues are likely to be considerably exacerbated by the proposed development thus putting travellers and their families at risk. The Travellers themselves have also expressed concerns.

Noise – As the site is adjacent the busy main railway line there will be noise problems that will be a particular issue for caravans. A noise attenuation fence is proposed here but due to the level of noise will be of little effect.

Potential danger caused by animals – it is well know that many traveller families may keep a stock of ponies and horses now or in the future. There are many well documented examples of these animals escaping their confines. An animal of this nature running out onto the Railway, SDR or found wandering through the adjacent Schools or neighbouring Ringland Estate or Llanwern Village will undoubtedly cause issues and even cost lives in the case of the Railway or SDR.

Aspect – The site will be highly visible from the busy mainline railway and would potentially create a poor image of Newport.

The Process – The Scrutiny Report dated 29th October, 2012 and, consequently, accepted by Cabinet on 12th November 2012 is inconsistent, biased, is incomplete in its assessments made and offers no analytical evidence of the preferences made for the selection of travellers sites as claimed. The Policy Review Group recommendations display a lack of understanding of the Travellers needs which was further reinforced by a member of the Policy Review Group during Full Council on 4th June 2013 displaying a serious lack of understanding of what constitutes a Travellers Site thus casting further, serious, doubt on the integrity of the aforementioned report they produced.

In conclusion this site is neither suitable for the provision of traveller sites nor is such a massive site, the biggest in Europe, in the interest of Newport. Further the integrity of the Policy Review Group's Report, recommendations and conclusions are questionable for the reasons given. Moreover, there are no sound reasons for removing the sites previously proposed.
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**Newport City Council Local Development Plan**

It is acknowledged that the size of the Hartridge Farm Road site is larger than Welsh Government guidance suggests, however this will avoid the need to split any of the individual families, which is an important factor for the families themselves. The size is sufficient to accommodate all 3 families, which would meet Newport’s residential need for Gypsy/Traveller provision. The proposed layout would use screening to effectively create 3 independent sites within the curtilage of the whole site. The site would also be screened from the road and nearby residential properties.

The site is within the settlement boundary and considered to be a sustainable location. Remote locations outside of the settlement boundary have poorer access to amenities and place more of an emphasis on car travel, therefore deemed to be more unsustainable. Site design can ensure it is well screened from the nearby RSPCA Centre and Llanwern High School.

The Road Safety Centre at the site would need to be relocated. The Council will assist with the relocation as best it can. This would be the case for any proposed use of the site. With regards to the proximity to Sewage Pumping Station, no concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

It is acknowledged that the Hartridge Farm Road site will require improvements to the access road including the provision of a length of pavement. This will be agreed as part of a planning application and is not considered insurmountable.

The site will be well screened and should not impact on Llanwern High School or Ysgol Gymraeg Casnewydd. Perception of Gypsy/Travellers at the Schools is something that the Council will need to address through interaction with the Head Teacher and Governors.

The Council is aware of the financial implications to its budget.

The draft indicative layout of this site shows that a significant buffer could be provided between the RSPCA Centre and the pitches.

Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development. Ground re-profiling works will be required at Hartridge Farm Road and the work will add to the development costs, but is not considered insurmountable.

It is agreed that the locking of the underpass is something that needs to be avoided in order to ensure access to local amenities. The site is also within a short walk from Newport Retail Park.

A noise assessment has been undertaken for Hartridge Farm Road. It is proposed that a 1.8m high noise attenuation fence is constructed adjacent to the RSPCA Centre, alongside the mainline railway and between the SDR and north-eastern part of the site.

The Council has a duty to provide accommodation for the gypsy/traveller population. We do not have a duty to provide land for horses. The site will be owned and managed by the Council and there is no intention to allow the occupants to keep horses on site.

A noise attenuation fence will be constructed alongside the mainline railway and the area will be well screened.

The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.
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Document: Revised LDP, p. 76
Policy: H16.02
Summary: Objection to proposed Gypsy and Traveller site at Former Ringland Allotments (see Rep 329.L1 for Hartridge Farm Response.)
I the undersigned wish to register my objection to the Gypsy and Traveller site proposed at Hartridge Farm Road and Ringland Allotments.

My reasons are summarised as follows:

Size – The proposed size of the site is unimaginable and is far outside the Welsh Assembly Government’s Guidelines and Good Practice. The site is intended to have up to 43 pitches with each pitch having up to 3 to 4 caravans. This will make this site not just the biggest in Britain by the biggest in Europe. Such a development will not be in the interest of Newport itself. Further a site of this scale will not encourage the integration of travellers within the community but is likely to have the opposite effect. Therefore the proposal itself is inconceivable.

Layout – The proposed layout is contrary to the good faith of the Welsh Assembly Government’s Guidelines and Good Practice. To take a single large site and split it into three sites to house all three families flagrantly contravenes the guidelines and will dominate the immediate small community. It is also unfair to the travellers as they do not want communal sites as it will promote conflict within the families as well as likely to infringe the human rights of all the travellers and the immediate communities alike.

Location – This site is not suitable and other sites are more suitable. The location of the site is regarded by the Travellers as unsuitable as they have justifiable concerns being too close to Llanwern High School with regard to conflict. Their preference is to be more remote. Further consideration should be given other sites such as the former speedway site, and similar, that have not been considered as the alternatives sites available, nor does it provide sustainable reasons for rejecting those previously preferred.

In the revised draft plan, the Council have favoured sites to the east of Newport as the preferred locations. Travellers have expressed no such preference and are more concerned that selections should be based on the suitability of each individual site.

Current use – The Road Safety Centre is the focal point of contact for all road safety education, training and publicity service in Newport and surrounding area. To lose this facility would be a great loss to Newport as some courses in particular develop an understanding of behaviour and attitude and build confidence in the students (especially those of low attainment) themselves and many go on to a career in motor maintenance and the like from the experience and knowledge they have gained. Further, the Centre is within walking distance for the Llanwern High School pupils.

Proximity to Sewage Pumping Station – This site is located within a close proximity to a sewage pumping station. There may be health implications linked to the airborne particles produced by these stations.

Access – This site has restricted access along a lane adjacent to two schools. The schools attract a tremendous amount of traffic at peak times while Hartridge Farm Road alongside the houses there are no footpaths, no street lighting and the road narrows to just 15 feet. The road leading up to the site is in poor condition and barely suits its current needs. This would need extensive and costly refurbishment. The Policy Review Group has already identified and recorded vehicle access issues for the triangular site but is now choosing to ignore it.

Llanwern High School – Because of parents’ perception of traveller sites, rightly or wrongly, it would undermine the Council’s strategy of improving education in the east of the city. (Prior to the building of the new High School parents were reluctant to send their children to the old Hartridge School, choosing St Julian’s, Caerleon, Caldicot or Chepstow Schools instead). The remarkable transformation of the new building and the look, attitude and pride of the pupils has changed that. However, all the good work put into the new school could be undermined and the impressive new Llanwern High School could become a very expensive, underused, facility.

Ysgol Gymraeg Casnewydd – Again because of parents’ perception of traveller sites, rightly or wrongly, parents are likely to reconsider their choice of school for their children. This would undermine further the already fragile financial position of the school thus deterring future needed investment.

Financial Matters – The Council’s financial strategy will also be undermined because the proposed site is designated for building and the capital receipts used to offset the cost of the new Llanwern...
School and to reduce the Council’s debt. 

RSPCA Centre – For years the RSPCA Centre and the residents have co-existed amicably. The dogs are rarely noisy, unless they are disturbed. They would be constantly disturbed if there was a traveller site next door. This would result in stressed animals and residents, including the travellers themselves. RSPCA staff and volunteers daily exercise the dogs but say they could not risk walking their nervous, abandoned charges passed a traveller site.

Land Presentation – The topography of this site, as it stands, is not totally suitable for the proposed use. Again the Policy Review Group has already identified and recorded that the topography of the triangular site is unsuitable but is now choosing to ignore it.

Amenities – Access to local amenities is via an underpass to Ringland. This underpass has in the past been often locked due to safety and antisocial behaviour issues. Such issues are likely to be considerably exacerbated by the proposed development thus putting travellers and their families at risk. The Travellers themselves have also expressed concerns.

Noise – As the site is adjacent the busy main railway line there will be noise problems that will be a particular issue for caravans. A noise attenuation fence is proposed here but due to the level of noise will be of little effect.

Potential danger caused by animals – it is well know that many traveller families may keep a stock of ponies and horses now or in the future. There are many well documented examples of these animals escaping their confines. An animal of this nature running out onto the Railway, SDR or found wandering through the adjacent Schools or neighbouring Ringland Estate or Llanwen Village will undoubtedly cause issues and even cost lives in the case of the Railway or SDR.

Aspect – The site will be highly visible from the busy mainline railway and would potentially create a poor image of Newport.

The Process – The Scrutiny Report dated 29th October, 2012 and, consequently, accepted by Cabinet on 12th November 2012 is inconsistent, biased, is incomplete in its assessments made and offers no analytical evidence of the preferences made for the selection of travellers sites as claimed. The Policy Review Group recommendations display a lack of understanding of the Travellers needs which was further reinforced by a member of the Policy Review Group during Full Council on 4th June 2013 displaying a serious lack of understanding of what constitutes a Travellers Site thus casting further, serious, doubt on the integrity of the aforementioned report they produced.
Ringland Allotments:

Health Issues and Pylons - No concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

Location - The site is adjacent to the settlement boundary and considered to be a reasonably sustainable location. More remote locations that are further outside of the settlement boundary have poorer access to amenities and place more of an emphasis on car travel, therefore deemed to be more unsustainable.

Land Presentation – Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development. The results of these surveys have confirmed that some ground re-profiling works will be required at the Former Ringland Allotments. This work will add to the development costs but is not considered to be insurmountable.

Access – Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

Existing Use – There are no allotments on the site. Alternative allotment provision can be investigated if it is demonstrated there is insufficient allotment provision across Newport as a whole.

Aspect – A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

Highway Safety - Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

Environmental – The Council Strategy is a Brownfield led strategy and preference is given to sites which are previously developed. A number of greenfield sites are within the Plan as they are considered appropriate and well located for development. This is why this site is included.

Amenities - It is agreed that the locking of the underpass is something that needs to be avoided in order to ensure access to local amenities.

Flooding – Flood risk at this site is not considered to be a significant risk.

Financial Implications – The Council is aware of the potential financial implications of going ahead with the site. Gallagher Estates have planning permission for their major development in close proximity to the site and although they have submitted representations of concern, they are currently continuing to submit information to enable them to discharge planning conditions and get on site and build.

Privacy and Noise - A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

Potential danger caused by animals - The Council has a duty to provide accommodation for the Gypsy/Traveller population. We do not have a duty to provide land for horses. The site will be owned by the Council and there is no intention to allow the occupants to keep horses on site.

The Process – The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.

Crime/Perception of Crime – As with any other significant development, the Council has liaised with the police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the police if any incidents of crime that relate to the site are reported.

Alternative Sites – Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

House Prices – The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well...
managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.
Document: Revised LDP, p.76
Policy: H16.02
Summary: Objection to proposed Gypsy and Traveller site at Former Ringland Allotments
I the undersigned wish to register our objection to the Gypsy and Traveller site proposed at the Former Ringland Allotments.

My reasons are summarised as follows:

Council guidelines - Part of the original 220 site survey quoted that this site was unsuitable due to there being "Pylons on site and unsuitable access", this hasn't changed and remains a major issue. This is one of the main reasons the travellers themselves do not want to occupy this site.

Health issues related to pylons - There are numerous well documented papers relating to the health consequences of living near to electricity pylons. A study of childhood cancers recorded between 1963 and 1995 in England and Wales revealed that there is an increase in risk of children contracting leukaemia of 69% if they live within 200m of a power line and 23% if they live within 600m of a power line.

Location - The Council have favoured sites to the east of Newport as the preferred location. Travellers have expressed no such preference as to the location and are more concerned as to establishing a selection on suitability not location.

Land presentation - This site is not on level ground. The site is on a gradient unsuitable for sating caravans.

Access - Access to this would shared with the proposed 1100 houses of Gallagher development which would increase traffic many fold on what is effectively a country lane. The turning in and out of the site by vehicles would be problematic given the location of the land the fact that the road turns directly off from the 50mph limit SDR.

The Council has previously identified this land in part for the provision of a roundabout which would then create an access to the proposed site directly off or close to that roundabout. Such situation at the other possible sites has been condemned by both the Police and Highway Authorities.

Existing use - The allotment site is still a Statutory Allotment site and is not surplus to the requirement of the residents.

Aspect - The site is highly visible from the A48 so would potentially create a very poor image of Newport as this is one of the major routes into the city. The site would afford no privacy for families living there.

Safety - The A48 is a very busy major route into Newport and has a 50mph speed limit and the regular movement of heavy goods vehicles. Caravans and trailers would severely worsen the road safety situation.

Environmental - Council guidelines dictate that when selecting sites priority should be given the Brown Field. This area is an undeveloped green field site which is outside current development boundaries and currently provides a green wedge.

Amenities - Access to local amenities is via underpass to Dawson Close in Ringland. This underpass has previously had to be locked on a regular basis due to safety and antisocial behaviour issues. Such issues are likely to be considerable exacerbated by the proposed development. The access to the underpass is also often affected by flooding during periods of heavy rain.

Flooding - The A48 is often affected by flooding due to run off of surface water from the site and this would be exacerbated by the proposed development. Pooling water on a main access route with a 50mph speed limit creates a considerable safety hazard.

Financial Implications - The development of adjacent land for housing by Gallagher Estates would be very unlikely to go ahead if a Gypsy and Traveller site were provided on this land. This would be a loss to the City of amongst other things the payment of the 106 agreement.

Privacy - Due to the closeness of the SDR and the openness of the site there would be privacy issues.

Noise - Due to the closeness of the SDR there would be a noise issue.
Potential danger caused by animals - it is well know that many traveller families keep a stock of ponies and horses. There are also many well documented examples of these animals escaping their confines. An animal of this nature running out onto the SDR of found wandering through the neighbouring Ringland Estate will undoubtedly cause issues and even cost lives in the cases of the SDR.

The process - the Scrutiny Report dated 29th October, 2012 and, consequently, accepted by Cabinet on 12th November 2012 is inconsistent, biased, is incomplete in its assessments made and offers no analytical evidence of the preferences made for the selection of travellers sites as claimed. The Policy Review Group recommendations display a lack of understanding of the Travellers needs which was further reinforced by a member of that Review Group, during the Full Council meeting dated 4 June 2013, displaying a serious lack of understanding of what constitutes a travellers site thus casting further, serious, doubt on the integrity of the aforementioned report they produced.

In conclusion this site is unsuitable for the provision of a traveller site. Further the integrity of the Policy Review Group’s Report, recommendations and conclusions are questionable for the reasons given. Moreover, there are no sound, sustainable, reasons for removing the sites previously proposed.
Ringland Allotments:

Health Issues and Pylons - No concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

Location - The site is adjacent to the settlement boundary and considered to be a reasonably sustainable location. More remote locations that are further outside of the settlement boundary have poorer access to amenities and place more of an emphasis on car travel, therefore deemed to be more unsustainable.

Land Presentation – Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development. The results of these surveys have confirmed that some ground re-profiling works will be required at the Former Ringland Allotments. This work will add to the development costs but is not considered to be insurmountable.

Access – Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

Existing Use – There are no allotments on the site. Alternative allotment provision can be investigated if it is demonstrated there is insufficient allotment provision across Newport as a whole.

Aspect – A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

Highway Safety - Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

Environmental – The Council Strategy is a Brownfield led strategy and preference is given to sites which are previously developed. A number of greenfield sites are within the Plan as they are considered appropriate and well located for development. This is why this site is included.

Amenities - It is agreed that the locking of the underpass is something that needs to be avoided in order to ensure access to local amenities.

Flooding – Flood risk at this site is not considered to be a significant risk.

Financial Implications – The Council is aware of the potential financial implications of going ahead with the site. Gallagher Estates have planning permission for their major development in close proximity to the site and although they have submitted representations of concern, they are currently continuing to submit information to enable them to discharge planning conditions and get on site and build.

Privacy and Noise - A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

Potential danger caused by animals - The Council has a duty to provide accommodation for the Gypsy/Traveller population. We do not have a duty to provide land for horses. The site will be owned by the Council and there is no intention to allow the occupants to keep horses on site.

The Process – The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.

Crime/Perception of Crime – As with any other significant development, the Council has liaised with the police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the police if any incidents of crime that relate to the site are reported.

Alternative Sites – Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

House Prices – The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well
managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.
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Document: Revised LDP, p.76
Policy: H16.01
Summary: Object to proposed Gypsy and Traveller site at Hartridge Farm Road
The undersigned wish to register my objection to the Gypsy and Traveller site proposed at Hartridge Farm Road and Ringland Allotments.

My reasons are summarised as follows:

Size – The proposed size of the site is unimaginable and is far outside the Welsh Assembly Government’s Guidelines and Good Practice. The site is intended to have up to 43 pitches with each pitch having up to 3 to 4 caravans. This will make this site not just the biggest in Britain but the biggest in Europe. Such a development will not be in the interest of Newport itself. Further a site of this scale will not encourage the integration of travellers within the community but is likely to have the opposite effect. Therefore the proposal itself is inconceivable.

Layout – The proposed layout is contrary to the good faith of the Welsh Assembly Government’s Guidelines and Good Practice. To take a single large site and split it into three sites to house all three families flagrantly contravenes the guidelines and will dominate the immediate small community. It is also unfair to the travellers as they do not want communal sites as it will promote conflict within the families as well as likely to infringe the human rights of both the travellers and the immediate communities alike.

Location – This site is not suitable and other sites are more suitable. The location of the site is regarded by the Travellers themselves as unsuitable as they have justifiable concerns being too close to Llanwern High School with regard to conflict. Their preference is to be more remote. Further consideration should be given other sites such as the former speedway site, and similar, that have previously been nominated by both travellers and non-travellers alike, and to those sites identified in the existing Local Development Plan as being more favourable. The revised version of the plan does not give due consideration to the alternative sites available, nor does it provide sustainable reasons for rejecting those previously preferred.

In the revised draft plan, the Council have favoured sites to the east of Newport as the preferred locations. Travellers have expressed no such preference and are more concerned that selections should be based on the suitability of each individual site.

Current use – The Road Safety Centre is the focal point of contact for all road safety education, training and publicity service in Newport and surrounding area. To lose this facility would be a great loss to Newport as some courses in particular develop an understanding of behaviour and attitude and build confidence in the students (especially those of low attainment) themselves and many go on to a career in motor maintenance and the like from the experience and knowledge they have gained. Further, the Centre is within walking distance for the Llanwern High School pupils.

Proximity to Sewage Pumping Station – This site is located within a close proximity to a sewage pumping station. There may be health implications linked to the airborne particles produced by these stations.

Access – This site has restricted access along a lane adjacent to two schools. The schools attract a tremendous amount of traffic at peak times while Hartridge Farm Road alongside the houses there are no footpaths, no street lighting and the road narrows to just 15 feet. The road leading up to the site is in poor condition and barely suits its current needs. This would need extensive and costly refurbishment. The Policy Review Group has already identified and recorded vehicle access issues for the triangular site but is now choosing to ignore it.

Llanwern High School – Because of parents’ perception of traveller sites, rightly or wrongly, it would undermine the Council’s strategy of improving education in the east of the city. (Prior to the building of the new High School parents were reluctant to send their children to the old Hartridge School, choosing St Julian’s, Caerleon, Caldicot or Chepstow Schools instead). The remarkable transformation of the new building and the look, attitude and pride of the pupils has changed that. However, all the good work put into the new school could be undermined and the impressive new Llanwern High School could become a very expensive, underused, facility.

Ysgol Gymraeg Casnewydd – Again because of parents’ perception of traveller sites, rightly or wrongly, parents are likely to reconsider their choice of school for their children. This would undermine further the already fragile financial position of the school thus deterring future needed investment.

Financial Matters – The Council’s financial strategy will also be undermined because the proposed site is designated for building and the capital receipts used to offset the cost of the new Llanwern...
School and so reduce the Council’s debt.

RSPCA Centre – For years the RSPCA Centre and the residents have co-existed amicably. The dogs are rarely noisy, unless they are disturbed. They would be constantly disturbed if there was a traveller site next door. This would result in stressed animals and residents, including the travellers themselves. RSPCA staff and volunteers daily exercise the dogs but say they could not risk walking their nervous, abandoned charges passed a traveller site.

Land Presentation – The topography of this site, as it stands, is not totally suitable for the proposed use. Again the Policy Review Group has already identified and recorded that the topography of the triangular site is unsuitable but is now choosing to ignore it.

Amenities – Access to local amenities is via an underpass to Ringland. This underpass has in the past been often locked due to safety and antisocial behaviour issues. Such issues are likely to be considerably exacerbated by the proposed development thus putting travellers and their families at risk. The Travellers themselves have also expressed concerns.

Noise – As the site is adjacent the busy main railway line there will be noise problems that will be a particular issue for caravans. A noise attenuation fence is proposed here but due to the level of noise will be of little effect.

Potential danger caused by animals – it is well know that many traveller families may keep a stock of ponies and horses now or in the future. There are many well documented examples of these animals escaping their confines. An animal of this nature running out onto the Railway, SDR or found wandering through the adjacent Schools or neighbouring Ringland Estate or Llanwern Village will undoubtedly cause issues and even cost lives in the case of the Railway or SDR.

Aspect – The site will be highly visible from the busy mainline railway and would potentially create a poor image of Newport.

The Process – The Scrutiny Report dated 29th October, 2012 and, consequently, accepted by Cabinet on 12th November 2012 is inconsistent, biased, is incomplete in its assessments made and offers no analytical evidence of the preferences made for the selection of travellers sites as claimed. The Policy Review Group recommendations display a lack of understanding of the Travellers needs which was further reinforced by a member of the Policy Review Group during Full Council on 4th June 2013 displaying a serious lack of understanding of what constitutes a Travellers Site thus casting further, serious, doubt on the integrity of the aforementioned report they produced.

In conclusion this site is neither suitable for the provision of traveller sites nor is such a massive site, the biggest in Europe, in the interest of Newport. Further the integrity of the Policy Review Group's Report, recommendations and conclusions are questionable for the reasons given. Moreover, there are no sound reasons for removing the sites previously proposed.
13  Council Response

It is acknowledged that the size of the Hartridge Farm Road site is larger than Welsh Government guidance suggests, however this will avoid the need to split any of the individual families, which is an important factor for the families themselves. The size is sufficient to accommodate all 3 families, which would meet Newport’s residential need for Gypsy/Traveller provision. The proposed layout would use screening to effectively create 3 independent sites within the curtilage of the whole site. The site would also be screened from the road and nearby residential properties.

The site is within the settlement boundary and considered to be a sustainable location. Remote locations outside of the settlement boundary have poorer access to amenities and place more of an emphasis of car travel, therefore deemed to be more unsustainable. Site design can ensure it is well screened from the nearby RSPCA Centre and Llanwern High School.

The Road Safety Centre at the site would need to be relocated. The Council will assist with the relocation as best it can. This would be the case for any proposed use of the site. With regards to the proximity to Sewage Pumping Station, no concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

It is acknowledged that the Hartridge Farm Road site will require improvements to the access road including the provision of a length of pavement. This will be agreed as part of a planning application and is not considered insurmountable.

The site will be well screened and should not impact on Llanwern High School or Ysgol Gymraeg Casnewydd. Perception of Gypsy/Travellers at the Schools is something that the Council will need to address through interaction with the Head Teacher and Governors.

The Council is aware of the financial implications to its budget.

The draft indicative layout of this site shows that a significant buffer could be provided between the RSPCA Centre and the pitches.

Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development. Ground re-profiling works will be required at Hartridge Farm Road and the work will add to the development costs, but is not considered insurmountable.

It is agreed that the locking of the underpass is something that needs to be avoided in order to ensure access to local amenities. The site is also within a short walk from Newport Retail Park.

A noise assessment has been undertaken for Hartridge Farm Road. It is proposed that a 1.8m high noise attenuation fence is constructed adjacent to the RSPCA Centre, alongside the mainline railway and between the SDR and north-eastern part of the site.

The Council has a duty to provide accommodation for the gypsy/traveller population. We do not have a duty to provide land for horses. The site will be owned and managed by the Council and there is no intention to allow the occupants to keep horses on site.

A noise attenuation fence will be constructed alongside the mainline railway and the area will be well screened.

The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.
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Document: Revised LDP, p.76

Policy: H16.02

Summary: Object to proposed Gypsy and Traveller site at Former Ringland Allotments.
I the undersigned wish to register my objection to the Gypsy and Traveller site proposed at Hartridge Farm Road and Ringland Allotments.

My reasons are summarised as follows:

Size – The proposed size of the site is unimaginable and is far outside the Welsh Assembly Government’s Guidelines and Good Practice. The site is intended to have up to 43 pitches with each pitch having up to 3 to 4 caravans. This will make this site not just the biggest in Britain by the biggest in Europe. Such a development will not be in the interest of Newport itself. Further a site of this scale will not encourage the integration of travellers within the community but is likely to have the opposite effect. Therefore the proposal itself is inconceivable.

Layout – The proposed layout is contrary to the good faith of the Welsh Assembly Government’s Guidelines and Good Practice. To take a single large site and split it into three sites to house all three families flagrantly contravenes the guidelines and will dominate the immediate small community. It is also unfair to the travellers as they do not want communal sites as it will promote conflict within the families as well as likely to infringe the human rights of both the travellers and the immediate communities alike.

Location – This site is not suitable and other sites are more suitable. The location of the site is regarded by the Travellers themselves as unsuitable as they have justifiable concerns being too close to Llanwern High School with regard to conflict. Their preference is to be more remote. Further consideration should be given other sites such as the former speedway site, and similar, that have previously been nominated by both travellers and non-travellers alike, and to those sites identified in the existing Local Development Plan as being more favourable. The revised version of the plan does not give due consideration to the alternative sites available, nor does it provide sustainable reasons for rejecting those previously preferred.

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Proximity to Sewage Pumping Station – This site is located within a close proximity to a sewage pumping station. There may be health implications linked to the airborne particles produced by these stations.

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Llanwern High School – Because of parents’ perception of traveller sites, rightly or wrongly, it would undermine the Council’s strategy of improving education in the east of the city. (Prior to the building of the new High School parents were reluctant to send their children to the old Hartridge School, choosing St Julian’s, Caerleon, Caldicot or Chepstow Schools instead). The remarkable transformation of the new building and the look, attitude and pride of the pupils has changed that. However, all the good work put into the new school could be undermined and the impressive new Llanwern High School could become a very expensive, underused, facility.

Ysgol Gymraeg Casnewydd – Again because of parents’ perception of traveller sites, rightly or wrongly, parents are likely to reconsider their choice of school for their children. This would undermine further the already fragile financial position of the school thus deterring future needed investment.

Financial Matters – The Council’s financial strategy will also be undermined because the proposed site is designated for building and the capital receipts used to offset the cost of the new Llanwern

12/02/2014
School and so reduce the Council’s debt.

RSPCA Centre – For years the RSPCA Centre and the residents have co-existing amicably. The dogs are rarely noisy, unless they are disturbed. They would be constantly disturbed if there was a traveller site next door. This would result in stressed animals and residents, including the travellers themselves. RSPCA staff and volunteers daily exercise the dogs but say they could not risk walking their nervous, abandoned charges passed a traveller site.

Land Presentation – The topography of this site, as it stands, is not totally suitable for the proposed use. Again the Policy Review Group has already identified and recorded that the topography of the triangular site is unsuitable but is now choosing to ignore it.

Amenities – Access to local amenities is via an underpass to Ringland. This underpass has in the past been often locked due to safety and antisocial behaviour issues. Such issues are likely to be considerably exacerbated by the proposed development thus putting travellers and their families at risk. The Travellers themselves have also expressed concerns.

Noise – As the site is adjacent the busy main railway line there will be noise problems that will be a particular issue for caravans. A noise attenuation fence is proposed here but due to the level of noise will be of little effect.

Potential danger caused by animals – it is well know that many traveller families may keep a stock of ponies and horses now or in the future. There are many well documented examples of these animals escaping their confines. An animal of this nature running out onto the Railway, SDR or found wandering through the adjacent Schools or neighbouring Ringland Estate or Llanwen Village will undoubtedly cause issues and even cost lives in the case of the Railway or SDR.

Aspect – The site will be highly visible from the busy mainline railway and would potentially create a poor image of Newport.

The Process – The Scrutiny Report dated 29th October, 2012 and, consequently, accepted by Cabinet on 12th November 2012 is inconsistent, biased, is incomplete in its assessments made and offers no analytical evidence of the preferences made for the selection of travellers sites as claimed. The Policy Review Group recommendations display a lack of understanding of what constitutes a Travellers Site thus casting further, serious, doubt on the integrity of the aforementioned report they produced.

In conclusion this site is neither suitable for the provision of traveller sites nor is such a massive site, the biggest in Europe, in the interest of Newport. Further the integrity of the Policy Review Group's Report, recommendations and conclusions are questionable for the reasons given. Moreover, there are no sound reasons for removing the sites previously proposed.
Ringland Allotments:

Health Issues and Pylons - No concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

Location - The site is adjacent to the settlement boundary and considered to be a reasonably sustainable location. More remote locations that are further outside of the settlement boundary have poorer access to amenities and place more of an emphasis on car travel, therefore deemed to be more unsustainable.

Land Presentation – Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development. The results of these surveys have confirmed that some ground re-profiling works will be required at the Former Ringland Allotments. This work will add to the development costs but is not considered to be insurmountable.

Access – Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

Existing Use – There are no allotments on the site. Alternative allotment provision can be investigated if it is demonstrated there is insufficient allotment provision across Newport as a whole.

Aspect – A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

Highway Safety - Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

Environmental – The Council Strategy is a Brownfield led strategy and preference is given to sites which are previously developed. A number of greenfield sites are within the Plan as they are considered appropriate and well located for development. This is why this site is included.

Amenities - It is agreed that the locking of the underpass is something that needs to be avoided in order to ensure access to local amenities.

Flooding – Flood risk at this site is not considered to be a significant risk.

Financial Implications – The Council is aware of the potential financial implications of going ahead with the site. Gallagher Estates have planning permission for their major development in close proximity to the site and although they have submitted representations of concern, they are currently continuing to submit information to enable them to discharge planning conditions and get on site and build.

Privacy and Noise - A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

Potential danger caused by animals - The Council has a duty to provide accommodation for the Gypsy/Traveller population. We do not have a duty to provide land for horses. The site will be owned by the Council and there is no intention to allow the occupants to keep horses on site.

The Process – The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.

Crime/Perception of Crime – As with any other significant development, the Council has liaised with the police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the police if any incidents of crime that relate to the site are reported.

Alternative Sites – Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
House Prices – The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.
### Representation Details

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Document: Revised LDP, p.76  
Policy: H16.02  
Summary: Object to proposed Gypsy and Traveller Site at Former Ringland Allotments

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**Item Question**  
**Representation Text**
Representation Details

by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M

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I the undersigned wish to register our objection to the Gypsy and Traveller site proposed at the Former Ringland Allotments.

My reasons are summarised as follows:

Council guidelines - Part of the original 220 site survey quoted that this site was unsuitable due to there being "Pylons on site and unsuitable access", this hasn't changed and remains a major issue. This is one of the main reasons the travellers themselves do not want to occupy this site.

Health issues related to pylons - There are numerous well documented papers relating to the health consequences of living near to electricity pylons. A study of childhood cancers recorded between 1983 and 1995 in England and Wales revealed that there is an increase in risk of children contracting leukaemia of 69% if they live within 200m of a power line and 23% if they live within 600m of a power line.

Location - The Council have favoured sites to the east of Newport as the preferred location. Travellers have expressed no such preference as to the location and are more concerned as to establishing a selection on suitability not location.

Land presentation - This site is not on level ground. The site is on a gradient unsuitable for siting caravans.

Access - Access to this would shared with the proposed 1100 houses of Gallagher development which would increase traffic many fold on what is effectively a country lane. The turning in and out of the site by vehicles would be problematic given the location of the land the fact that the road turns directly off from the 50mph limit SDR.

The Council has previously identified this land in part for the provision of a roundabout which would then create an access to the proposed site directly off or close to that roundabout. Such situation at the other possible sites has been condemned by both the Police and Highway Authorities.

Existing use - The allotment site is still a Statutory Allotment site and is not surplus to the requirement of the residents.

Aspect - The site is highly visible from the A48 so would potentially create a very poor image of Newport as this is one of the major routes into the city. The site would afford no privacy for families living there.

Safety - The A48 is a very busy major route into Newport and has a 50mph speed limit and the regular movement of heavy goods vehicles. Caravans and trailers would severely worsen the road safety situation.

Environmental - Council guidelines dictate that when selecting sites priority should be given the Brown Field. This area is an undeveloped green field site which is outside current development boundaries and currently provides a green wedge.

Amenities - Access to local amenities is via underpass to Dawson Close in Ringland. This underpass has previously had to be locked on a regular basis due to safety and antisocial behaviour issues. Such issues are likely to be considerable exacerbated by the proposed development. The access to the underpass is also often affected by flooding during periods of heavy rain.

Flooding - The A48 is often affected by flooding due to run off of surface water from the site and this would be exacerbated by the proposed development. Pooling water on a main access route with a 50mph speed limit creates a considerable safety hazard.

Financial Implications - The development of adjacent land for housing by Gallagher Estates would be very unlikely to go ahead if a Gypsy and Traveller site were provided on this land. This would be a loss to the City of amongst other things the payment of the 106 agreement.

Privacy - Due to the closeness of the SDR and the openness of the site there would be privacy issues.

Noise - Due to the closeness of the SDR there would be a noise issue.
Potential danger caused by animals - it is well know that many traveller families keep a stock of ponies and horses. There are also many well documented examples of these animals escaping their confines. An animal of this nature running out onto the SDR of found wandering throughout the neighbouring Ringland Estate will undoubtedly cause issues and even cost lives in the cases of the SDR.

The process - the Scrutiny Report dated 29th October, 2012 and, consequently, accepted by Cabinet on 12th November 2012 is inconsistent, biased, is incomplete in its assessments made and offers no analytical evidence of the preferences made for the selection of travellers sites as claimed. The Policy Review Group recommendations display a lack of understanding of the Travellers needs which was further reinforced by a member of that Review Group, during the Full Council meeting dated 4 June 2013, displaying a serious lack of understanding of what constitutes a travellers site thus casting further, serious, doubt on the integrity of the aforementioned report they produced.

In conclusion this site is unsuitable for the provision of a traveller site. Further the integrity of the Policy Review Group's Report, recommendations and conclusions are questionable for the reasons given. Moreover, there are no sound, sustainable, reasons for removing the sites previously proposed.
Ringland Allotments:

Health Issues and Pylons - No concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

Location - The site is adjacent to the settlement boundary and considered to be a reasonably sustainable location. More remote locations that are further outside of the settlement boundary have poorer access to amenities and place more of an emphasis on car travel, therefore deemed to be more unsustainable.

Land Presentation – Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development. The results of these surveys have confirmed that some ground re-profiling works will be required at the Former Ringland Allotments. This work will add to the development costs but is not considered to be insurmountable.

Access – Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

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The Process – The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.

Crime/Perception of Crime – As with any other significant development, the Council has liaised with the police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the police if any incidents of crime that relate to the site are reported.

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Representation Details

by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M

Rep'n/Para/Policy Representer Agent Accession No Date Lodged Late? Source Type Mode Status Status Modified

3931.L1//H15.01 Davies, Dr John 26/07/2013 O M

Document: Revised LDP, p.75
Policy: H15.01 Map: Proposals West: Proposals Plan - West
Summary: Delete Gypsy and Traveller site at Celtic Way.

Item Question Representation Text

10 10 Soundness Test
C1, C2, C3, CE1
I am writing on behalf of Silver Telecom Limited to object to the proposal for a transit camp to be sited at land on Celtic Way, Duffryn, Newport.

Your representation form outlines the tests of soundness which the revised plan must conform to. However, in my opinion, this proposal does not meet the following tests of soundness:

- C1 - it is a land use plan which has had regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.
- C2 - it has regard to national policy.
- C3 - it has regard to the Wales Spatial Plan.
- CE1 - the plan sets out a 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.

LAND AT CELTIC WAY

The land at Celtic Way forms part of a larger business park known as Imperial Park or Duffryn Business Park. This is the premier employment location within Newport and, indeed, one of the strongest business parks in South Wales in terms of critical mass of existing employers and generating enquiries from new, or relocating, businesses.

However, there remain vacant buildings and sites available for occupation and it is important that we retain the highest quality business environment in order that we may attract further high quality corporate investors.

POLICY OBJECTIONS

The proposal to allocate the land at Celtic Way for a gypsy and travellers transit camp is, in my opinion, not appropriate. This is due to the fact that there is a significant inconsistency with national and regional planning policy.

Planning Policy Wales (PPW) sets the context for planning in Wales under which Newport City Council is to prepare its Statutory Development Plan. PPW is the principal and authoritative source of national planning policy with the fifth edition issued in November 2012 incorporating amendments to strengthen chapter seven on Economic Development. This latest edition includes a requirement that Local Planning Authorities plan for the whole economy and develop a comprehensive understanding of local economies and wider regional economies. The revision, in November 2012, instructed Local Planning Authorities to ensure that economic benefits associated with development are understood and that there should be recognition that there will be occasions when the economic benefit will outweigh social and environment considerations (para 7.2.2).

Planning Policy Wales, Edition 5, also instructed that Development Plans should include “… policies relating to future development on existing employment sites to protect them from inappropriate development” and to use the evidence base to set out an economic vision for the specific area. Indeed, mixed use development is to be promoted only where appropriate.

The Newport LDP Revised Deposit Plan also highlights the key importance of economic growth and Objective 3 states that the Plan seeks to “… enable a diverse economy that meets the needs of the people of Newport and those of the wider South East Wales economic region”. In addition, Policy SP18 states that there are available employment sites in West Newport where substantial development has already taken place and the Plan identifies that there are business advantages in locating near to other similar uses.

Policy EM1, 6.6, identifies Duffryn as a large scale strategic development area well connected to the M4, containing some of the most prestigious employment developments within Newport. The policy notes that “… there are some areas of development still available on this prestigious site for B1 and B2 uses, however, the owner (Welsh Government) has designated the site for single large user
projects of at least 10 ha at a time.”

I understand that this land is owned by Welsh Government. Can you please confirm whether or not you have their agreement to this change of use? I have also been informed by a professional planning consultant that you do not have the authority to compulsory purchase land owned by the Welsh Government, could you confirm this please.

SPECIFIC COMPANY OBJECTIONS

I operate an independent cardiac clinic and our clientele consist of corporate executives and the elderly. Last year there were several gypsy caravans parked temporarily on the grass verge along Imperial Way outside Imperial Courtyard. Every patient commented on the litter which they had generated and their close proximity. My staff were scared and kept the front door locked. When the caravans left, there were gas bottles abandoned and large quantities of litter in our car park. Previously, local gypsies camped with horses which galloped freely through Imperial Courtyard and left manure on the path and on the grass outside our front door. They ran on to the A48 road and police were involved. This is not the type of environment I wish to expose my clients to, and I am very concerned about the health and safety of my employees.

A local transit camp would necessitate significant extra security measures would drive up costs and affect my competitiveness. This could ultimately affect any expansion plans I might have.

My current lease runs out in approximately 2 year’s time. If the camp goes ahead and cause any problems, I will give serious consideration to moving my business.

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12 12 Speaking at Public Examination

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2 2 Soundness of LDP

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13 13 Council Response

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

The Welsh Government are the owners of the land NCC will need to continue their discussions with them.

The transit site will be clearly defined, maintained and managed. TAs with any other significant development, the Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
### Representation Details

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Document: Revised LDP, p.75

Policy: H15.01

Summary: Object to proposed Gypsy and Traveller site at Celtic Way

Additional material submitted - Please click here

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Item Question Representation Text
I am writing to log my objection to the proposed transit Gypsy Traveller Site at Celtic Way on the grounds of Health and Safety (Newport Local Development Plan 2011-26/ Revised Deposit Plan).

The Welsh Government state clearly in their document ‘Designing Gypsy and Traveller Sites Good Practice Guide (2008), in section 3.3: ‘It is essential to ensure that the location of a site will provide a safe environment for the residents. Sites should not be situated near refuse sites, industrial processes or other hazardous places, as this will obviously have a detrimental effect on the general health and well-being of the residents and pose particular safety risks for young children. All prospective site locations should be considered carefully before any decision is taken to proceed, to ensure that the health and safety of prospective residents are not at risk.’ Clearly safety is of key importance.

Similarly in the Welsh Governments ‘A Road Less Travelled - A Draft GypsyTraveller Strategy Consultation Document’ clearly state that health and safety requirements including the safety of play areas are of high importance.

I am therefore absolutely amazed and horrified on this basis, that Newport Council in their Revised Deposit Plan (June 2013) as part of their Local Development Plan, have actively chosen to site the proposed transit Gypsy Traveller Site at Celtic Way (see appendix one), which has to constitute probably one of the most dangerous pieces of land in Newport.

OPEN WATER

The proposed site is situated in an area known as Celtic Lakes; it gets its name from the thirteen areas of open water or lakes in the immediate vicinity of the proposed transit Gypsy Traveller Site at Celtic Way (see appendix two). It is therefore important to note that:

1. There are thirteen separate areas of open water or lakes in the immediate vicinity of the proposed Gypsy Traveller Site (see appendix one).
2. These thirteen lakes give a combined total surface area of water of 38,276 square metres.
3. The lakes range from the largest with a surface area of 8,376 square meters to the smallest with a surface area of 890 square meters.
4. To give some perspective on the scale of the open water in the area, the total surface area of water from these lakes is nearly double the total ground area of the proposed Traveller site, which is in the region of 24,564 square meters or 6.07 acres.
5. The nearest lake is just 22 metres from the site, again to put this into perspective, the average family car being just under 5 meters long, this means that the open water is between 4 to 5 car lengths from the proposed Traveller site.
6. Also the nearest lake to the proposed site is one of the largest of the lakes and has a surface water area of 6,070 square meters.
7. The furthest lake is a mere 680 metres, but five of the lakes are only between 200 and 350 metres from the proposed site.
8. Within 402 meters I X mile of the proposed site there is a total of 15,577 square meters of surface water or lakes which equates to 3.85 acres.
9. Within 804 metres I X mile there is at total of 38,276 square meters of surface water or lakes which equates to 9.46 acres.
10. All of the lakes are VERY CLOSE to the proposed Traveller site, they are not enclosed, there are no warning signs in place and no buoyancy aids for first aid purposes.
11. As well as these identified lakes there is a myriad of water ways including reanes and drainage ditches with very steep sides, therefore a child falling into one of these ditches may not be able to climb back out.
12. The reanes and ditches equate to approximately 5,760 metres or 3.6 miles of waterways within X a mile from the proposed site (See appendix 3).
13. There are no street lights in this area which means that the area is very poorly lit, this significantly increases the risk of a child falling into one of these areas of open water and drowning.

The Environment Agency UK(2006) reported that drowning is the third most common cause of accidental death among young people in England, Wales and Northern Ireland, with average of 300 such deaths each year. The agency also states that the highest death toll within inland areas of water is attributed to drainage control ditches in urban sites. Furthermore, the Environment Agency UK(2006) goes on to say that two of the most significant causes of drowning are due to ‘unfamiliar surroundings’ and an ‘inability for the person to save themselves or be rescued’.

The National Water Safety Forum Ukfigures released for 2011 (the latest available) for cases of drowning, showed that 701 people drowned in 2011, of those approximately a third (n=247) drowned in inland water, such as that at Celtic Way. There is also a significant risk during winter months for areas of open water when the water freezes over, with children and adults falling through the ice and dying.

For those children who fall into water and don’t drown, the Swimming Pool Amendment Bill (2009) states that 20% are left with ‘debilitating injuries that will carry on for the rest of their lives….many of these injuries are brain related and incurable’. One further issue to consider according to the Environment Agency UK(2006) are the ill-health risks associated with a person having been in water of this nature.
It is pertinent that during this consultation process, the RLSS UKCardiff Branch, featured on the BBC breakfast show on July 14th highlighting that there have been four deaths in the week preceding the broadcast, all of which had occurred in lakes and pools. Also between the 14th and 31st of July the BBC have reported a further 6 deaths from drowning in inland open water, three of which were in Wales and two of them in South Wales.

Furthermore, the UK Fire Brigade (2012) report in section 11 of the Fire and Rescue Services Act that the fire brigade is 'required to equip themselves for dealing with eventualities (other than fires) which pose a threat to human life or endanger animals' because they report that in the UK about 4,000 to 5,000 large animal rescue operations each year.* There is the potential for ponies to fall into the lakes or ditches in this area and being unable to get back out.

Risk assessment

Carrying out a risk assessment, with a surface area of water of 38,276 from the thirteen lakes and 3.6 miles of reanes and drainage ditches the probability of a child falling into one of these areas of water is VERY HIGH (score of 5 on the risk table).

The likely impact of a child drowning in the water surrounding the proposed site is a HIGH (score 4 on *) the risk table), escalated to VERY HIGH (score 5 on the risk table) due to the nature of the transit site with children only staying for a two week period and therefore not familiar with the surroundings including the thirteen lakes and myriad of reanes and drainage ditches surrounding the proposed site.

Therefore, the risk of a fatality due to drowning, if the transit Gypsy Traveller site is situated in Celtic Way, adjacent to thirteen lakes and a myriad of reanes and drainage ditches, is shown to be 25, THE HIGHEST POSSIBLE RISK. A risk which falls into the red area of the risk table - highest possible risk requires IMMEDIATE ACTION.

ROAD NETWORK

A second safety issues that needs to be raised in relation to the proposed Gypsy Traveller Site if it were to be situated in Celtic Way is the danger from the road network in the area (see appendix four). Again The Welsh Government state clearly in their document 'Designing Gypsy and Traveller Sites Good Practice Guide (2008) in section 3.10, that 'Sites adjacent to light industrial areas therefore tend not to be popular because of... safety fears (when walking home at night for instance).’

It is important to note that:
- The proposed site is situated in a commercial/business / light industrial area.
- There is no pavement access to the proposed site meaning that pedestrians would have to walk on the road to access any local amenities including school, bus stop, shop etc.
- The road access to the proposed site is in an industrial area, therefore there will be a significant number of commercial type vehicles in the immediate including vans, trucks and lorries.
- Due to the nature of the area being a business or commercial area the commercial vehicles will be accessing the immediate area both day and night.
- There are no lampposts in the immediate vicinity of the proposed site therefore the area is very poorly lit.
- The road access to the proposed site at Celtic Way is a 40mph road.
- The A48, a 40 or 50 mph road is a mere 0.34 miles from the proposed site.
- The planned extensive development to link up with the Southern Distributor Road, a 50mph very busy road, is a mere 0.38 miles from the proposed site which is due to be completed within the life of the local Development Plan.
- The M4 relief road proposed location is 0.44 miles from the proposed site with an estimated 10 year construction period.
- The M4 motorway, a 70mph extremely busy road is a mere 0.58 miles from the proposed site.
- Junction 28 of the M4 which constitutes an area were several major roads converge is a mere 0.82 miles from the proposed site.

The UK National figures released by the Department of Transport (2011), the latest figures released, is 5,907 deaths or serious injuries with a further 20,291 people being slightly injured. Furthermore, the Department of Transport (2011) also state that a child is struck by a vehicle travelling at a speed of up to 40 mph, 9/10 accidents result in the person being killed.

Risk assessment

Carrying out a risk assessment on the probability of a child (or adult) being involved in a road traffic accident, taking into consideration the close proximity of the existing and proposed significant
development to the M4 and Southern Distributer Road, along with the existing A45, added to the issues of no pavements and poor lighting in the immediate vicinity of the proposed site, the probability of an accident is HIGH (score 4 on the risk table) or VERY HIGH (score 5 on the risk table). The likely impact of a child being involved in a road traffic accident even on the lowest of the speed limits highlighted (40 mph), by a commercial vehicle is VERY HIGH (score of 5).

Therefore the risk of a fatality due to a child or adult being hit by a commercial vehicle, if the Gypsy Traveller site is situated at Celtic Way, is shown on the risk assessment grid of being between 20 and 25, 25 being the HIGHEST POSSIBLE SCORE. A risk which falls into the red area of the risk table requires IMMEDIATE ACTION.

RAILWAY

A third safety issues that needs to be raised in relation to the proposed Gypsy Traveller Site if it were to be situated in Celtic Way is the danger from the railway lines in the area (see appendix four).

It is important to note that:

- The railway line is a mere 0.58 of a mile from the proposed site.
- There are plans to develop the railway with electrification of the line.
- There are plans to develop the railway network in the area with a proposed station for the Coed Kernew area identified within the life of the Local Development Plan.

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Network Rail describes The Great Western Main line as ‘one of the country’s most important arterial routes, linking London to Wales’. The Project Environmental Statement Wales (2013) outlines the plans for electrification between the Severn Tunnel and the Canton Depot in Cardiff.

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Risk assessment

Carrying out a risk assessment, with the main railway line only half a mile from the proposed site, the probability of a child (or adult) being injured by a train Medium (score of 3 on the risk table), this risk rises to High (score of 4 on the risk table) with the electrification of the line.

The likely impact of a child (or adult) being hit by a train resulting in death occurring is VERY HIGH (score 5 on the risk table).

Therefore, the risk of a fatality of a child (or adult) being hit by a train, if the transit Gypsy Traveller site is situated in Celtic Way, half a mile from the railway line is shown to be between 15 and 20. A risk which falls into the red area of the risk table requires IMMEDIATE ACTION.
A fourth safety issue that requires due consideration with the proposed Transit Gypsy and Traveller Site being situated in Celtic Way is the close proximity to the Electricity Substation.

The Western Power Distribution Network serves Wales, the South West and the Midlands. It has a National Grid conveying electricity at 275,000 or 400,000 volts which is reduced to 132,000 volts for regional distribution at substations or grid supply points. The electricity is further disseminated to substations where it is reduced via a transformer to 230 volts to be distributed to towns etc. The Western Power Distribution Network reported having 185,000 such transformers in 2013.

It is therefore important to note that:
• The substation is a mere distance of 0.28 meters from the proposed site.
• The substation is in an area whereby there is no organised surveillance and therefore if a child (or adult) inadvertently entered the danger area it may well go unnoticed.

Every year 1,000 contacts are made with energized high voltage power lines, equipment or electrical substations each year, according to the Electric Power Generation, Transmission and Distribution Safety figures (2012). Some of these contacts have resulted in very serious injury requiring intensive care hospitalisation or death.

Risk assessment
Carrying out a risk assessment, with electricity substation being situated a mere 0.28 meters from the proposed transit site, the probability of a child (or adult) making a ‘contact’ with the substation is Medium (score of 3 on the risk table). The likely impact of a child or adult dying as a result of making ‘contact’ with the electricity sub-station is VERY HIGH (score 5 on the risk table).

Therefore, the risk of a fatality due ‘contact’ with the electricity substation, if the transit Gypsy Traveller site is situated in Celtic Way, 0.28 meters from the substation, is shown to be 15. A risk which falls into the red area of the risk table - highest possible risk - requires IMMEDIATE ACTION.

WILD ANIMAL HAZARDS

According to the University of Bristol's Mammal Research Unit, the red fox population in the UK is estimated to be 225,000 in rural areas and 33,000 in urban areas, with the highest fox densities being found in cities (2010). The hazard of foxes has been highlighted recently with twin girls being bitten in 2010 and a baby boy being reported as having been attacked in 2013 and a child in Bromley (London) being bitten this year (BBC 2013). The University of Bristol suggest that foxes pose a risk, but not a significant risk by acknowledging that biting incidents are rare, they however also raise the issue of that foxes carry a range of diseases.

Risk assessment
Carrying out a risk assessment, with the large fox population in the UK, the probability of a child (or adult) being coming into contact with a fox is Low (score of 2 on the risk table). The likely impact of a child (or adult) being injured or contracting an illness from a fox is 3 MEDIUM (score 3 on the risk table).

Therefore, the risk of an injury or illness from an encounter with a fox is shown to be 6. A risk which falls into the amber area of the risk table requires ACTION to reduce the risk.

CONCLUSION

As a health professional, I feel duty bound to highlight to Newport Council Planning Department that the land on Celtic Way, which has been proposed for a transit Gypsy Traveller site, is probably ONE OF THE MOST DANGEROUS PIECES OF LAND IN NEWPORT.

I am so concerned about this proposal that I have decided to take the steps of sending this letter to you be recorded delivery to ensure that you definitely receive it, this will give us some piece of mind. I feel that the risk associated with the open water in the area is such an important issue that it is necessary for us to lobby our local councillors, MPs and AMs as well as the Welsh Government itself to amend the National Guidance on Gypsy and Travellers to ensure that ALL proposed sites in Wales are placed) a suitably safe distance from open unmanaged lakes and pools.

Having IDENTIFIED the UNACCEPTABLE RISK to children (and adults) of the proposals in the Revised Deposit Plan, I feel that the proposed Gypsy Traveller site being located at Celtic Way, on the
basis of safety, taking account of the water, road, rail, electrical and wildlife risk assessments undertaken, you MUST TAKE ACTION and REMOVE THIS SITE from the proposal document BEFORE A CHILD DIES - God forbid. Continuing with the current Deposit Plan and locating the proposed Transit Gypsy and Traveller site on Celtic Way is an accident waiting to happen.

I am satisfied that following receipt of this letter, the Newport Council Planning department have been warned of the overwhelming risks of using probably one of the most dangerous pieces of land in Newport for the proposed Transit Gypsy and Traveller site. I am asking the Council: PLEASE DO NOT ALLOW A CHILD TO DIE NEEDLESSLY.

Item Question Council Responses

13    Council Response

The proposal is for a transit site providing temporary short-term accommodation, rather than a permanent place to live. In this context, the adjacent land uses to the Celtic Way site are not considered to be hazardous, however it is agreed that they are not suitable places for children to play. The indicative layout of the transit site will include green areas for play and therefore children will have onsite facilities.

The site will be designed as a transit site and therefore only used by Gypsy/Travellers on a temporary basis as they pass through Newport. It is expected that the Gypsy/Travellers will use their vehicles to move around and there will be limited activity in terms of moving around the area on foot. Therefore the fact there is poor street lighting and a lack of pavement is not considered to be a significant concern. Increased street lighting could be provided if Members consider it to be essential.

Development alongside water can enhance the setting of an area. Safety around lakes is something that children from all cultures need to be aware of and is not considered an obstacle to development.

There are numerous homes within Newport which are within 0.5 miles of a railway line.

The substation is fenced in and secure.

Any risk from urban foxes is applicable across all urban areas of Newport and is not considered to be a major concern that will affect the delivery of the site.

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
Representation Details

by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M

Rep'n/Para/Policy  Representer  Agent  Accession No  Date Lodged  Late?  Source  Type  Mode  Status  Status Modified
3933.L1//H15  Middleton, Mr Richard

Document: Revised LDP, p.75
Policy: H15
Summary: Objection on proposed Gypsy and Traveller site at Celtic Way.

Additional material submitted - Please click here
I am writing to log my objection to the proposed transit Gypsy Traveller Site at Celtic Way on the grounds of Health and Safety (Newport Local Development Plan 2011B26/ Revised Deposit Plan).

The Welsh Government state clearly in their document ‘Designing Gypsy and Traveller Sites Good Practice Guide (2008), in section 3.3: ‘It is essential to ensure that the location ofa site will provide a safe environment for the residents. Sites should not be situated near refuse sites, industrial processes or other hazardous places, as this will obviously have a detrimental effect on the general health and wellbeing of the residents and pose particular safety risks for young children. All prospective site locations should be considered carefully before any decision is taken to proceed, to ensure that the health and safety of prospective residents are not at risk.’ Clearly safety is of key importance.

Similarly in the Welsh Governments ‘A Road Less Travelled - A Draft GypsyTraveller Strategy Consultation Document’ clearly state that health and safety requirements including the safety of play areas are of high importance.

I am therefore absolutely amazed and horrified on this basis, that Newport Council in their Revised Deposit Plan (June 2013) as part of their Local Development Plan, have actively chosen to site the proposed transit Gypsy Traveller Site at Celtic Way (see appendix one), which has to constitute probably one of the most dangerous pieces of land in Newport.

**OPEN WATER**

The proposed site is situated in an area known as Celtic Lakes; it gets its name from the thirteen areas of open water or lakes in the immediate vicinity of the proposed transit Gypsy Traveller Site at Celtic Way (see appendix two). It is therefore important to note that:

1. There are thirteen separate areas of open water or lakes in the immediate vicinity of the proposed Gypsy Traveller Site (see appendix one).
2. These thirteen lakes give a combined total surface area of water of 38,276 square metres.
3. The lakes range from the largest with a surface area of 8,376 square meters to the smallest with a surface area of 890 square meters.
4. To give some perspective on the scale of the open water in the area, the total surface area of water from these lakes is nearly double the total ground area of the proposed Traveller site, which is in the region of 24,564 square meters or 6.07 acres.
5. The nearest lake is just 22 metres from the site, again to put this into perspective, the average family car being just under 5 meters long, this means that the open water is between 4 to 5 car lengths from the proposed Traveller site.
6. Also the nearest lake to the proposed site is one of the largest of the lakes and has a surface water area of 6,070 square meters.
7. The furthest lake is a mere 680 metres, but five of the lakes are only between 200 and 350 metres from the proposed site.
8. Within 402 meters I X mile of the proposed site there is a total of 15,577 square meters of surface water or lakes which equates to 3.85 acres.
9. Within 804 metres I X mile there is at total of 38,276 square meters of surface water or lakes which equates to 9.46 acres.
10. All of the lakes are VERY CLOSE to the proposed Traveller site, they are not enclosed, there are no warning signs in place and no buoyancy aids for first aid purposes.
11. As well as these identified lakes there is a myriad of water ways including reanes and drainage ditches with very steep sides, therefore a child falling into one of these ditches may not be able to climb back out.
12. The reanes and ditches equate to approximately 5,760 metres or 3.6 miles of waterways within X a mile from the proposed site (See appendix 3).
13. There are no street lights in this area which means that the area is very poorly lit, this significantly increases the risk of a child falling into one of these areas of open water and drowning.

The Environment Agency UK(2006) reported that drowning is the third most common cause of accidental death among young people in England, Wales and Northern Ireland, with average of 300 such deaths each year. The agency also states that the highest death toll within inland areas of water is attributed to drainage control ditches in urban sites. Furthermore, the Environment Agency UK(2006) goes on to say that two of the most significant causes of drowning are due to ‘unfamiliar surroundings’ and an ‘inability for the person to save themselves or be rescued’.

The National Water Safety Forum Ukfigures released for 2011 (the latest available) for cases of drowning, showed that 701 people drowned in 2011, of those approximately a third (n=247) drowned in inland water, such as that at Celtic Way. There is also a significant risk during winter months for areas of open water when the water freezes over, with children and adults falling through the ice and dying.

For those children who fall into water and don't drown, the Swimming Pool Amendment Bill (2009) states that 20% are left with ‘debilitating injuries that will carry on for the rest of their lives….many of these injuries are brain related and incurable’. One further issue to consider according to the Environment Agency UK(2006) are the ill-health risks associated with a person having been in water of this nature.
It is pertinent that during this consultation process, the RLSS UKCardiff Branch, featured on the BBC breakfast show on July 14th highlighting that there have been four deaths in the week preceding the broadcast, all of which had occurred in lakes and pools. Also between the 14th and 20th of July the BBC have reported a further 6 deaths from drowning in inland open water, three of which were in Wales and two of them in South Wales. Furthermore, the UK Fire Brigade (2012) report in section 11 of the Fire and Rescue Services Act that the fire brigade is "required to equip themselves for dealing with eventualities (other than fires) which pose a threat to human life or endanger animals" because they report that in the UK about 4,000 to 5,000 large animal rescue operations each year. There is the potential for ponies to fall into the lakes or ditches in this area and being unable to get back out.

Risk assessment

Carrying out a risk assessment, with a surface area of water of 38,276 from the thirteen lakes and 3.6 miles of reanes and drainage ditches the probability of a child falling into one of these areas of water is VERY HIGH (score of 5 on the risk table).

The likely impact of a child drowning in the water surrounding the proposed site is a HIGH (score 4 on the risk table), escalated to VERY HIGH (score 5 on the risk table) due to the nature of the transit site with children only staying for a two week period and therefore not familiar with the surroundings including the thirteen lakes and myriad of reanes and drainage ditches surrounding the proposed site.

Therefore, the risk of a fatality due to drowning, if the transit Gypsy Traveller site is situated in Celtic Way, adjacent to thirteen lakes and a myriad of reanes and drainage ditches, is shown to be 25, THE HIGHEST POSSIBLE RISK. A risk which falls into the red area of the risk table - highest possible risk requires IMMEDIATE ACTION.

ROAD NETWORK

A second safety issues that needs to be raised in relation to the proposed Gypsy Traveller Site if it were to be situated in Celtic Way is the danger from the road network in the area (see appendix four). Again The Welsh Government state clearly in their document 'Designing Gypsy and Traveller SitesGood Practice Guide (2008) in section 3.10, that 'Sites adjacent to light industrial areas therefore tend not to be popular because of... safety fears (when walking home at night for instance).'

It is important to note that:

• The proposed site is situated in a commercial/business / light industrial area.
• There is no pavement access to the proposed site meaning that pedestrians would have to walk on the road to access any local amenities including school, bus stop, shop et.
• The road access to the proposed site is in an industrial area, therefore there will be a significant number of commercial type vehicles in the immediate including vans, trucks and lorries.
• Due to the nature of the area being a business or commercial area the commercial vehicles will be accessing the immediate area both day and night.
• There are no lampposts in the immediate vicinity of the proposed site therefore the area is very poorly lit.
• The road access to the proposed site at Celtic Way is a 40mph road.
• The A48, a 40 or 50 mph road is a mere 0.34 miles from the proposed site.
• The planned extensive development to link up with the Southern Distributor Road, a 50mph very busy road, is a mere 0.38 miles from the proposed site which is due to be completed within the life of the local Development Plan.
• The M4 relief road proposed location is 0.44 miles from the proposed site with an estimated 10 year construction period.
• The M4 motorway, a 70mph extremely busy road is a mere 0.58 miles from the proposed site.
• Junction 28 of the M4 which constitutes an area where several major roads converge is a mere 0.82 miles from the proposed site.

The UK National figures released by the Department of Transport (2011), the latest figures released, is 5,907 deaths or serious injuries with a further 20,291 people being slightly injured. Furthermore, the Department of Transport (2011) also state that a child is struck by a vehicle travelling at a speed of up to 40 mph, 9/10 accidents result in the person being killed.

Risk assessment

Carrying out a risk assessment on the probability of a child (or adult) being involved in a road traffic accident, taking into consideration the close proximity of the existing and proposed significant
Development to the M4 and Southern Distributer Road, along with the existing A45, added to the issues of no pavements and poor lighting in the immediate vicinity of the proposed site, the probability of an accident is HIGH (score 4 on the risk table) or VERY HIGH (score 5 on the risk table). The likely impact of a child being involved in a road traffic accident even on the lowest of the speed limits highlighted (40 mph), by a commercial vehicle is VERY HIGH (score of 5).

Therefore the risk of a fatality due to a child or adult being hit by a commercial vehicle, if the Gypsy Traveller site is situated at Celtic Way, is shown on the risk assessment grid of being between 20 and 25, 25 being the HIGHEST POSSIBLE SCORE. A risk which falls into the red area of the risk table requires IMMEDIATE ACTION.  

RAILWAY

A third safety issues that needs to be raised in relation to the proposed Gypsy Traveller Site if it were to be situated in Celtic Way is the danger from the railway lines in the area (see appendix four).

It is important to note that:

• The railway line is a mere 0.58 of a mile from the proposed site.
• There are plans to develop the railway with electrification of the line.
• There are plans to develop the railway network in the area with a proposed station for the Coed Kernew area identified within the life of the Local Development Plan.

The Rail Safety and Standards Board (2011) recorded 3,400 incidents of trespass and vandalism on UK railway lines during the 2009-2010 period. Also in 2011 there were 50 deaths from people trespassing on train lines and 400 near misses.

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Risk assessment

Carrying out a risk assessment, with the main railway line only half a mile from the proposed site, the probability of a child (or adult) being injured by a train Medium (score of 3 on the risk table), this risk rises to High (score of 4 on the risk table) with the electrification of the line.

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ELECTRICITY SUBSTATION
A fourth safety issue that requires due consideration with the proposed Transit Gypsy and Traveller Site being situated in Celtic Way is the close proximity to the Electricity Substation.

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It is therefore important to note that:

- The substation is a mere distance of 0.28 meters from the proposed site.
- The substation is in an area whereby there is no organised surveillance and therefore if a child (or adult) inadvertently entered the danger area it may well go unnoticed.

Every year 1,000 contacts are made with energized high voltage power lines, equipment or electrical substations each year, according to the Electric Power Generation, Transmission and Distribution Safety figures (2012). Some of these contacts have resulted in very serious injury requiring intensive care hospitalisation or death.

Risk assessment

Carrying out a risk assessment, with electricity substation being situated a mere 0.28 meters from the proposed transit site, the probability of a child (or adult) making a ‘contact’ with the substation is Medium (score of 3 on the risk table).

The likely impact of a child or adult dying as a result of making ‘contact’ with the electricity sub-station is VERY HIGH (score 5 on the risk table).

Therefore, the risk of a fatality due ‘contact’ with the electricity substation, if the transit Gypsy Traveller site is situated in Celtic Way, 0.28 meters from the substation, is shown to be 15. A risk which falls into the red area of the risk table - highest possible risk - requires IMMEDIATE ACTION.

WILD ANIMAL HAZARDS

According to the University of Bristol's Mammal Research Unit, the red fox population in the UK is estimated to be 225,000 in rural areas and 33,000 in urban areas, with the highest fox densities being found in cities (2010). The hazard of foxes has been highlighted recently with twin girls being bitten in 2010 and a baby boy being reported as having been attacked in 2013 and a child in Bromley (London) being bitten this year (BBC 2013). The University of Bristol suggest that foxes pose a risk, but not a significant risk by acknowledging that biting incidents are rare, they however also raise the issue of that foxes carry a range of diseases.

Risk assessment

Carrying out a risk assessment, with the large fox population in the UK, the probability of a child (or adult) being coming into contact with a fox is Low (score of 2 on the risk table). The likely impact of a child (or adult) being injured or contracting an illness from a fox is 3 MEDIUM (score 3 on the risk table).

Therefore, the risk of an injury or illness from an encounter with a fox is shown to be 6. A risk which falls into the amber area of the risk table requires ACTION to reduce the risk.

CONCLUSION

As a health professional, I feel duty bound to highlight to Newport Council Planning Department that the land on Celtic Way, which has been proposed for a transit Gypsy Traveller site, is probably ONE OF THE MOST DANGEROUS PIECES OF LAND IN NEWPORT.

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Item Question Council Responses

13 Council Response

Business – It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

Location and Design – The proposal is for a transit site providing temporary short-term accommodation, rather than a permanent place to live. In this context, the adjacent land uses to the Celtic Way site are not considered to be hazardous, however it is agreed that they are not suitable places for children to play. The indicative layout of the transit site will include green areas for play and therefore children will have onsite facilities.

24/7 access of HGV/movement of employees – The site will be designed as a transit site and therefore only used by Gypsy/Travellers on a temporary basis as they pass through Newport. It is expected that the Gypsy/Travellers will use their vehicles to move around and there will be limited activity in terms of moving around the area on foot. Therefore the fact there is poor street lighting and a lack of pavement is not considered to be a significant concern. Increased street lighting could be provided if Members consider it to be essential.

Cardiff to Newport dual carriageway is within 0.5 miles – The fact a main transport route is in close proximity to the site is considered more of an asset than a safety risk. There are numerous homes within Newport which are within 0.5 miles of a dual carriageway or motorway.

Electricity Sub Station within 0.3 miles – The substation is fenced in and secure.

Railway within 0.5 miles – There are numerous homes within Newport which are within 0.5 miles of a railway line.

Proximity to Celtic Lakes – Development alongside water can enhance the setting of an area. Safety around lakes is something that children from all cultures need to be aware of and is not considered an obstacle to development.

Construction site for new M4 – The Council has safeguarded an area of land for the new M4. Welsh Government has not raised the proximity of the site to the new M4 as an issue.

Police/Crime/Perception of Crime – As with any other significant development, the Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.

Education – As this site will only be a transit site for Gypsy/Travellers to temporarily stay, it is unlikely they will seek school places for their children.

Environment – The transit site will be clearly defined, maintained and managed. Any unauthorised expansion onto the SSSI is likely to be dealt with swiftly with Police action, who will be able to move on unauthorised encampments once the Council has a transit site.

Alternative Sites – Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

House Prices – The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.
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Document: Revised LDP, p.75
Policy: H15.01
Summary: Object to proposed Gypsy and Traveller site at Celtic Way

Additional material submitted - Please click here
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5. The nearest lake is just 22 metres from the site, again to put this into perspective, the average family car being just under 5 meters long, this means that the open water is between 4 to 5 car lengths from the proposed Traveller site.
6. Also the nearest lake to the proposed site is one of the largest of the lakes and has a surface water area of 6,070 square meters.
7. The furthest lake is a mere 680 metres, but five of the lakes are only between 200 and 350 metres from the proposed site.
8. Within 402 meters I X mile of the proposed site there is a total of 15,577 square meters of surface water or lakes which equates to 3.85 acres.
9. Within 804 metres I X mile there is at total of 38,276 square meters of surface water or lakes which equates to 9.46 acres.
10. All of the lakes are VERY CLOSE to the proposed Traveller site, they are not enclosed, there are no warning signs in place and no buoyancy aids for first aid purposes.
11. As well as these identified lakes there is a myriad of water ways including reanes and drainage ditches with very steep sides, therefore a child falling into one of these ditches may not be able to climb back out.
12. The reanes and ditches equate to approximately 5,760 metres or 3.6 miles of waterways within X a mile from the proposed site (See appendix 3).
13. There are no street lights in this area which means that the area is very poorly lit, this significantly increases the risk of a child falling into one of these areas of open water and drowning.

The Environment Agency UK(2006) reported that drowning is the third most common cause of accidental death among young people in England, Wales and Northern Ireland, with average of 300 such deaths each year. The agency also states that the highest death toll within inland areas of water is attributed to drainage control ditches in urban sites. Furthermore, the Environment Agency UK(2006) goes on to say that two of the most significant causes of drowning are due to ‘unfamiliar surroundings’ and an ‘inability for the person to save themselves or be rescued’.

The National Water Safety Forum UKfigures released for 2011 (the latest available) for cases of drowning, showed that 701 people drowned in 2011, of those approximately a third (n=247) drowned in inland water, such as that at Celtic Way. There is also a significant risk during winter months for areas of open water when the water freezes over, with children and adults falling through the ice and dying.

For those children who fall into water and don't drown, the Swimming Pool Amendment Bill (2009) states that 20% are left with ‘debilitating injuries that will carry on for the rest of their lives....many of these injuries are brain related and incurable’. One further issue to consider according to the Environment Agency UK(2006) are the ill-health risks associated with a person having been in water of this nature.
It is pertinent that during this consultation process, the RLSS UKCardiff Branch, featured on the BBC breakfast show on July 14th highlighting that there have been four deaths in the week preceding the broadcast, all of which had occurred in lakes and pools. Also between the 14th and 20th of July the BBC have reported a further 6 deaths from drowning in inland open water, three of which were in Wales and two of them in South Wales.

Furthermore, the UK Fire Brigade (2012) report in section 11 of the Fire and Rescue Services Act that the fire brigade is “required to equip themselves for dealing with eventualities (other than fires) which pose a threat to human life or endanger animals” because they report that in the UK about 4,000 to 5,000 large animal rescue operations each year. There is the potential for ponies to fall into the lakes or ditches in this area and being unable to get back out.

Risk assessment

Carrying out a risk assessment, with a surface area of water of 38,276 from the thirteen lakes and 3.6 miles of reanes and drainage ditches the probability of a child falling into one of these areas of water is VERY HIGH (score of 5 on the risk table). The likely impact of a child drowning in the water surrounding the proposed site is a HIGH (score 4 on *) the risk table), escalated to VERY HIGH (score 5 on the risk table) due to the nature of the transit site with children only staying for a two week period and therefore not familiar with the surroundings including the thirteen lakes and myriad of reanes and drainage ditches surrounding the proposed site.

Therefore, the risk of a fatality due to drowning, if the transit Gypsy Traveller site is situated in Celtic Way, adjacent to thirteen lakes and a myriad of reanes and drainage ditches, is shown to be 25, THE HIGHEST POSSIBLE RISK. A risk which falls into the red area of the risk table - highest possible risk requires IMMEDIATE ACTION.

ROAD NETWORK

A second safety issues that needs to be raised in relation to the proposed Gypsy Traveller Site if it were to be situated in Celtic Way is the danger from the road network in the area (see appendix four). Again The Welsh Government state clearly in their document 'Designing Gypsy and Traveller Sites Good Practice Guide (2008) in section 3.10, that 'Sites adjacent to light industrial areas therefore tend not to be popular because of... safety fears (when walking home at night for instance).'

It is important to note that:

• The proposed site is situated in a commercial/business / light industrial area.
• There is no pavement access to the proposed site meaning that pedestrians would have to walk on the road to access any local amenities including school, bus stop, shop et.
• The road access to the proposed site is in an industrial area, therefore there will be a significant number of commercial type vehicles in the immediate including vans, trucks and lorries.
• Due to the nature of the area being a business or commercial area the commercial vehicles will be accessing the immediate area both day and night.
• There are no lampposts in the immediate vicinity of the proposed site therefore the area is very poorly lit.
• The road access to the proposed site at Celtic Way is a 40mph road.
• The A48, a 40 or 50 mph road is a mere 0.34 miles from the proposed site.
• The planned extensive development to link up with the Southern Distributor Road, a 50mph very busy road, is a mere 0.38 miles from the proposed site which is due to be completed within the life of the local Development Plan.
• The M4 relief road proposed location is 0.44 miles from the proposed site with an estimated 10 year construction period.
• The M4 motorway, a 70mph extremely busy road is a mere 0.82 miles from the proposed site.
• Junction 28 of the M4 which constitutes an area were several major roads converge is a mere 0.82 miles from the proposed site.

The UK National figures released by the Department of Transport (2011), the latest figures released, is 5,907 deaths or serious injuries with a further 20,291 people being slightly injured. Furthermore, the Department of Transport (2011) also state that a child is struck by a vehicle travelling at a speed of up to 40 mph, 9/10 accidents result in the person being killed.

Risk assessment

Carrying out a risk assessment on the probability of a child (or adult) being involved in a road traffic accident, taking into consideration the close proximity of the existing and proposed significant development to the M4 and Southern Distributer Road, along with the existing A45, added to the issues of no pavements and poor lighting in the immediate vicinity of the proposed site, the probability of
an accident is HIGH (score 4 on the risk table) or VERY HIGH (score 5 on the risk table). The likely impact of a child being involved in a road traffic accident even on the lowest of the speed limits highlighted (40 mph), by a commercial vehicle is VERY HIGH (score of 5).

Therefore the risk of a fatality due to a child or adult being hit by a commercial vehicle, if the Gypsy Traveller site is situated at Celtic Way, is shown on the risk assessment grid of being between 20 and 25, 25 being the HIGHEST POSSIBLE SCORE. A risk which falls into the red area of the risk table requires IMMEDIATE ACTION.

RAILWAY

A third safety issue that needs to be raised in relation to the proposed Gypsy Traveller Site if it were to be situated in Celtic Way is the danger from the railway lines in the area (see appendix four).

It is important to note that:

• The railway line is a mere 0.58 of a mile from the proposed site.
• There are plans to develop the railway with electrification of the line.
• There are plans to develop the railway network in the area with a proposed station for the Coed Kernew area identified within the life of the Local Development Plan.

The Rail Safety and Standards Board (2011) recorded 3,400 incidents of trespass and vandalism on UK railway lines during the 2009-2010 period. Also in 2011 there were 50 deaths from people trespassing on train lines and 400 near misses.

Network Rail (2013) report that 49 people died in the UK between April 1st 2012 and March 31st 2013 whilst trying to cross railway lines, they reported that "Unlike cars, trains cannot swerve and can take the length of 20 football pitches to stop.". Network rail also reported that in 2013 there were 60 reports of children playing "chicken" with trains, more than 80 incidents of graffiti and more than 1,000 reports of stone throwing at trains. As well as the danger to the people who trespass onto the train line, Network rail report the enormous danger to train passengers themselves with a recorded 76 shopping trolleys, 180 bikes, 7 prams and one bouncy castle being placed on train lines during 2012.

Network Rail describes The Great Western Main line as 'one of the country's most important arterial routes, linking London to Wales'. The Project Environmental Statement Wales (2013) outlines the plans for electrification between the SevernTunnel and the Canton Depot in Cardiff.

In their safety leaflet ‘Rail Life’ (2012), Network Rail outlines that as well as walking on an electrified line can cause immediate death; the electricity can also cause serious injuries in other ways. The safety information states that electricity can arc like lightning or 'jump' up to three metres so a person can be electrocuted by flying a kite near or touching things in contact with overhead lines. It also cites the case of a young girl who was playing on a bridge over the railway track when she found a metal pole and pushed it through a hole in the bridge fencing, the pole made contact with 25,000 volts of electricity in the overhead line. The young girl was reported to have been badly burnt and scarred for life.

Risk assessment

Carrying out a risk assessment, with the main railway line only half a mile from the proposed site, the probability of a child (or adult) being injured by a train Medium (score of 3 on the risk table), this risk rises to High (score of 4 on the risk table) with the electrification of the line.

The likely impact of a child (or adult) being hit by a train resulting in death occurring is VERY HIGH (score 5 on the risk table).

Therefore, the risk of a fatality of a child (or adult) being hit by a train, if the transit Gypsy Traveller site is situated in Celtic Way, half a mile from the railway line is shown to be between 15 and 20. A risk which falls into the red area of the risk table requires IMMEDIATE ACTION.

ELECTRICITY SUBSTATION

A fourth safety issue that requires due consideration with the proposed Transit Gypsy and Traveller Site being situated in Celtic Way is the close proximity to the Electricity Substation.
The Western Power Distribution Network serves Wales, the South West and the Midlands. It has a National Grid conveying electricity at 275,000 or 400,000 volts which is reduced to 132,000 volts for regional distribution at substations or grid supply points. The electricity is further disseminated to substations where it is reduced via a transformer to 230 volts to be distributed to towns etc. The Western Power Distribution Network reported having 185,000 such transformers in 2013.

It is therefore important to note that:
• The substation is a mere distance of 0.28 meters from the proposed site.
• The substation is in an area whereby there is no organised surveillance and therefore if a child (or adult) inadvertently entered the danger area it may well go unnoticed.

Every year 1,000 contacts are made with energized high voltage power lines, equipment or electrical substations each year, according to the Electric Power Generation, Transmission and Distribution Safety figures (2012). Some of these contacts have resulted in very serious injury requiring intensive care hospitalisation or death.

Risk assessment
Carrying out a risk assessment, with electricity substation being situated a mere 0.28 meters from the proposed transit site, the probability of a child (or adult) making a 'contact' with the substation is Medium (score of 3 on the risk table). The likely impact of a child or adult dying as a result of making 'contact' with the electricity substation is VERY HIGH (score 5 on the risk table).

Therefore, the risk of a fatality due 'contact' with the electricity substation, if the transit Gypsy Traveller site is situated in Celtic Way, 0.28 meters from the substation, is shown to be 15. A risk which falls into the red area of the risk table - highest possible risk - requires IMMEDIATE ACTION.

WILD ANIMAL HAZARDS

According to the University of Bristol's Mammal Research Unit, the red fox population in the UK is estimated to be 225,000 in rural areas and 33,000 in urban areas, with the highest fox densities being found in cities (2010). The hazard of foxes has been highlighted recently with twin girls being bitten in 2010 and a baby boy being reported as having been attacked in 2013 and a child in Bromley (London) being bitten this year (BBC 2013). The University of Bristol suggest that foxes pose a risk, but not a significant risk by acknowledging that biting incidents are rare, they however also raise the issue of that foxes carry a range of diseases.

Risk assessment
Carrying out a risk assessment, with the large fox population in the UK, the probability of a child (or adult) being coming into contact with a fox is Low (score of 2 on the risk table). The likely impact of a child (or adult) being injured or contracting an illness from a fox is 3 MEDIUM (score 3 on the risk table).

Therefore, the risk of an injury or illness from an encounter with a fox is shown to be 6. A risk which falls into the amber area of the risk table requires ACTION to reduce the risk.

CONCLUSION
As a health professional, I feel duty bound to highlight to Newport Council Planning Department that the land on Celtic Way, which has been proposed for a transit Gypsy Traveller site, is probably ONE OF THE MOST DANGEROUS PIECES OF LAND IN NEWPORT.

I am so concerned about this proposal that I have decided to take the steps of sending this letter to you be recorded delivery to ensure that you definitely receive it, this will give us some piece of mind. I feel that the risk associated with the open water in the area is such an important issue that it is necessary for us to lobby our local councillors, MPs and AMs as well as the Welsh Government itself to amend the National Guidance on Gypsy and Travellers to ensure that ALL proposed sites in Wales are placed ) a suitably safe distance from open unmanaged lakes and pools.

Having IDENTIFIED the UNACCEPTABLE RISK to children (and adults) of the proposals in the Revised Deposit Plan, I feel that the proposed Gypsy Traveller site being located at Celtic Way, on the basis of safety, taking account of the water, road, rail, electrical and wildlife risk assessments undertaken, you MUST TAKE ACTION and REMOVETHIS SITE from the proposal document BEFORE A
CHILD DIES - God forbid. Continuing with the current Deposit Plan and locating the proposed Transit Gypsy and Traveller site on Celtic Way is an accident waiting to happen. I am satisfied that following receipt of this letter, the Newport Council Planning department have been warned of the overwhelming risks of using probably one of the most dangerous pieces of land in Newport for the proposed Transit Gypsy and Traveller site. I am asking the Council: PLEASE DO NOT ALLOW A CHILD TO DIE NEEDLESSLY.

The proposal is for a transit site providing temporary short-term accommodation, rather than a permanent place to live. In this context, the adjacent land uses to the Celtic Way site are not considered to be hazardous, however it is agreed that they are not suitable places for children to play. The indicative layout of the transit site will include green areas for play and therefore children will have onsite facilities. The site will be designed as a transit site and therefore only used by Gypsy/Travellers on a temporary basis as they pass through Newport. It is expected that the Gypsy/Travellers will use their vehicles to move around and there will be limited activity in terms of moving around the area on foot. Therefore the fact there is poor street lighting and a lack of pavement is not considered to be a significant concern. Increased street lighting could be provided if Members consider it to be essential.

Development alongside water can enhance the setting of an area. Safety around lakes is something that children from all cultures need to be aware of and is not considered an obstacle to development.

There are numerous homes within Newport which are within 0.5 miles of a railway line.

The substation is fenced in and secure.

Any risk from urban foxes is applicable across all urban areas of Newport and is not considered to be a major concern that will affect the delivery of the site.

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
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<th>Agent</th>
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Document: Revised LDP, p.75

Policy: General G&T

Summary: Support the Plan with particular reference to Gypsy and Traveller sites.

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<th>Representation Text</th>
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<td>11</td>
<td>Representation</td>
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<td>Having been made aware of the revisions to the above plan and in particular reference to the location of the Gypsy Traveller sites as set out in the plan, is acceptable, and I accept and approve the Revised Deposit Local Development Plan.</td>
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<th>Item Question</th>
<th>Council Responses</th>
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<td>13</td>
<td>Council Response</td>
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<td></td>
<td>Support noted.</td>
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</table>
**Item Question**

However, further improvement could be made to the Plan in protecting Langstone from further major development by adding the Countryside north of the A48 that is outside of the boundary settlement, up to and including Old Roman Road, and designate it as a ‘Special Landscaped Area.’

**Council Response**

The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales’ guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.
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Document: Revised LDP, p.75  
Policy: General G&T  
Summary: Support the Proposed Gypsy and Traveller allocations.

**Item Question**  
**Representation Text**

11  
Re-consultation response to revised deposit Local Development Plan, June 2013.  
With reference to the location of the Gypsy and Traveller sites, as set out in the plan recently revised.  
We accept and approve the revised deposit local development plan.

**Item Question**  
**Council Responses**

13  
Council Response  
Support noted.
**Representation Details**

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Document: Revised LDP, p.22  
Policy: SP08  
Summary: Extend SLA boundary north of Langstone.

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<td>11</td>
<td>However protecting Langstone Village from further major development by adding the countryside north of the A48 and including Old Roman Road, and designating it as a special landscaped area, would be further improvement.</td>
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| 13            | The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales' guidance.  
Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan. |
It was our intention to make our formal objections and comments regarding the above, via your official council website as advised, following the recent consultation meetings with yourself, elected Councillors and our local community. However, the difficulties we experienced in using your site and the inexcusable deficiencies of the site to allow the user to complete the comments procedure and submit the same to you, has left us no choice but to spend further (valuable) hours in drafting this letter. We wish to voice our formal objections to the proposed Gypsy and Traveller Transit Site at Celtic Way Coedkernew as detailed in the Newport Local Development Plan 2011B26, Revised Deposit Plan June 2013.

Our objections are thus:

The Welsh Assembly Government document (designing Gypsy and Traveller sites good practice guide 2008) states that sites should not be situated near Industrial processes or other hazardous places, to ensure prospective residents are not placed at risk. The proposed site at Celtic Way is in the middle of an Industrial Business Park, where as you must be aware, manufacturing processes and logistics operations utilising heavy goods vehicles are performed on a daily basis.

Additionally, the dearth of safe walkways and pavements through this dangerous area must be a major cause for concern for the safety of a transit population situated within this area. Relating to this, we would also draw your attention to the dangerous aspect of multiple bodies of open water surrounding the proposed site and the extensive network of renes and drainage ditches in the locality.

Furthermore, increased occurrence of slow moving caravans and trailers manoeuvring within this area combined with the construction traffic that will come about due to the SDR extension and the M4 relief road, will increase the risk of road traffic accidents in the locality, a potential hazard to all residents in the area.

We, as residents, are very much aware of the tremendous financial resources and very successful planning strategies that NCC and The Welsh Assembly Government have invested in Celtic Springs and The Imperial Park sites. This has resulted in an extremely impressive and attractive Business Park, which has had the potential to attract high quality business investors into Newport, providing much needed employment opportunities for the local populace and a positive effect on the local economy. It is our opinion that future business potential for this area would be severely jeopardised by the locating of a Gypsy Traveller site amid what is so obviously a major economic resource for Newport and South East Wales. Few, if any business investors would wish to site themselves or operate in an area whose attraction and prestige had been reduced by the inclusion of a Travellers transit site.

It is the Council’s prime responsibility to its electorate to ensure that a continuation of this economic potential is not placed at risk by such a reckless and ill thought out proposition.

We now wish to address more emotive issues that lead us to oppose plans to locate this site as proposed in the LDP. In doing so, we instigate our human rights to voice our personal concerns and elicit support for our health, safety and well being from the Country and County to which we pay our taxes. With regard to personal experiences of recent Gypsy Traveller encampments in the local area, there has been and typically is an increased level of what can only be termed as “Anti-social behaviour” arising from Gypsy Traveller groups residing for short and long term periods within Coedkernew and Dyffryn. This ranges from piles of refuse left behind after de-camping to private property trespassed upon and damaged, theft of personal belongings, intimidating and threatening behaviour, and wild horses turned loose to forage with a disregard for the safety of local residents or damage to their property. In short therefore, surely it would be a better proposition to locate a Traveller Transit site further away from residential areas to minimise the effect of this alternative way of life upon local residents and businesses.
The proposal is for a transit site providing temporary short-term accommodation, rather than a permanent place to live. In this context, the adjacent land uses to the Celtic Way site are not considered to be hazardous, however it is agreed that they are not suitable places for children to play. The indicative layout of the transit site will include green areas for play and therefore children will have onsite facilities.

The site will be designed as a transit site and therefore only used by Gypsy/Travellers on a temporary basis as they pass through Newport. It is expected that the Gypsy/Travellers will use their vehicles to move around and there will be limited activity in terms of moving around the area on foot. Therefore the fact there is poor street lighting and a lack of pavement is not considered to be a significant concern. Increased street lighting could be provided if Members consider it to be essential.

It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

As with any other significant development, the Police will continue to be consulted as part of the detailed design process and the Council will work closely with the Police and businesses in the area to ensure any incidents of crime are dealt with swiftly.

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
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<td>Newport Traveller Sites Study Group</td>
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Document: Revised LDP, p.76
Policy: H16.01
Map: Proposals East: Proposals Plan - East
Summary: Objection to Gypsy and Traveller allocation.

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Residents in the Hartridge and Ringland areas have outlined a large number of reasons why the Hartridge Farm Road and Allotment sites are manifestly unsuitable. I will restrict myself to just five reasons why the Hartridge Farm Road site is flawed, rendering the Local Development Plan unsound.

1. That site has long been identified for housing in the Unitary Development Plan. Council committed itself to spending £29m on replacing Hartridge High School, largely by borrowing to be repaid by land sales. Relinquishing that site leaves a £6m gap in Council finances. More, in fact, as the smaller but more prestigious Pwll Pen site would be blighted by the proximity of a traveller site. Therefore, the proposal undermines the Council’s financial strategy and renders the LDP unsound.

2. The proposal also undermines the Council’s educational strategy for the east of the city. For years school numbers have been unbalanced because of the reluctance of parents to send their children to Hartridge High School because it was out of date and dilapidated, affecting the morale of both pupils and staff. As a consequence Caerleon and St Julian’s High Schools have been seriously overcrowded, affecting the quality of what they can offer. If parents were told those schools were full they would exercise their right to apply to Caldicot or even Chepstow while others opted for private schools. To rectify this situation the Council decided to invest £29m, largely borrowed, to build a new school and develop a new image in the form of Llanwern High School. The transformation is remarkable. A brand new state of the art school that pupils (and staff) want to go to without all the disadvantages of the crumbling, spread out old buildings. Morale has soared with attendance, appearance, results, and, vitally, enrolment all on the up. All this will be imperilled by the proximity of a traveller site and the £29m new building could become a very expensive white elephant, while the damaging pressure on Caerleon and St Julian’s High Schools will resume. There will be a similarly detrimental affect on Ysgol Gymraeg Casnewydd as well.

3. The RSPCA animal shelter could not continue its highly valued work with a traveller site next door. The shelters’ dogs and those of the travellers would set each other off and neither the animals, the residents nor the travellers would have any peace. Likewise, the RSPCA would not allow its staff and volunteer dog walkers to take nervous and damaged dogs past the travellers’ site. The shelter would have to move but there is no provision in the LDP for this. The same might be true if houses were built on the site, although current residents have no problem, but funding for resettlement could be allowed for by planning condition.

4. The same is true of the Road Safety Centre which does vital work with youngsters who could be a menace on the roads. Road Safety lessons are a vital part of the curriculum of difficult to educate pupils at the High School. They can walk to the Centre and bussing them elsewhere would put a continuing drain on scarce school resources. No provision for re-location is made in the LDP.

5. The policy of concentration of traveller families is flawed. Lumping three separate families of different traditions together would create a large concentration against WG guidelines and common sense. Travellers have talked about a “concentration camp” and a “ghetto”. A leading councillor who was involved in devising this policy spoke in Council of putting them all together for ease of control and preventing the pain spreading to other areas. I would suggest that smaller units spread across the community makes far more sense.

For these five reasons and many more put forward by others, such as transforming the lives of the immediately adjacent neighbours, traffic congestion, SDR and railway noise and danger, I maintain that the LDP is unsound. I would particularly stress the undermining of the Council’s own financial and educational strategies.

If objectors are expected to put forward alternative sites I would suggest returning to the carefully considered original sites which were recommended by both planners and councillors. There will be objections to all sites and none are perfect. However, difficulties such as flood plain considerations can be overcome. A site that wasn’t available when the original five were proposed was the former speedway site. That is probably the best option of all and has the important advantage that the travellers favour it. Despite what has been represented that is emphatically not the case with Hartridge Farm Road and the Allotments. Consultation with the travellers was seriously flawed.
The Council has a duty to identify the need within its area for gypsy and traveller sites, and to then find sites to address that need. The LDP must provide sufficient land to meet the need arising during the Plan period. The Council is aware of the financial implications to its budget in meeting this statutory requirement.

It is acknowledged that the size of the Hartridge Farm Road site is larger than Welsh Government guidance suggests, however this will avoid the need to split any of the individual families, which is an important factor for the families themselves. The size is sufficient to accommodate all 3 families, which would meet Newport’s residential need for Gypsy/Traveller provision. The proposed layout would use screening to effectively create 3 independent sites within the curtilage of the whole site. The site would also be screened from the road and nearby residential properties.

The site will be well screened and should not impact on Llanwern High School. Perception of Gypsy/Travellers at the School is something that the Council will need to address through interaction with the Head Teacher and Governors.

The draft indicative layout of this site shows that a significant buffer could be provided between the RSPCA Centre and the pitches.

The Road Safety Centre at the site would need to be relocated. The Council will assist with the relocation as best it can. This would be the case for any proposed use of the site.

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
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Document: Revised LDP, p.76  
Policy: H16.02  
Map: Proposals East: Proposals Plan - East  
Summary: Objection to Gypsy and Traveller site.

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*Item Question*  
*Representation Text*
Residents in the Hartridge and Ringland areas have outlined a large number of reasons why the Hartridge Farm Road and Allotment sites are manifestly unsuitable. I will restrict myself to just five reasons why the Hartridge Farm Road site is flawed, rendering the Local Development Plan unsound.

That site has long been identified for housing in the Unitary Development Plan. Council committed itself to spending £29m on replacing Hartridge High School, largely by borrowing to be repaid by land sales. Relinquishing that site leaves a £6m gap in Council finances. More, in fact, as the smaller but more prestigious Pwll Pen site would be blighted by the proximity of a traveller site. Therefore, the proposal undermines the Council's financial strategy and renders the LDP unsound.

The proposal also undermines the Council's educational strategy for the east of the city. For years school numbers have been unbalanced because of the reluctance of parents to send their children to Hartridge High School because it was out of date and dilapidated, affecting the morale of both pupils and staff. As a consequence Caerleon and St Julian's High Schools have been seriously overcrowded, affecting the quality of what they can offer. If parents were told those schools were full some exercised their right to apply to Caldicot or even Chepstow while others opted for private schools. To rectify this situation the Council decide to invest £29m, largely borrowed, to build a new school and develop a new image in the form of Llanwern High School. The transformation is remarkable. A brand new state of the art school that pupils (and staff!) want to go to without all the disadvantages of the crumbling, spread out old buildings. Morale has soared with attendance, appearance, results, and, vitally, enrolment all on the up. All this will be imperilled by the proximity of a traveller site and the £29m new building could become a very expensive white elephant, while the damaging pressure on Caerleon and St Julian's High Schools will resume. There will be a similarly detrimental affect on Ysgol Gymraeg Casnewydd should a traveller site be just the width of a road away.

The RSPCA animal shelter could not continue its highly valued work with a traveller site next door. The shelters' dogs and those of the travellers would set each other off and neither the animals, the residents nor the travellers would have any peace. Likewise, the RSPCA would not allow its staff and volunteer dog walkers to take nervous and damaged dogs past the travellers' site. The shelter would have to move but there is no provision in the LDP for this. The same might be true if houses were built on the site, although current residents have no problem, but funding for resettlement could be allowed for by planning condition.

The same is true of the Road Safety Centre which does vital work with youngsters who could be a menace on the roads. Road Safety lessons are a vital part of the curriculum of difficult to educate pupils at the High School. They can walk to the Centre and bussing them elsewhere would put a continuing drain on scarce school resources. No provision for re-location is made in the LDP.

5. The policy of concentration of traveller families is flawed. Lumping three separate families of different traditions together would create a large concentration against WG guidelines and common sense. Travellers have talked about a “concentration camp” and a “ghetto”. A leading councillor who was involved in devising this policy spoke in Council of putting them all together for ease of control and preventing the pain spreading to other areas. I would suggest that smaller units spread across the community makes far more sense.

For these five reasons and many more put forward by others, such as transforming the lives of the immediately adjacent neighbours, traffic congestion, SDR and railway noise and danger, I maintain that the LDP is unsound. I would particularly stress the undermining of the Council's own financial and educational strategies.
If objectors are expected to put forward alternative sites I would suggest returning to the carefully considered original sites which were recommended by both planners and councillors. There will be objections to all sites and none are perfect. However, difficulties such as flood plain considerations can be overcome. A site that wasn’t available when the original five were proposed was the former speedway site. That is probably the best option of all and has the important advantage that the travellers favour it. Despite what has been represented that is emphatically not the case with Hartridge Farm Road and the Allotments. Consultation with the travellers was seriously flawed.

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Hartridge Farm Road:

Size and Layout – It is acknowledged that the size of the Hartridge Farm Road site is larger than Welsh Government guidance suggests, however this will avoid the need to split any of the individual families, which is an important factor for the families themselves. The size is sufficient to accommodate all 3 families, which would meet Newport’s residential need for Gypsy/Traveller provision. The proposed layout would use screening to effectively create 3 independent sites within the curtilage of the whole site. The site would also be screened from the road and nearby residential properties.

Location – The site is within the settlement boundary and considered to be a sustainable location. Remote locations outside of the settlement boundary have poorer access to amenities and place more of an emphasis of car travel, therefore deemed to be more unsustainable. Site design can ensure it is well screened from the nearby RSPCA Centre and Llanwern High School.

Current Use – The Road Safety Centre at the site would need to be relocated. The Council will assist with the relocation as best it can. This would be the case for any proposed use of the site.

Proximity to Sewage Pumping Station – No concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

Access – It is acknowledged that the Hartridge Farm Road site will require improvements to the access road including the provision of a length of pavement. This will be agreed as part of a planning application and is not considered insurmountable.

Llanwern High School – The site will be well screened and should not impact on Llanwern High School. Perception of Gypsy/Travellers at the School is something that the Council will need to address through interaction with the Head Teacher and Governors.

Ysgol Gymraeg Casnewydd - The site will be well screened and should not impact on Ysgol Gymraeg Casnewydd. Perception of Gypsy/Travellers at the School is something that the Council will need to address through interaction with the Head Teacher and Governors.

Financial Matters – The Council is aware of the financial implications to its budget.

RSPCA Centre – The draft indicative layout of this site shows that a significant buffer could be provided between the RSPCA Centre and the pitches.

Land Presentation – Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development. Ground re-profiling works will be required at Hartridge Farm Road and the work will add to the development costs, but is not considered insurmountable.

Amenities – It is agreed that the locking of the underpass is something that needs to be avoided in order to ensure access to local amenities. The site is also within a short walk from Newport Retail Park.

Noise – A noise assessment has been undertaken for Hartridge Farm Road. It is proposed that a 1.8m high noise attenuation fence is constructed adjacent to the RSPCA Centre, alongside the mainline railway and between the SDR and north-eastern part of the site.

Potential danger caused by animals – The Council has a duty to provide accommodation for the gypsy/traveller population. We do not have a duty to provide land for horses. The site will be owned and managed by the Council and there is no intention to allow the occupants to keep horses on site.

Aspect – A noise attenuation fence will be constructed alongside the mainline railway and the area will be well screened.

The Process – The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.

Flooding – There are no flood risk issues at Hartridge Farm Road providing a buffer is left at the southern edge of the site adjacent to the railway.
Crime/Perception of Crime – As with any other significant development, the Council has liaised with the police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the police if any incidents of crime that relate to the site are reported.

Alternative Sites – Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

Regional/Cross boundary issues As part of the Fordham Assessment research, interviews were conducted with neighbouring residents in order to discuss and establish the impact of cross-boundary movements. The outcomes were factored into the conclusions and recommendations of the report.

The Council must provide sites to meet the need identified for families within its area that require accommodation. Sites should be allocated within the relevant Authority's area, not in a neighbouring Authority, in the same way as each Authority is required to meet its bricks and mortar housing needs within its own LDP.

There have been informal discussions with South East Wales Authorities about establishing a regional network of transit sites, however there is clear evidence that a transit site is needed within Newport. There is no report yet produced.

House Prices – The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.

Ringland Allotments:

Health Issues and Pylons - No concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

Location - The site is adjacent to the settlement boundary and considered to be a reasonably sustainable location. More remote locations that are further outside of the settlement boundary have poorer access to amenities and place more of an emphasis on car travel, therefore deemed to be more unsustainable.

Land Presentation – Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development. The results of these surveys have confirmed that some ground re-profiling works will be required at the Former Ringland Allotments. This work will add to the development costs but is not considered to be insurmountable.

Access – Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

Existing Use – There are no allotments on the site. Alternative allotment provision can be investigated if it is demonstrated there is insufficient allotment provision across Newport as a whole.

Aspect – A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

Highway Safety - Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

Environmental – The Council Strategy is a Brownfield led strategy and preference is given to sites which are previously developed. A number of greenfield sites are within the Plan as they are considered appropriate and well located for development. This is why this site is included.

Amenities - It is agreed that the locking of the underpass is something that needs to be avoided in order to ensure access to local amenities.

Flooding – Flood risk at this site is not considered to be a significant risk.

Financial Implications – The Council is aware of the potential financial implications of going ahead with the site. Gallagher Estates have planning permission for their major development in close proximity to the site and although they have submitted representations of concern, they are currently continuing to submit information to enable them to discharge planning conditions and get on site and build.
Privacy and Noise - A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

Potential danger caused by animals - The Council has a duty to provide accommodation for the Gypsy/Traveller population. We do not have a duty to provide land for horses. The site will be owned by the Council and there is no intention to allow the occupants to keep horses on site.

The Process – The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.

Crime/Perception of Crime – As with any other significant development, the Council has liaised with the police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the police if any incidents of crime that relate to the site are reported.

Alternative Sites – Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

House Prices – The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.
Representation Details

Document: Revised LDP, p.22
Policy: SP08
Summary: Propose amendment to SLA at Langstone.

Item Question  Representation Text

However, further improvement could be made to the Plan in protecting Langstone from further major development by adding the Countryside north of the A48 that is outside of the boundary settlement, up to and including Old Roman Road, and designate it as a ‘Special Landscaped Area.’

Item Question  Council Responses

The identification of Special Landscape Areas was undertaken using the Landmap information system, as referenced in Planning Policy Wales. Landmap is the data set used in the overall assessment for the identification of Special Landscape Areas. The assessment is undertaken using the methodology identified in the Special Landscape Area Designation Criteria, included within the Countryside Council for Wales’ guidance.

Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.
Representation Details

Document: Revised LDP, p.75
Policy: General G&T
Summary: Support the plan with particular reference to location of Gypsy and Traveller sites.

 Representation Details

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Representation Details

Representation

Having been made aware of the revisions to the above plan and in particular reference to the location of the Gypsy Traveller sites as set out in the plan, is acceptable, and I accept and approve the Revised Deposit Local Development Plan.

Council Response

Support noted.
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3978.L1/General

Jenkin, A

31/07/2013

Document: Revised LDP, p.75
Policy: General G&T
Summary: Support the LDP with particular reference to proposed Gypsy and Traveller sites.

Item Question  Representation Text

11  Representation
Having been made aware of the revisions to the above plan and in particular reference to the location of the Gypsy Traveller sites as set out in the plan, is acceptable, and I accept and approve the Revised Deposit Local Development Plan.

Item Question  Council Responses

13  Council Response
Support noted.
However, further improvement could be made to the Plan in protecting Langstone from further major development by adding the Countryside north of the A48 that is outside of the boundary settlement, up to and including Old Roman Road, and designate it as a 'Special Landscaped Area.'

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Following the assessment of Newport by consultants TACP, the Local Authority had the task of refining the boundaries to ensure that the SLA boundaries were coherent and consistent. This meant that clearly defensible boundaries were taken e.g. road, hedgerow etc. The refinement of the final boundary looked at the proposed SLAs, identified by the assessment of the Landmap data and, did not seek to amend this nationally consistent data set. The area between the A48 and Roman Road within Langstone did not score highly enough, as part of the Landmap assessment process, and because of this the area has not been included as Special Landscape Area in the Revised Deposit Local Development Plan.
### Representation Details

**by:** (No grouping)

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Document: Revised LDP, p.75

Policy: H15.02

Summary: Object to proposed Gypsy and Traveller site at former Ringland Allotment.

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**Item Question**  **Representation Text**
We the undersigned wish to register our objection to the Gypsy and Traveller site proposed at Hartridge Farm Road.

Our reasons are summarised as follows:

Size – The proposed size of the site is unimaginable and is far outside the Welsh Assembly Government’s Guidelines and Good Practice. The site is intended to have up to 43 pitches with each pitch having up to 3 to 4 caravans. This will make this site not just the biggest in Britain but the biggest in Europe. Such a development will not be in the interest of residents or travellers alike wherever that area is located and will not be in the interest of Newport itself. Further a site of this scale will not encourage the integration of travellers within the community but is likely to have the opposite effect. Therefore the proposal itself is inconceivable.

Layout – The proposed layout is contrary to the good faith of the Welsh Government’s Guidelines and Good Practice. To take a single large site and split it into three sites to house all three families flagrantly contravenes the guidelines and will dominate the immediate small community. It is also unfair to the travellers as they do not want communal sites as it will promote conflict within the families as well as likely to infringe the human rights of both the travellers and the immediate communities alike.

Location – This site is not suitable and other sites are more suitable. The location of the site is regarded by the Travellers themselves as unsuitable as they have justifiable concerns being too close to Llanwern High School with regards to conflict. Their preference is to be more remote. Further considerations should be given other sites such as the former speedway site, and similar, that have previously been nominated by both travellers and non-travellers alike, and to those sites identified in the existing Local Development Plan as being more favourable. The revised version of the plan does not give due consideration to the alternative sites available, nor does it provide sustainable reasons for rejecting those previously preferred.

In the revised draft plan, the Council have favoured sites to the east of Newport as the preferred locations. Travellers have expressed no such preference and are more concerned that selection should be based on the suitability of each individual site.

Current use – The Road Safety Centre is the focal point of contact for all road safety education, training and publicity service in Newport and surrounding area. To lose this facility would be a great loss to Newport as some courses in particular develop an understanding of behaviour and attitude and build confidence in the students (especially those of low attainment) themselves and many go on to a career in motor maintenance and the like from the experience and knowledge they have gained. Further, the Centre is within walking distance for the Llanwern High School pupils.

Proximity to Sewage Pumping Station – The site is located within a close proximity to a sewage pumping station. There may be health implications linked to the airborne particles produced by these stations.

Access- The site has restricted access along a lane adjacent to two schools. The schools attract a tremendous amount of traffic at peak times while Hartridge Farm Road alongside the houses there are no footpaths, no street lighting and the road narrows to just 15 feet. The road leading up to the site is in poor condition and barely suits its current needs. This would need extensive and costly refurbishment. The Policy Review Group has already identified and recorded vehicle access issues for the triangular site but is now choosing to ignore it.

Llanwern High School – Because of parents’ perception of traveller sites, rightly or wrongly, it would undermine the Council’s strategy of improving education in the east of the city. (Prior to the building of the new High School parents were reluctant to send their children to the old Hartridge School, choosing St Julian’s, Caerleon, Caldicot or Chepstow Schools instead). The remarkable transformation of the new building and the look, attitude and pride of the pupils has changed that. However, all the good work put into the new school could be undermined and the impressive new Llanwern High School could become a very expensive, underused, facility.

Ysgol Gymraeg Caesnewydd – Again because of parents’ perception of traveller sites, rightly or wrongly, parents are likely to reconsider their choice of school for their children. This would undermine further the already fragile financial position of the school thus deterring future needed investment.

Financial Matters – The Council’s financial strategy will also be undermined because the proposed site is designated for building and the capital receipts used to offset the cost of the new Llanwern School and so reduce the Council’s debt.

RSPCA Centre – For years the RSPCA Centre and the residents have co-existed amicably. The dogs are rarely noisy, unless they are disturbed. They would be constantly disturbed if there was a traveller site next door. This would result in stressed animals and residents, including the travellers themselves. RSPCA staff and volunteers daily exercise the dogs but say they could not risk walking their nervous, abandoned charges passed a travellers site.
Land Presentation – The topography of this site, as it stands, is not totally suitable for the proposed use. Again the Policy Review Group has already identified and recorded that the topography of the triangular site is unsuitable but is now choosing to ignore it.

Amenities – Access to local amenities is via an underpass to Ringland. This underpass has in the past been often locked due to safety and anti-social behaviour issues. Such issues are likely to be considerably exacerbated by the proposed development thus putting travellers and their families at risk. The Travellers themselves have also expressed concerns.

Noise – As the site is adjacent the busy main railway line there will be noise problems that will be a particular issue for caravans. A noise attenuation fence is proposed here but due to the level of noise will be of little effect.

Potential danger caused by animals – it is well know that many traveller families keep a stock of ponies and horses now or in the future. There are many well documented examples of these animals escaping their confines. An animal of this nature running out onto the Railway, SDR or found wandering through the adjacent Schools or neighbouring Ringland Estate or Llanwern Village will undoubtedly cause issues and even cost lives in the case of the Railway or SDR.

Aspect – The site will be highly visible from the busy mainline railway and would potentially create a poor image of Newport.

The Process – The Scrutiny Report dated 29th October, 2012 and, consequently, accepted by Cabinet on 12th November 2012 is inconsistent, biased, is incomplete in its assessment made and offers no analytical evidence of the preferences made for the selection of travellers sites as claimed. The Policy Review Group recommendations display a lack of understanding of the Travellers needs which was further reinforced by a member of the Policy Review Group during Full Council on 4th June 2013 displaying a serious lack of understanding of what constitutes a Travellers Site thus casting further, serious, doubt on the integrity of the aforementioned report they produced.

In conclusion this site is neither suitable for the provision of traveller sites nor is such a massive site, the biggest in Europe, in the interest of Newport. Further the integrity of the Policy Review Group’s Report, recommendations and conclusions are questionable for the reasons given. Moreover, there are no sound reasons for removing the sites previously proposed.
Council Response

It is acknowledged that the size of the Hartridge Farm Road site is larger than Welsh Government guidance suggests; however this will avoid the need to split any of the individual families, which is an important factor for the families themselves. The size is sufficient to accommodate all 3 families, which would meet Newport’s residential need for Gypsy/Traveller provision. The proposed layout would use screening to effectively create 3 independent sites within the curtilage of the whole site. The site would also be screened from the road and nearby residential properties.

The site is within the settlement boundary and considered to be a sustainable location. Remote locations outside of the settlement boundary have poorer access to amenities and place more of an emphasis on car travel, therefore deemed to be more unsustainable. Site design can ensure it is well screened from the nearby RSPCA Centre and Llanwern High School.

The Road Safety Centre at the site would need to be relocated. The Council will assist with the relocation as best it can. This would be the case for any proposed use of the site.

With regards to the proximity to Sewage Pumping Station, no concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

It is acknowledged that the Hartridge Farm Road site will require improvements to the access road including the provision of a length of pavement. This will be agreed as part of a planning application and is not considered insurmountable.

The site will be well screened and should not impact on Llanwern High School or Ysgol Gymraeg Caesnewydd. Perception of Gypsy/Travellers at the Schools is something that the Council will need to address through interaction with the Head Teacher and Governors.

The Council is aware of the financial implications to its budget.

The draft indicative layout of this site shows that a significant buffer could be provided between the RSPCA Centre and the pitches.

Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development. Ground re-profiling works will be required at Hartridge Farm Road and the work will add to the development costs, but is not considered insurmountable.

It is agreed that the locking of the underpass is something that needs to be avoided in order to ensure access to local amenities. The site is also within a short walk from Newport Retail Park.

A noise assessment has been undertaken for Hartridge Farm Road. It is proposed that a 1.8m high noise attenuation fence is constructed adjacent to the RSPCA Centre, alongside the mainline railway and between the SDR and north-eastern part of the site.

The Council has a duty to provide accommodation for the gypsy/traveller population. We do not have a duty to provide land for horses. The site will be owned and managed by the Council and there is no intention to allow the occupants to keep horses on site.

A noise attenuation fence will be constructed alongside the mainline railway and the area will be well screened.

The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.
### Representation Details

by: (No grouping)  
Filtered to show: (all of) Stage=L; Status=M  
Rep'n/Para/Policy | Representer | Accession No | Date Lodged | Late? | Source | Type | Mode | Status | Status Modified
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3979.L1//H15.01 | Thomas, Mrs A | 30/07/2013 | O | M | P | O | M

Document: Revised LDP, p.75  
Policy: H15.01  
Summary: Object to proposed Gypsy and Traveller site at Celtic Way.

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**Item Question**  
**Representation Text**

11 11  
Representation  
The full consultation comments are available to view against representation reference 3820.L1.

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**Item Question**  
**Council Responses**

13 13  
Council Response  
The Council response to this representation can be found against representation 3820.L1

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### 3979.L2//H15.02

Document: Revised LDP, p.75  
Policy: H15.02  
Summary: Support use of former Ringland Allotments as an alternative to site proposed at Celtic Way.

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**Item Question**  
**Representation Text**

11 11  
Representation  
The full consultation comments are available to view against representation reference 3820.L2.

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**Item Question**  
**Council Responses**

13 13  
Council Response  
The Council response to this representation can be found against representation 3820.L2
### Representation Details

**Representee:** Thomas, Mrs A  
**Document:** Revised LDP, p.75  
**Policy:** General G&T  
**Summary:** Propose two new sites, A449 and Tredegar House Caravan Park, as an alternative to site proposed at Celtic Way.

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### Council Responses

**Item:** Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

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**Representee:** Harley-Saxton, Mrs J  
**Document:** Revised LDP, p.75  
**Policy:** H15.01  
**Summary:** Object to site proposed for Gypsy and Traveller accommodation at Celtic Way.

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**Item:** Speaking at Public Examination  
**Yes**

**Item:** The Council response to this representation can be found against representation 3820.L1
Representation Details

by: (No grouping)
Filtered to show: (all of) Stage=L; Status=M

Rep'n/Para/Policy Representer Agent Accession No Date Lodged Late? Source Type Mode Status Status Modified

3980.L2//H16.02 Harley-Saxton, Mrs J

Document: Revised LDP, p.76
Policy: H16.02
Summary: Support use of former Ringland Allotments as an alternative to site proposed at Celtic Way.

Item Question Representation Text

11 Representation

The full consultation comments are available to view against representation reference 3820.L2.

12 Speaking at Public Examination

Yes

Item Question Council Responses

13 Council Response

Former Ringland allotments, taken together, have been identified as a contingency site for transit accommodation.

The following points address concerns regarding the proposed transit site at Celtic Way:

Location and Design – The proposal is for a transit site providing temporary short-term accommodation, rather than a permanent place to live. In this context, the adjacent land uses to the Celtic Way site are not considered to be hazardous, however it is agreed that they are not suitable places for children to play. The indicative layout of the transit site will include green areas for play and therefore children will have onsite facilities.

24/7 access of HGV/movement of employees – The site will be designed as a transit site and therefore only used by Gypsy/Travellers on a temporary basis as they pass through Newport. It is expected that the Gypsy/Travellers will use their vehicles to move around and there will be limited activity in terms of moving around the area on foot. Therefore the fact there is poor street lighting and a lack of pavement is not considered to be a significant concern. Increased street lighting could be provided if Members consider it to be essential.

Cardiff to Newport dual carriageway is within 0.5 miles – The fact a main transport route is in close proximity to the site is considered more of an asset than a safety risk. There are numerous homes within Newport which are within 0.5 miles of a dual carriageway or motorway.

Crime/Perception of Crime – As with any other significant development, the Council has liaised with the police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the police if any incidents of crime that relate to the site are reported.

Alternative Sites – Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
### Representation Details

**by:** (No grouping)  
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**Document:** Revised LDP, p.75  
**Policy:** General G&T  
**Summary:** Propose two sites, A449 and Tredegar House Caravan Park, as an alternative to the site at Celtic Way.

#### Item Question  
**Representation Text**

11  Represetation  
The full consultation comments are available to view against representation reference 3820.L3.

12  Speaking at Public Examination  
Yes

#### Item Question  
**Council Responses**

13  Council Response  
Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
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Document: Revised LDP, p.62  
Policy: CE11  
Summary: Propose new policy and text so that it is criteria based and qualities of Gwent Levels identified.

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CE1, CE2, CE3
1.1 These comments apply to Policy CEll of the Revised Deposit LOP and accompanying explanatory text.

1.2. We would firstly like to welcome the positive wording of policy CEll and the forthcoming production of a Renewable Energy Assessment referenced in paragraph 4.50. However, whilst the general theme of the policy is admirable, we consider it to be unsound for 2 main reasons:

• The policy is too vague and does not follow a criteria based approach to application management

• The ‘special qualities’ of the Gwent Levels are not properly defined in the policy or supporting text and a criteria based approach for assessing development in this area has not been applied

1.3. In terms of the former, it is proposed that a criteria based approach be introduced to provide clarity to developers and planning officers on how best to respectively prepare and determine an application. Whilst it is appreciated that all the parameters and potential issues arising from a renewable energy scheme can be discussed at pre-application stage, it provides more solid guidance for such matters to be clearly set out in planning policy. This way, substandard proposals, under prepared planning applications and reactionary / unnecessary officer responses can be avoided. A criteria based approach provides both the developer and planning officer with the issues that require particular consideration and this can only help secure the provision of sensitive and effective renewable energy developments.

1.4. Paragraph 4.53 of the explanatory text states that a wind capacity study has been carried out for the Newport area and that the findings will be referred to in the consideration of planning applications. It is recommended that this guidance be incorporated into Policy CEll as part of the criteria based approach suggested above.

1.5. Regarding the second bullet point, it is recommended that further guidance be included on the ‘special qualities’ of the Gwent Levels. This could potentially form part of the explanatory text i.e. an addition to paragraph 4.51. In particular, it is not clear how renewable energy development in this area should be addressed. Would be determined.

The Levels are protected by the following designations:

• Landscapes of Outstanding Historic Interest
• SSSI
• Archaeologically Sensitive Areas
• Green Belt (in part)

1.6. However, in terms of landscape character, the Gwent Levels are not designated an AONB or National Park, so do not warrant the highest level of protection. Furthermore, the installation of wind turbines would be unlikely to impact on the characteristics resulting in its designation as a Landscape of Outstanding Historic Interest. Obviously, these comments are focussed on one specific element of renewable energy, but the same issue applies to other types - without further guidance and specific criteria, the process of application preparation and assessment becomes overly vague and can result in unnecessary / reactionary policy hurdles.

1.7. One further point to mention is that the Gwent Levels cover an area included within the boundaries of Newport and Monmouthshire. As such, a co-ordinated approach to renewable energy schemes should be undertaken. This is not promoted in the policy or supporting text and should be included prior to adoption.

1.8. In order to make the policy sound, a positively worded, unambiguous and criteria based approach should be introduced. It is considered that Core Policy 23 of the Woking Borough Council Core Strategy provides a good example of a generic (covering a range of renewables) renewable energy policy that could be considered by Newport. This policy aligns well with strategic energy targets and national policy requirements. The full wording of this policy is set out below for reference:

C523: Renewable and low carbon energy generation

The Council recognises significant progress needs to be made if national targets for the generation of renewable energy are to be met and encourages the development of standalone renewable energy installations in the Borough. All proposals will be considered on their individual merits with regard to scale, location, technology type and cumulative impact on the surrounding area.

The Council particularly encourages applications from community-based and community owned projects.
Applicants should take appropriate steps to mitigate any adverse impacts of proposed development through careful consideration of location, scale, design and other measures. All reasonable steps to minimise noise impacts should be taken.

Applicants should provide sound evidence of the availability of the resource which will be harnessed or the fuel to be used, including details of the adequacy of transport networks where applicable and detailed studies to assess potential adverse impacts such as noise nuisance, flood risk, shadow flicker and interference with telecommunications.

1.9. Overall, when faced with Policy CE11, a renewable energy provider will be unable to identify and quantify the measures required to make a suitable application for planning permission. The policy, therefore, hinders rather than assists implementation and a criteria based approach should be introduced in its place.

1.10. Whilst the positive wording of the policy is appreciated, it does not appear to be based on a strategy to meet an objectively assessed need for renewable energy and infrastructure. Although that research has been carried out as part of the evidence base, this has not been carried forward to inform a criteria-based approach to application management.

1.11. Given the above, it is considered that, in its current form, Policy CE11 fails to accord with Test of Soundness CE1, CE2 and CE3 and should be amended accordingly.
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Document: Revised LDP, p.75  
Policy: General G&T  
Summary: Shortfalls in the gypsy and traveller accommodation provision in the Revised LDP.

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INTRODUCTION

1.0 MSP are instructed by the Ringland Matters Group (‘the Group) to report on the Revised Deposit Newport Local Development Plan, (the ‘revised LDP’) issued for consultation and comment to interested parties. The group has been set up to look at the proposed ‘allocation’ in the deposit LDP of the residential and transit gypsy and traveller sites at Hartridge Farm Road and the Ringland allotments. This report therefore looks at and assesses the gypsy and traveller aspects of the deposit LDP.

1.1 This report is made to the group and we acknowledge that it can be submitted to Newport City Council by the group as a duly made representation to the revised LDP.

1.2 In line with the requirements of the Local Development Plan Wales (LDPW) and its accompanying regulations 2005, this report sets out to apply the test of ‘soundness’. These tests are set out in terms of ‘procedural’; ‘consistency’ and ‘coherence and effectiveness’. In this assessment, the key tests of consistency and coherence and effectiveness have been looked at. We have not paid regard to procedural matters as they relate to compliance with the Delivery Agreement, the Community Involvement Scheme and Sustainability Appraisal and Strategic Environmental Assessment, which are matters for the Government to address.

1.3 However, one procedural matter that does arise is the issue concerning the issue of the revised LDP itself. This revision follows the placing on deposit of the LDP in its original form in 2012. In relation to the groups’ interest, that original deposit plan had gypsy and traveller site allocations on land well away from them and so had no effect to them at all. The revised LDP is said to be made by the Officers of the Council under regulation 17 of the 2005 LOP Regulations.

1.5. We have looked accordingly at part 17 of those regulations, which deal with how to make a deposit plan. We can find no provision in them for a revised LOP once it has been placed on deposit. Rather, any changes should be dealt with by way of ‘focused changes’ to the plan, whereby the appointed Inspector can only make changes to the plan, and these are by way of directions the Council must then follow. The Council has agreement from the Welsh Assembly that a revised LOP may be made by the newly elected Council under regulation 17 of the 2005 LOP Regulations.

1.6. We have looked accordingly at part 17 of those regulations, which deal with how to make a deposit plan. We can find no provision in them for a revised LOP once it has been placed on deposit. Rather, any changes should be dealt with by way of ‘focused changes’ to the plan, whereby the appointed Inspector can only make changes to the plan, and these are by way of directions the Council must then follow. The Council has agreement from the Welsh Assembly that a revised LOP may be made by the newly elected Council under regulation 17 of the 2005 LOP Regulations.

THE TESTS OF SOUNDNESS

2.0. The Planning Acts require all LDP’s to be subject to an examination by an independent Inspector. That appointed Inspector will assess the soundness of the plan. That test of soundness relates to the policy content of the plan and the process for its production. Under these headings, there are ‘10’ tests identified against which the test of soundness will be applied2-.

These tests we now go on to accordingly apply.

3.0 TEST C1

3.1. Section 225 of the Housing Act 2004 requires local authorities to assess the needs of gypsy and traveller accommodation. Guidance on how that is to be assessed sets out that is may be beneficial
3.2. Circular 30/2007 states that, following the guidance for Local Market Housing Assessments, the circular guidance ‘strongly recommends that local authorities work in partnership with neighbouring authorities as travelling patterns are liable to cross local authority boundaries’ 5.

3.3. Despite the above national guidance, the Council’s gypsy and traveller strategy in the revised LDP is based, almost solely, on the findings of the Fordham report, published in 2010. Having looked at that report, we can find no recommendation or assessment of any cross boundary working with adjacent authorities. This may because this aspect was not included in the Council’s brief to Fordhams. In any event that needs’ report can only be used to inform the Council’s policy, it is not the policy itself. However, the revised LDP policy appears to be based solely on it, thereby completely ignoring the policy advice of Government and thereby, in our view, failing to meet test C1 of the LDP regulations.

3.4 The Government's overall approach to gypsy and traveller provision has been assessed numerically, and this is estimated to be between 275 - 305 families to meet need and family increase to 20116. Whilst these figures can be further revised as a result of each local authority carrying out its own needs assessment, there is no paper, policy or report in the revised LDP which shows how provision in adjoining authorities or across the region or sub region has been taken into account, affects or otherwise the projected needs base for Newport or its gypsy -traveller provision. For example, in relation to the provision of transit sites, Circular 30/2007 makes it clear that such provision is an across boundary issue. We are aware, for example, that cardiff is actively seeking a major transit site along the M4 corridor and yet in the revised LDP no account is taken as to whether or not such provision will meet the transit needs of Newport from such a site, which will be only a few miles away and on the major transport links through the region, therefore meeting transit needs. Without any such assessment, transit provision in this revised LDP is fundamentally flawed as it ignores the Government's approach to such provision. On permanent sites, the same applies. That is that the numbers required to be provided may (or may not) be affected by provision in adjoining or nearby authorities. No assessment is made, so the revised LDP assumptions on numbers required to be provided in the Newport area cannot be relied on as ‘need’ in the area, because there is no apparent basis to assess that need in the region. There is no assessment as to how the numbers of permanent pitches proposed for Newport in the revised LDP affect or otherwise the overall provision in the region, or Wales as a whole. It cannot therefore be known whether the overall targets identified by the Government's own assessment is met or whether an overprovision is made and whether that overprovision will result in immigration from other areas if such overprovision is made, to the detriment of Newport residents. We say there is a detriment because it is acknowledged that a gypsy or traveller site adjacent to existing housing will result in community disarray7.

3.5 We have had a look at the selection criterion used by the Council for site selection of gypsy and traveller sites. The actual criteria used by the Scrutiny Review Assessment in 2012, relate to various points but none relate to site size9. This is despite the fact that in that same paper, it is outlined that consultation by the Council with the gypsy and traveller community in 2010, revealed that a 'small site' was desirable (it is in fact placed at the top of the list10). This however appears to have been ignored. We can find no paper or report either in the LDP or its documents that sets out why a site 3.5 times the size (43/12) of that recommended in Government guidance is proposed. This the Council is required to do if this part of the test C2 is to be met.

4.0 TESTC2

4.1 The most obvious conflict with national policy in relation to gypsy and traveller sites in the revised LDP is the size of the permanent site proposed at Hartridge Farm Road. 43 pitches are proposed at the site, which could be the equivelant of 172 individual caravans (assuming 4 caravans per pitch). National guidance on site design of such sites set out quite clearly that they should ideally be no more than 12 pitches and taking into account local circumstances and need, no more than 15-20 pitches8. The proposal at Hartridge Farm Road is over twice that recommended size, completely in conflict with that national guidance and therefore a failure of test C2.

4.2 We have had a look at the selection criterion used by the Council for site selection of gypsy and traveller sites. The actual criteria used by the Scrutiny Review Assessment in 2012, relate to various points but none relate to site size9. This is despite the fact that in that same paper, it is outlined that consultation by the Council with the gypsy and traveller community in 2010, revealed that a 'small site' was desirable (it is in fact placed at the top of the list10). This however appears to have been ignored. We can find no paper or report either in the LDP or its documents that sets out why a site 3.5 times the size (43/12) of that recommended in Government guidance is proposed. This the Council is required to do if this part of the test C2 is to be met.

4.3. National policy requires that the gypsy and traveller community be involved at an early stage in the preparation of LDP's. The Council's Gypsy and Traveller accommodation background paper states that since 2010, the Council has dramatically increased its interaction with that community. However, we can find no papers to the revised LDP that set out what those consultations were, what questions or what options were put to that community. Thus that part of the LDP process is not transparent enough to enable other stakeholders, such as the community around the proposed residential site, to assess how extensive or appropriate that consultation has been or whether the proposed allocation reflects that community's desires and wants. Whilst this should be set out in the Community Involvement Scheme as part of the LDP process, we have still been unable to identify for example, if any of the suggested sites were put forward or proposed by that community. What is clear is that the Council's selection criterion used for the site selection does not have any criteria based on whether the gypsy and traveller community want the sites or not. That runs contrary to Government advice because it is not identified to what extent the sites put forward arise from work with the gypsy and traveller community, whether they are suitable for them or which, if any sites, are put forward by them. This should be made clear and transparent in the LDP and in accordance with Government advice*11. Further, without such information being readily available and transparent, it cannot be relied upon as fully informing the LDP process and hence, site selection.

4.4. On the matter of site selection, the criterion the Council has used appear to be selectively ignoring Government guidance as to what, and what weight, should be attached to them. The criterion
used for site selection in the first and second rounds relate primarily to avoiding environmentally sensitive areas, proximity principles (including settlement boundaries) and whether or not the sites are owned by the Council. 12 Circular 30/2007 sets out that in terms of site selection, sites in, or near, existing settlements should be considered first. However, it also states that rural settings are acceptable in principle. In such areas it states that over rigid application of national or LDP policies that seek a reduction in car borne travel would not be appropriate.13 It seems to us that the selection criteria used by the Council by applying the settlement boundary/rural exception criterion, discounts automatically this part of possible sites suitable in accordance with that Government guidance. In other words, all rural sites are dismissed. That is not what Government guidance says and so again, the selection process fails test C2 as no such sites have been considered.

4.5. National guidance on site constraint policies also seem to have been ignored on the sites selected in the revised LOP for gypsy and traveller accommodation. The transient site proposed at Llanwern is steeply sloping and has national grid pylons over it. Not only that, but the site sits on the side of one of the main, if not the main, arterial roads into and out of Newport. The site is clearly visible by users of that road. Placing the site here has the potential to undermine the well landscaped visual amenity of the rest of that route, to the detriment of the well being of Newport as a whole. and be a potential hazard. Whilst there are underpasses under the DTR route, these are unpleasant and not used. Local knowledge confirms that they have been used as ‘ambush sites’ in the past. Planning guidance advises against putting such sites near hazards”.14

5.2. It seems to us to be unsurprising that such a cross boundary approach has not been undertaken in the revised LOP. That is because the gypsy and traveller issue has only recently been tackled in the LOP evidence base since 2010 and given the priority of the Council to now issue its LOP (as it is far behind its timetable), the Council has simply taken the short route of applying directly the ‘need’ identified in the Fordham report and applied it to a single site.

5.3 Given that there is no evidence base showing how Newport’s provision fits in with or is affected by adjoining authorities or how the provision for such sites fits in with the Government’s projections for gypsy and traveller sites in Wales15, and there is no evidence of cooperation between Newport and any other authority16”, this test is also failed.

6.0. TEST CE2

6.1. The revised LDP strategy for gypsy and travellers relies, almost solely, on the Fordham needs assessment. The strategy simply takes the findings of that report in terms of numbers and then finds a site big enough to accommodate it. That is not a realistic means of approaching a strategy for gypsy and traveller sites.

6.2. The Fordham report finds that the ‘need’ in Newport is for 29 additional residential pitches over the next 10 years”.17 The revised LOP strategy is to provide for 43 additional residential pitches.”18. This difference in numbers of pitches to be provided is only explained in the background paper as ‘through this interaction’ - that being interaction with the gypsy and traveller community since the production of the Fordham report in 2010. We can find no report or assessment in the LOP which explains how this figure is arrived at or why. The Fordham report arrives at the figure of 29 additional residential pitches as that includes an allowance of 25 pitches to accommodate need as it stands now and a 3% growth factor.19 Even allowing for natural growth beyond 2019, as allowed for in the Fordham report, to 2026, the figure does not come anywhere near the 43 pitches put forward in the revised LOP. Without the evidence base to clearly show how this figure of 43 pitches is arrived at in the LDP, the base for it is not robust and is unrealistic, thereby failing test CE2.

6.3. The methodology for the revised LOP for gypsies and travellers is to place all the residential pitches on one site, namely Hartridge Farm Road. We can find no rational for why that method of dealing with this issue is adopted in the revised LOP as the methodology for doing so is not explained. Further the policy is to provide all the projected need of 43 pitches at once (the Council say the site will be ‘phased’ but we do not consider that to be realistic once the site is operational). Again it is not explained in the LOP documents why this should be the case. The Fordham report identifies that 25 additional pitches are needed in Newport over the next ten years20. Of these, the Fordham report recommendations are that 14 pitches should be provided on social rented pitches (i.e., Council or public
body owned) over the next five years. The policy for gypsy and traveller provision is not however designed in this way if all the pitches for the whole LOP period (including the extra 14 over and above the Fordham report to make the total of 43 pitches proposed) are to be provided on one site. We cannot see any control mechanism in the revised LDP to achieve phasing. It is more realistic that once the site is operational, it will simply ‘fill up’ from the start. This is especially so as such a large site will attract ‘overspill’ from adjacent authorities and we have already pointed out that that issue has not been addressed in the revised LDP.

6.4. It seems to us therefore that the revised LDP strategy for gypsy and traveller provision is not realistic in that it is not formulated to reflect the findings of the needs assessment. When looking at approaches in other areas, for example Pembrokeshire, the LDP, (which has been accepted as sound by an Inspector), their approach is to make some initial provision and then by review periodically, to have further sites if found to be needed. Thus the site provision is spread out on smaller sites over a longer period if shown to be needed by review. We are not aware that this revised LDP has considered, or it is not shown in the LDP documents, any alternative strategy for site provision over the plan period. This it could have done if the Fordham report had been interpreted differently. Thus the revised LDP is not realistic having regard to alternatives and thus the strategy adopted is not based on a robust evidence base. Test CE2 is also therefore failed.

6.5. The identified problem in the revised LDP strategy of providing the gypsy and traveller site ‘en mass’ in those numbers at the Hartridge Farm Road site is that it will overwhelm the existing residential population there, which is small scale and rural in the lanes behind Llanwern High School. A traveller/gypsy site of this size, which will also have to provide on site employment facilities, storage, livestock provision, will completely change the character of that area for those residents, not to mention for the two adjacent schools. That is not a sound basis on which to formulate the strategy for traveller/gypsy provision, which as guidance suggests, ought to be formulated to allow better integration and inclusion with existing local communities.”

7.0. TEST CE3

7.1. The LDP is required to show evidence of how the suggested sites are to be implemented and how they are to be monitored. The reason for the monitoring is so that the LDP can be adjusted to suit new or changing circumstances.

7.2. With regard to implementation of the Hartridge Farm Road site and the Ringland allotment site at Llanwern, obvious problems are evident for which we cannot find any evidence in the LDP as to how they are to be addressed. First, with regard to the transit/residential site at Llanwern, this is an allotment site. There is specific legislation covering allotments. They are the Small Holdings and Allotment Act 1908 and The Allotments Act 1925. In brief, these set out that land purchased by local authorities as allotments must not be disposed of without Ministerial Consent. We can find no evidence in the LDP of such consent being obtained. That consent requires provision to be made for allotment holders displaced. We can see nowhere in the LDP that allows for this. Further, local authorities must assess the demand for allotments in the area and if there is, there is a statutory duty to provide them. Further still, allotments form part of the amenity provision of open and recreational space in an area. We can find no calculation as to whether the loss of the allotments to a transit/residential site use would lead to a shortfall of such provision in the area.

7.3. Second, as regards the residential site at Hartridge Farm Road, there are existing uses on that land which are the RSPCA and the Road Safety Centre. We understand these are on a long term lease from the Council. Lease provisions are set out in terms that they have to be renewed, unless the occupier chooses not to do so. We cannot find any reference in the LDP as to two these uses will be dealt with. Should they remain in situ, there will be conflict of use between them and the proposed residential gypsy/traveller site, particularly the RSPCA centre in terms of noise from animals, particularly dogs, much to the detriment of neighbours around the site.

7.4. The Welsh Assembly Government requires a biannual caravan count to be done in each local authority area. The revised LDP policy with regard to gypsy and traveller sites proposes a ‘once and for all’ solution by placing all perceived ‘need’ on one residential site. This ‘up front’ loading of the policy does not allow for any variation in need that may occur over the plan period and this will be known as a result of the required caravan counts. This not only inflexible, but also no policies are allowed for in the revised LDP for possible adjustments, up or down, to numbers needed. The policy approach should, in our view, be aimed at providing the immediate 14 pitches on Council or public body owned land with the other 15 pitches provided on smaller private sites, as the Fordham report suggests. The additional pitches taking the number up to 43 should not be included at this stage, but a flexible policy introduced into the LDP to take account of the biannual counts. In this way, the swamping of an existing community by such a large residential site could be both avoided initially and dealt with as part of the review process of the LDP. This would allow for monitoring to take place. As the revised LDP policies do not so this, in our view, test CE3 is failed as there is no provision for monitoring in the revised LDP with regard to gypsy and traveller provision.

8.0. SUMMARY AND CONCLUDING REMARKS

8.1. In our review of the revised LOP with regard to gypsy and traveller provision, we have found a number of shortfalls as regards to the test of ‘soundness’ to be applied. As an overview, we are not
it appears to us that the gypsy and traveller policy has attempted to be revised as part of the LDP process in a very tight timescale. This is not helped by the single residential site chosen to accommodate the perceived need, which will result in one of the largest residential gypsy/traveller sites in Europe. This will totally swamp the existing local Hartridge community and such provision flies in the face of national policy for such sites with regard to size. Neither is the revised LOP further helped by the apparent dismissal in the site selection criterion of existing or unauthorised encampments or any site outside the urban boundary. That is not what Government guidance on this issue sets out. Further, we can see no evidence in the revised LDP of any cross boundary liaison or any assessment as to how the policy put forward fits in with adjacent strategies or the regional picture of the provision for residential and, in particular, transit sites.

Without that being done, we fail to see how the revised LDP can be judged to be sound as the evidence base used is not robust and cannot be relied on.

Footnotes:

1 email from Welsh Assembly to Newport Council dated 20th February 2013.
2 LDP Wales paragraph 4.32
3 Paragraph 29 local Market Housing Assessment Guide
4 Paragraph 31 local Market Housing Assessment Guide
5 Paragraph 10 of Circular 30/2007
6 Accommodation needs of gypsy-travellers in Wales
7 Paragraph 3.115-3.119 Accommodation Needs of Gypsy-travellers in Wales
8 Paragraph 3.1.1 Good Practice Guide in Designing Gypsy traveller sites in Wales 2009.
9 Gypsy and traveller sites background paper.
10 Paragraph 3.7 Gypsy and traveller accommodation background paper.
11. see paragraph 18 of Circular 30/2007.
12 Paragraph 3.8 Gypsy and Traveller sites background paper.
14 Paragraph 3.2.2 Good Practice Guide in Designing Gypsy and Traveller Site in Wales
15 Good Practice Guide in Wales
16 Circular 30/2007 paragraph 23
18 Paragraph 204 Gypsy and Traveller background paper.
19 Table 8.1 the ‘Fordham’ report.
20 Paragraph 8.9 the ‘Fordham’ report.
21 Paragraph 9.2 Fordham report.
22 Paragraph 8 Circular 30/2007
23 Section 8 Allotments Act 1925
24 Introduced following the Accommodation Needs of Gypsy and Travellers in Wales 2006

Item Question

Soundness of LDP

Tick-box reply

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Council Response

Challenge in relation to the need for a Revised Deposit LDP

The Revised Deposit Local Development Plan is a revised version of the Deposit Plan, made under Regulation 17 of the 2005 LDP Regulations. The term ‘Revised’ is used to make it clear to interested parties that it is different to the April 2012 Deposit Plan that they may have already commented on, and to make it clear that the original Deposit Plan had been changed. There is no limit on the number of times that a Council can issue a Deposit Plan under Regulation 17.

Following the original LDP being placed on deposit in 2012, the Council received numerous representations which required changes to be made to the Plan. The circular letter to all Local Planning Authorities in Wales dated 10 June 2009, entitled ‘Important Guidance on Procedures for Advertising Focussed Changes to the Deposit LDP’, defines focussed changes as ‘changes that reflect key pieces of evidence but do not go to the heart of the plan, affecting only limited parts of it.’

The letter continues by noting that ‘if the local planning authority is considering making fundamental changes that affect the strategy and are of such a significant nature and scale as to go to the heart of the plan, it will need to give considerable thought as to how the plan can be taken forward’.

In consultation with Welsh Government, the Council considered that the changes it wanted to make to the Plan were too significant; therefore ‘focussed changes’ were not considered appropriate. The Council decided to amend the Plan and return to the ‘deposit stage’. The term ‘Revised Deposit’ simply attempts to distinguish it from the original 2012 Plan. This course of action was agreed by the Welsh Government and is clearly set out in the Delivery Agreement approved by the Minister.

The allegation that the Revised Deposit LDP was ‘concocted’ and rushed through “to avoid those newly elected members having a gypsy site in their wards” is simply not borne out by the facts. The five sites within the original Deposit Plan were located in Lliswerry, Marshfield and Bettws wards. As a result of the local government elections in May 2012, the political representation did not change for Lliswerry or Marshfield wards, and Bettws ward went from a Labour majority to no overall control. The selection of the preferred new sites makes it clear that the Scrutiny Committee review was not based upon political issues but upon sound land use planning.

Test C1

As part of the Fordham Assessment research, interviews were conducted with neighbouring Authorities in order to discuss and establish the impact of cross-boundary movements. The outcomes were factored into the conclusions and recommendations of the Assessment.

The Fordham Assessment also refers to a sub-regional Local Housing Market Assessment which was conducted for Blaenau Gwent, Monmouthshire, Newport and Torfaen in 2007. The second volume contains a chapter looking at the housing needs of Gypsies and Travellers across the study area.

In addition to this, the Fordham Assessment also references the South East Wales Racial Equality Council (SEWREC) Report which provides a detailed history of the connections between Gypsies and Travellers and the old county of Gwent. It is of particular value because it provides the locations of frequently used unauthorised sites in Gwent, which has helped inform the Fordham Assessment.

The South East Wales Regional Planning Group (SEWSPG) was founded shortly after devolution and discusses regional and cross-boundary planning policy matters. Planning Officers from Newport Council have actively attended these meetings since the group’s formation. In addition, Housing Officers from Newport Council attend Welsh Government run regional meetings regarding Gypsy and Traveller accommodation.

Notwithstanding the above, the Council must provide sites to meet the need identified for families within its area that require accommodation. Sites should be allocated within the relevant Authority's area, not in a neighbouring Authority, in the same way as each Authority is required to meet its bricks and mortar housing needs within its own LDP. The residential allocation at Hartridge Farm Road will be designed to accommodate three families who currently reside within Newport's administrative boundary and have done so for years and decades in some instances. The Council has a clear duty to house these families.

There have been informal discussions with South East Wales Authorities about establishing a regional network of transit sites, however there is clear evidence that a transit site is needed within Newport. The Musker Summer Report notes that Cardiff is actively seeking a major transit site along the M4 corridor, but in Cardiff's published deposit LDP, there is no provision for a transit site.

In addition to the Fordham Report, our transit site need is based upon the evidence of unauthorised roadside encampments experienced throughout Newport. Council Officers must undertake a
welfare assessment when such an encampment arrives, and therefore we know the size, location and frequency of these encampments. It remains the case that the largest single family unit that stops while passing through Newport comprises 14 caravans, which corroborates the identified need for 7 transit pitches.

Test C2

It is acknowledged that the site at Hartridge Farm Road would be large. The assumption of 4 caravans per pitch is considered to be an exaggeration as the Council would be expecting an average of 2 static caravans per pitch. The Council will consider using planning conditions to limit the number of caravans per pitch and this could be controlled via tenancy agreements.

The Gypsy and Traveller Site at Shirenewton in Cardiff has 59 pitches. Cardiff County Council state that their experience in operating the Shirenewton site of 59 pitches has demonstrated that large sites can be very effectively managed providing both benefits for the Gypsy and Traveller community and enabling the effective delivery of supporting services (Cardiff Deposit LDP 2013 – para 5.46).

The size of the site is necessary to keep the individual families together. One family individually currently has an immediate housing need of 13 pitches, which is predicted to increase to 23 pitches by 2026. The Scrutiny Paper (May 2013) notes that the only site capable of accommodating this family in their entirety is Hartridge Farm Road. It is not desirable to split this family, as this could result in a challenge to the right to family life under the Human Rights Act.

As stated, it is accepted that engagement with the Gypsy and Traveller community has increased significantly since 2010. Input from this community was a key part of the Scrutiny Committee’s review of Gypsy and Traveller site provision starting in 2012, which has informed the Revised Deposit LDP. Information on views expressed by the Gypsy and Traveller community is included in Appendix 1 of the Scrutiny Committee and Cabinet reports, which are included as part of the LDP evidence base. In addition, Housing Officers met with the families to make them aware of the Scrutiny Committee review, identify their site criteria preferences, and explain how they could be involved in future public consultation, including the call for suggested sites. The community was then made aware of the public consultation when it commenced. In particular, the three families for whom a housing need has been identified have been formally consulted on the Scrutiny Committee’s conclusion, as requested by Cabinet on 13 May 2013. All adults (over 18) of each of the three families have been asked to indicate whether or not they would prefer to live on the Hartridge Farm Road site alongside the other two families, or if they would prefer one of the other options. The 24 adult family members were shown the draft indicative site layout plans to assist their understanding of the proposals. The Hartridge Farm Road site was unanimously identified as the preferred option by 21 adult family members present on one of the two occasions to vote. Three adult family members were unable to attend the vote due in one case to a work commitment and in two cases due to a recent family bereavement.

Scrutiny Committee and Cabinet gave careful consideration to the size of the proposed site, including the indicative layout to demonstrate that the layout could be designed to provide three discreet areas for the three families.

In addition to this, Council relations with the Gypsy/Traveller community have been an on-going and very regular process. Council Housing Staff visit families on a weekly basis and the Gwent Education Ethnic Minority Service (GEMMS) also work closely with the families in terms of schooling and education.

The statement which suggests that all rural sites were automatically rejected is refuted. All sites which fell within a C2 flood risk zone were rejected immediately, but sites which were considered more rural were considered further, but as your report notes, sites within or near to existing settlements should be considered first.

Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development. Ground re-profiling works will be required at both Hartridge Farm Road and the Former Ringland Allotments. This work will add to the development costs but is not considered to be insurmountable and does not make the sites unsuitable. This information was presented to the Scrutiny Committee and Cabinet in April 2013 and May 2013 respectively.

In terms of noise and privacy, for Hartridge Farm Road, the proposed layout would use screening to effectively create 3 independent sites within the curtilage of the whole site. The site would also be screened from the road and nearby residential properties. A noise assessment has been undertaken for the site and it is proposed that a 1.8m high noise attenuation fence is constructed adjacent to the RSPCA Centre, alongside the mainline railway and between the SDR and north-eastern part of the site. This work will add to the development costs but is not considered to be insurmountable and does not make the sites unsuitable. This information was presented to the Scrutiny Committee and Cabinet in April 2013 and May 2013 respectively.

For the Former Ringland Allotments, no concerns with regard to health implications of the pylons have been raised by Environmental Health or the Utility Providers. A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road. This work will add to the development costs but is not considered to be insurmountable and does not make the sites unsuitable. This information was presented to the Scrutiny Committee and Cabinet in April 2013 and May 2013 respectively.
With regard to the potential dangers associated with the underpass, it is agreed that the locking of the underpass is something that needs to be avoided in order to ensure access to local amenities.

TEST CE1

As noted in the report, most of this area has been covered in the section of TEST C1. Therefore our responses to C1 address these points.

TEST CE2

Newport does rely on the Fordham Assessment to identify its Gypsy/Traveller requirements, but this Assessment is the culmination of multiple pieces of work and research. It is not one single piece of standalone research.

To accommodate the families that the Council has a duty to accommodate, there is an immediate need for 23 residential pitches. This is noted with the background paper. The Council has identified its Gypsy/Traveller housing need via the Fordham Assessment and through subsequent research, liaison and assessment of Gypsy and Traveller families in Newport by Housing Officers. With regard to the 3 families:

Family A has an immediate need for 13 pitches, which is to increase to 23 pitches by 2026.

Family B has an immediate need for 3 pitches, which is to increase to 7 pitches by 2026.

Family C has an immediate need for 7 pitches, which is to increase to 13 pitches by 2026.

Newport considers that it has allocated sufficient space for Gypsy and Traveller need up to 2026 at Hartridge Farm Road.

As noted previously, the size of Hartridge Farm Road is sufficient to accommodate all three families. With one family requiring 23 pitches by 2026, there was no other suitable alternative site large enough to accommodate this family. Evidence has shown through the consultation process that the Gypsy/Traveller families are content to live alongside each other at Hartridge Farm Road.

The delivery of the site will be phased. The Plan notes 23 pitches being provided between 2011 and 2016; 10 pitches will be provided between 2016 and 2021 and the remaining 10 pitches are provided between 2021 and 2026. Therefore the statement in the report which notes that ‘the policy is to provide all the projected need of 43 pitches at once’, is incorrect. The Council will be responsible for building the site; therefore we will have control in relation to its delivery.

Following the completion of the first 23 pitches, if there is no demand for the additional 20 pitches, then they will not be built. The process would be the same for housing. A developer is unlikely to continue building properties where there is no demand.

In addition to the Fordham Report, our transit site need is based upon the evidence of unauthorised roadside encampments experienced throughout Newport. Council Officers must undertake a welfare assessment when such an encampment arrives, and therefore we know the size, location and frequency of these encampments. It remains the case that the largest single family unit that stops while passing through Newport comprises 14 caravans, which corroborates the identified need for 7 transit pitches.

It is considered that the Pembrokeshire approach would not be applicable to Newport due to our immediate need for 23 pitches.

The Council has a duty to provide accommodation for the Gypsy/Traveller population. We do not have a duty to provide land for livestock. The site will be owned and managed by the Council and there is no intention to allow the occupants to keep livestock on site.

With regard to Llanwern High, the site will be well screened and should not impact on Llanwern High School.

TEST CE3

The former Ringland Allotments were temporary allotments and were not statutory allotments. Temporary allotments are not protected from disposal in the same way that statutory allotments are.
There are currently no allotments on the site, but alternative allotment provision can be investigated if it is demonstrated there is insufficient allotment provision across Newport as a whole.

With regard to the RSPCA Centre at Hartridge Farm Road, the indicative layout of this site shows that a significant buffer could be provided between the RSPCA Centre and the pitches. The Road Safety Centre at the site would need to be relocated. It is understood that their lease has expired. The Council will assist with the relocation as best it can. This would be the case for any proposed use of the site.

The issue regarding flexibility of pitch provision is discussed under heading TEST CE2. As landowner and provider, the Council will be able to phase delivery at Hartridge Farm Road. This approach will provide sufficient flexibility in terms of delivering a site and meeting our Gypsy/Traveller accommodation requirements.

The report is incorrect in its statement that there is no monitoring with regard to Gypsy/Traveller provision. Chapter 12, the Monitoring Framework, includes a monitoring indicator to monitor the number of unauthorised encampments. The monitoring target is for no increases in unauthorised encampments year on year over 3 years. If this is not achieved, then the Council will need to investigate the causes and whether a policy review is required.
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1.0 INTRODUCTION

1.1 MSP are instructed by the Ringland Matters Group (‘the Group) to report on the Revised Deposit Newport Local Development Plan, (the ‘revised LDP‘) issued for consultation and comment to interested parties. The group has been set up to look at the proposed ‘allocation’ in the deposit LDP of the residential and transit gypsy and traveller sites at Hartridge Farm Road and the Ringland allotments. This report therefore looks at and assesses the gypsy and traveller aspects of the deposit LDP.

1.2. This report is made to the group and we acknowledge that it can be submitted to Newport City Council by the group as a duly made representation to the revised LDP.

1.3. In line with the requirements of the Local Development Plan Wales (LOPW) and its accompanying regulations 2005, this report sets out to apply the test of ‘soundness’. These tests are set out in terms of ‘procedural’; ‘consistency’ and ‘coherence and effectiveness’. In this assessment, the key tests of consistency and coherence and effectiveness have been looked at. We have not paid regard to procedural matters as they relate to compliance with the Delivery Agreement, the Community Involvement Scheme and Sustainability Appraisal and Strategic Environmental Assessment, which are matters for the Government to address.

1.4. However, one procedural matter that does arise is the issue concerning the issue of the revised LDP itself. This revision follows the placing on deposit of the LDP in its original form in 2012. In relation to the groups’ interest, that original deposit plan had gypsy and traveller site allocations on land well away from them and so had no effect to them at all. The revised LDP is said to be made by the Officers of the Council under regulation 17 of the 2005 LDP Regulations.

1.5 We have looked accordingly at part 17 of those regulations, which deal with how to make a deposit plan. We can find no provision in them for a revised LDP once it has been placed on deposit. Rather, any changes should be dealt with by way of ‘focused changes’ to the plan, whereby the appointed Inspector can only make changes to the plan, and these are by way of directions the Council must then follow. The Council has agreement from the Welsh Assembly that a revised LDP may be ‘the best way forward’, 1 but under the regulations there is no provision for such a revision to be made. Therefore the original deposit LDP should have gone forward to examination with its original gypsy site allocations. The group therefore believe that the revised deposit LDP has been ‘concocted’ by the newly elected Council and rushed through to avoid those newly elected members having a ‘gypsy’ site in their own wards. Thus the revision is a political one, not one based on the regulatory requirements. The group find therefore the revised ‘process’, particularly in relation to the gypsy and traveller site allocations to have been carried out ‘in a rush’ with encumbent shortfalls, which this report will highlight. We find this ‘rush’ unsurprising, given that Newport’s LDP production is far behind the originally intended four years from 2005, as set out in the 2005 regulations and is now one of the last to be produced in Wales.

2.0. THE TESTS OF SOUNDNESS

2.1. The Planning Acts require all LDP’s to be subject to an examination by an independent Inspector. That appointed Inspector will assess the soundness of the plan. That test of soundness relates to the policy content of the plan and the process for its production. Under these headings, there are ‘10’ tests identified against which the test of soundness will be applied 2-. We have identified five of those 10 tests which are applicable to the concerns of the group. These are:
- test C1 - regard to other development plans; policies and strategies of adjoining areas;
- test C2 - regard to national policy
- test CE1 - coherent strategy and compatibility with adjoining authorities;
- test CE2 - realistic having regard to alternatives and a robust evidence base and;
- test CE3 - evidence of implementation and monitoring

These tests we now go on to accordingly apply.

3.0. TEST C1

3.1. Section 225 of the Housing Act 2004 requires local authorities to assess the needs of gypsy and traveller accommodation. Guidance on how that is to be assessed sets out that is may be beneficial
3.2. Circular 30/2007 states that, following the guidance for Local Market Housing Assessments, the circular guidance strongly recommends that local authorities work in partnership with neighbouring authorities as travelling patterns are liable to cross local authority boundaries’ 5.

3.3. Despite the above national guidance, the Council's gypsy and traveller strategy in the revised LDP is based, almost solely, on the findings of the Fordham report, published in 2010. Having looked at that report, we can find no recommendation or assessment of any cross boundary working with adjacent authorities. This may because this aspect was not included in the Council’s brief to Fordhams. In any event that needs' report can only be used to inform the Council's policy, it is not the policy itself. However, the revised LDP policy appears to be based solely on it, thereby completely ignoring the policy advice of Government and thereby, in our view, failing to meet test C1 of the LDP regulations.

3.4. The Government's overall approach to gypsy and traveller provision has been assessed numerically, and this is estimated to be between 275 - 305 families to meet need and family increase to 2016. Whilst these figures can be further revised as a result of each local authority carrying out its own needs assessment, there is no paper, policy or report in the revised LDP which shows how provision in adjoining authorities or across the region or sub region has been taken into account, affects or otherwise the projected needs base for Newport or its gypsy -traveler provision. For example, in relation to the provision of transit sites, Circular 30/2007 makes it clear that such provision is an across boundary issue. We are aware, for example, that Cardiff is actively seeking a major transit site along the M4 corridor and yet in the revised LDP no account is taken as to whether or not such provision will meet the transit needs of Newport from such a site, which will be only a few miles away and on the major transport links through the region, therefore meeting transit needs. Without any such assessment, transit provision in this revised LDP is fundamentally flawed as it ignores the Government's approach to such provision. On permanent sites, the same applies. That is that the numbers required to be provided may (or may not) be affected by provision in adjoining or nearby authorities. No assessment is made, so the revised LDP assumptions on numbers required to be provided in the Newport area cannot be relied on as 'need' in the area, because there is no apparent basis to assess that need in the region. There is no assessment as to how the numbers of permanent pitches proposed for Newport in the revised LDP affect or otherwise the overall provision in the region, or Wales as a whole. It cannot therefore be known whether the overall targets identified by the Government's own assessment is met or whether an overprovision is made and whether that overprovision will result in immigration from other areas if such overprovision is made, to the detriment of Newport residents. We say there is a detriment 'because it is acknowledged that a gypsy or traveller site adjacent to existing housing will result in community disharmony 7.

4.0. TESTC2

4.1. The most obvious conflict with national policy in relation to gypsy and traveller sites in the revised LDP is the size of the permanent site proposed at Hartridge Farm Road. 43 pitches are proposed at the site, which could be the equivalent of 172 individual caravans (assuming 4 caravans per pitch). National guidance on site design of such sites set out quite clearly that they should ideally be no more than 12 pitches and taking into account local circumstances and need, no more than 15-20 pitches"8. The proposal at Hartridge Farm Road is over twice that recommended size, completely in conflict with that national guidance and therefore a failure of test C2.

4.2. We have had a look at the selection criterion used by the Council for site selection of gypsy and traveller sites. The actual criteria used by the Scruiny Review Assessment in 2012, relate to various points but none relate to site size 9. This is despite the fact that in that same paper, it is outlined that consultation by the Council with the gypsy and traveller community in 2010, revealed that a 'small site' was desirable (it is in fact placed at the top of the list10). This however appears to have been ignored. We can find no paper or report either in the LDP or its documents that sets out Why a site 3.5 times the size (43/12) of that recommended in Government guidance is proposed. This the Council is required to do if this part of the test C2 is to be met.

4.3. National policy requires that the gypsy and traveller community be involved at an early stage in the preparation of LDP's. The Council's Gypsy and Traveller accommodation background paper states that since 2010, the Council has dramatically increased its interaction with that community. However, we can find no papers to the revised LDP that set out what those consultations were, what questions or what options were put to that community. Thus that part of the LDP process is not transparent enough to enable other stakeholders, such as the community around the proposed residential site, to assess how extensive or appropriate that consultation has been or whether the proposed allocation reflects that community's desires and wants. Whilst this should be set out in the Community Involvement Scheme as part of the LDP process, we have still been unable to identify for example, if any of the suggested sites were put forward or proposed by that community. What is clear is that the Council's selection criterion used for the site selection does not have any criteria based on whether the gypsy and traveller community want the sites or not. That runs contrary to Government advice because it is not identified to what extent the sites put forward arise from work with the gypsy and traveller community, whether they are suitable for them or which, if any sites, are put forward by them. This should be made clear and transparent in the LDP and in accordance with Government advice11. Further, without such information being readily available and transparent, it cannot be relied upon as fully informing the LDP process and hence, site selection.

4.4. On the matter of site selection, the criterion the Council has used appear to be selectively ignoring Government guidance as to what, and what weight, should be attached to them. The criterion used for site selection in the first and second rounds relate primarily to avoiding environmentally sensitive areas, proximity principles (including settlement boundaries) and whether or not the sites are
 owned by the Council. 12 Circular 30/2007 sets out that in terms of site selection, sites in, or near, existing settlements should be considered first. However, it also states that rural settings are acceptable in principle. In such areas it states that over rigid application of national or LDP policies that seek a reduction in car bourne travel would not be appropriate13. It seems to us that the selection criteria used by the Council by applying the settlement boundary/rural exception criterion, discounts automatically this part of possible sites suitable in accordance with that Government guidance. In other words, all rural sites are dismissed. That is not what Government guidance says and so again, the selection process fails test C2 as no such sites have been considered.

4.5 National guidance on site constraint policies also seem to have been ignored on the sites selected in the revised LDP for gypsy and traveller accommodation. The transient site proposed at Llanwern is steeply sloping and has national grid pylons over it. Not only that, but the site sits on the side of one of the main, if not the main, arterial roads into and out of Newport. The site is clearly visible by users of that road. Placing the site here has the potential to undermine the well landscaped visual amenity of the rest of that route, to the detriment of the well being of Newport as a whole.

4.6 The Hartridge Road residential site has the main railway line along its southern border and the main SOR route to the north. This will create noise for that site unsuitable for residential occupation and be a potential hazard. Whilst there are underpasses under the DTR route, these are unpleasant and not used. Local knowledge confirms that they have been used as 'ambush sites' in the past. Planning guidance advises against putting such sites near hazards14.

5.0 TEST CE1

5.1 We have already largely covered the point of compatibility with adjoining authorities in the section on test C1, which is regard to be had to the development plans of adjoining authorities. We can find no report or assessment of any regard to what provision adjoining authorities are making for gypsy and traveller provision or how this may affect provision or otherwise of such sites in Newport. Whilst each authority has to make provision for its own communities it may contain, national guidance makes it clear that gypsy and travellers are a cross boundary issue and therefore any strategy should account for provision or otherwise in adjoining authorities .

5.2 It seems to us to be unsurprising that such a cross boundary approach has not been undertaken in the revised LDP. That is because the gypsy and traveller issue has only recently been tackled in the LDP evidence base since 2010 and given the priority of the Council to now issue its LDP (as it is far behind its timetable), the Council has simply taken the short route of applying directly the 'need' identified in the Fordham report and applied it to a single site.

5.3 Given that there is no evidence base showing how Newport's provision fits in with or is affected by adjoining authorities or how the provision for such sites fits in with the Government's projections for gypsy and traveller sites in Wales15, and there is no evidence of cooperation between Newport and any other authority16: this test is also failed.

6.0 TEST CE2

6.1 The revised LDP strategy for gypsy and travellers relies, almost solely, on the Fordham needs assessment. The strategy simply takes the findings of that report in terms of numbers and then finds a site big enough to accommodate it. That is not a realistic means of approaching a strategy for gypsy and traveller sites.

6.2 The Fordham report finds that the 'need' in Newport is for 29 additional residential pitches over the next 10 years17. The revised LOP strategy is to provide for 43 additional residential pitches18. This difference in numbers of pitches to be provided is only explained in the background paper as 'through this interaction' - that being interaction with the gypsy and traveller community since the production of the Fordham report in 2010. We can find no report or assessment in the LOP which explains how this figure is arrived at or why. The Fordham report arrives at the figure of 29 additional residential pitches as that includes an allowance of 25 pitches to accommodate need as it stands now and a 3% growth factor19. Even allowing for natural growth beyond 2019, as allowed for in the Fordham report, to 2026, the figure does not come anywhere near the 43 pitches put forward in the revised LOP. Without the evidence base to clearly show how this figure of 43 pitches is arrived at in the LOP, the base for it is not robust and is unrealistic, thereby failing test CE2.

6.3 The methodology for the revised LOP for gypsies and travellers is to place all the residential pitches on one site, namely Hartridge Farm Road. We can find no rational for why that method of dealing with this issue is adopted in the revised LOP as the methodology for doing so is not explained. Further the policy is to provide all the projected need of 43 pitches at once (the Council say the site will be 'phased' but we do not consider that to be realistic once the site is operational). Again it is not explained in the LOP documents why this should be the case. The Fordham report identifies that 25 additional pitches are needed in Newport over the next ten years. Of these, the Fordham report recommendations are that 14 pitches should be provided on social rented pitches (i.e. Council or public body owned) over the next five years.21 The policy for gypsy and traveller provision is not however designed in this way if all the pitches for the whole LDP period (including the extra 14 over and above the Fordham report to make the total of 43 pitches proposed) are to be provided on one site. We cannot see any control mechanism in the revised LOP to achieve phasing. It is more realistic that once the site is operational, it will simply 'fill up' from the start. This is especially so as such a large site will attract 'overspill' from adjacent authorities and we have already pointed out that that issue has not
6.4. It seems to us therefore that the revised LOP strategy for gypsy and traveller provision is not realistic in that it is not formulated to reflect the findings of the needs assessment. When looking at approaches in other areas, for example Pembrokeshire, the LDP, (which has been accepted as sound by an Inspector), their approach is to make some initial provision and then by review periodically, to have further sites if found to be needed. Thus the site provision is spread out on smaller sites over a longer period if shown to be needed by review. We are not aware that this revised LDP has considered, or it is not shown in the LDP documents, any alternative strategy for site provision over the plan period. This it could have done if the Fordham report had been interpreted differently. Thus the revised LOP is not realistic having regard to alternatives and thus the strategy adopted is not based on a robust evidence base. Test CE2 is also therefore failed.

6.5. The identified problem in the revised LOP strategy of providing the gypsy and traveller site ’en mass’ in those numbers at the Hartridge Farm Road site is that it will overwhelm the existing residential population there, which is small scale and rural in the lanes behind Llanwern High School. A traveller/gypsy site of this size, which will also have to provide on site employment facilities, strategy for traveller/gypsy provision, which as guidance suggests, ought to be formulated to allow better integration and inclusion with existing local communities.

7.0. TEST CE3

7.1. The LDP is required to show evidence of how the suggested sites are to be implemented and how they are to be monitored. The reason for the monitoring is so that the LDP can be adjusted to suit new or changing circumstances.

7.2. With regard to implementation of the Hartridge Farm Road site and the Ringland allotment site at Llanwern, obvious problems are evident for which we cannot find any evidence in the LDP as to how they are to be addressed. First, with regard to the transit/residential site at Llanwern, this is an allotment site. There is specific legislation covering allotments. They are the Small Holdings and Allotment Act 1908 and The Allotments Act 1925. In brief, these set out that land purchased by local authorities as allotments must not be disposed of without Ministerial Consent. We can find no evidence in the LOP of such consent being obtained. That consent requires provision to be made for allotment holders displaced. We can see nowhere in the LOP that allows for this. Further still, local authorities must assess the demand for allotments in the area and if there is, there is a statutory duty to provide them. Further still, allotments form part of the amenity provision of open and recreational space in an area. We can find no calculation as to whether the loss of the allotments to a transit/residential site use would lead to a shortfall of such provision in the area.

7.3. Second, as regards the residential site at Hartridge Farm Road, there are existing uses on that land which are the RSPCA and the Road Safety Centre. We understand these are on a long term lease from the Council. Lease provisions are set out in terms that they have to be renewed, unless the occupier chooses not to do so. We cannot find any reference in the LDP as to two these uses will be dealt with. Should they remain in situ, there will be conflict of use between them and the proposed residential gypsy/traveller site, particularly the RSPCA centre in terms of noise from animals, particularly dogs, much to the detriment of neighbours around the site.

7.4. The Welsh Assembly Government requires a biannual caravan count to be done in each local authority area24. The revised LDP policy with regard to gypsy and traveller sites proposes a ‘once and for all’ solution by placing all perceived ‘need’ on one residential site. This ‘up front’ loading of the policy does not allow for any variation in need that may occur over the plan period and this will be known as a result of the required caravan counts. This not only inflexible, but also no policies are allowed for in the revised LDP for possible adjustments, up or down, to numbers needed. The policy approach should, in our view, be aimed at providing the immediate 14 pitches on Council or public body owned land with the other 15 pitches provided on smaller private sites, as the Fordham report suggests. The additional pitches taking the number up to 43 should not be included at this stage, but a flexible policy introduced into the LDP to take account of the biannual counts. In this way, the swamping of an existing community by such a large residential site could be both avoided initially and dealt with as part of the review process of the LDP. This would allow for monitoring to take place. As the revised LDP policies do not so this, in our view, test CE3 is failed as there is no provision for monitoring in the revised LDP with regard to gypsy and traveller provision.

8.0. SUMMARY AND CONCLUDING REMARKS

8.1. In our review of the revised LDP with regard to gypsy and traveller provision, we have found a number of shortfalls as regards to the test of ‘soundness’ to be applied. As an overview, we are not surprised as looking at the overall process, it appears to us that the gypsy and traveller policy has attempted to be revised as part of the LDP process in a very tight timescale. This is not helped by the single residential site chosen to accommodate the perceived need which will result in one of the largest residential gypsy/traveller sites in Europe. This will totally swamp the existing local Hartridge community and such provision flies in the face of national policy for such sites with regard to size. Neither is the revised LDP further helped by the apparent dismissal in the site selection criterion of existing or unauthorised encampments or any site outside the urban boundary. That is not what Government guidance on this issue sets out. Further, we can see no evidence in the revised LDP of any
cross boundary liaison or any assessment as to how the policy put forward fits in with adjacent strategies or the regional picture of the provision for residential and, in particular, transit sites. Without that being done, we fail to see how the revised LDP can be judged to be sound as the evidence base used is not robust and cannot be relied on.

Footnotes:

1 email from Welsh Assembly to Newport Council dated 20th February 2013.
2 LDP Wales paragraph 4.32
3 paragraph 29 Local Market Housing Assessment Guide
4 paragraph 31 Local Market Housing Assessment Guide
5 paragraph 10 of Circular 30/2007
9 Gypsy and traveller sites background paper.
10 paragraph 3.7 Gypsy and traveller accommodation background paper.
11 see paragraph 18 of Circular 30/2007.
12 paragraph 3.8 Gypsy and Traveller sites background paper.
14 paragraph 3.2.2 Good Practice Guide in Designing Gypsy and Traveller Site in Wales
15 Good Practice Guide in Wales
16 Circular 30/2007 paragraph 23
17 paragraph 26 Gypsy and Traveller Accommodation Assessment 2010. (the Fordham Report).
18 paragraph 204 Gypsy and Traveller background paper.
19 table 8.1 the 'Fordham' report.
20 paragraph 8.9 the 'Fordham' report.
21 paragraph 9.2 Fordham report
22 paragraph 8 Circular 30/2007
23 Section 8 Allotments Act 1925
24 Introduced following the Accommodation Needs of Gypsy and Travellers in Wales 2006

### Speaking at Public Examination

All matters raised because 1. Highly emotive subject. 2. The large number of representations submitted (over 4,000)

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<th>Item Question</th>
<th>Council Responses</th>
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The Revised Deposit Local Development Plan is a revised version of the Deposit Plan, made under Regulation 17 of the 2005 LDP Regulations. The term ‘Revised’ is used to make it clear to interested parties that it is different to the April 2012 Deposit Plan that they may have already commented on, and to make it clear that the original Deposit Plan had been changed. There is no limit on the number of times that a Council can issue a Deposit Plan under Regulation 17.

Following the original LDP being placed on deposit in 2012, the Council received numerous representations which required changes to be made to the Plan.

The circular letter to all Local Planning Authorities in Wales dated 10 June 2009, entitled ‘Important Guidance on Procedures for Advertising Focussed Changes to the Deposit LDP’, defines focussed changes as ‘changes that reflect key pieces of evidence but do not go to the heart of the plan, affecting only limited parts of it’.

The letter continues by noting that ‘if the local planning authority is considering making fundamental changes that affect the strategy and are of such a significant nature and scale as to go to the heart of the plan, it will need to give considerable thought as to how the plan can be taken forward’.

In consultation with Welsh Government, the Council considered that the changes it wanted to make to the Plan were too significant; therefore ‘focussed changes’ were not considered appropriate. The Council decided to amend the Plan and return to the ‘deposit stage’. The term ‘Revised Deposit’ simply attempts to distinguish it from the original 2012 Plan. This course of action was agreed by the Welsh Government and is clearly set out in the Delivery Agreement approved by the Minister.

The allegation that the Revised Deposit LDP was ‘concocted’ and rushed through “to avoid those newly elected members having a gypsy site in their wards” is simply not borne out by the facts. The five sites within the original Deposit Plan were located in Lliswerry, Marshfield and Bettws wards. As a result of the local government elections in May 2012, the political representation did not change for Lliswerry or Marshfield wards, and Bettws ward went from a Labour majority to no overall control. The selection of the preferred new sites makes it clear that the Scrutiny Committee review was not based upon political issues but upon sound land use planning.

Test C1

As part of the Fordham Assessment research, interviews were conducted with neighbouring Authorities in order to discuss and establish the impact of cross-boundary movements. The outcomes were factored into the conclusions and recommendations of the Assessment.

The Fordham Assessment also refers to a sub-regional Local Housing Market Assessment which was conducted for Blaenau Gwent, Monmouthshire, Newport and Torfaen in 2007. The second volume contains a chapter looking at the housing needs of Gypsies and Travellers across the study area.

In addition to this, the Fordham Assessment also references the South East Wales Racial Equality Council (SEWREC) Report which provides a detailed history of the connections between Gypsies and Travellers and the old county of Gwent. It is of particular value because it provides the locations of frequently used unauthorised sites in Gwent, which has helped inform the Fordham Assessment.

The South East Wales Regional Planning Group (SEWSPG) was founded shortly after devolution and discusses regional and cross-boundary planning policy matters. Planning Officers from Newport Council have actively attended these meetings since the group’s formation. In addition, Housing Officers from Newport Council attend Welsh Government run regional meetings regarding Gypsy and Traveller accommodation.

Notwithstanding the above, the Council must provide sites to meet the need identified for families within its area that require accommodation. Sites should be allocated within the relevant Authority's area, not in a neighbouring Authority, in the same way as each Authority is required to meet its bricks and mortar housing needs within its own LDP. The residential allocation at Hartridge Farm Road will be designed to accommodate three families who currently reside within Newport's administrative boundary and have done so for years and decades in some instances. The Council has a clear duty to house these families.

There have been informal discussions with South East Wales Authorities about establishing a regional network of transit sites, however there is clear evidence that a transit site is needed within Newport. The Musker Summer Report notes that Cardiff is actively seeking a major transit site along the M4 corridor, but in Cardiff's published deposit LDP, there is no provision for a transit site.

In addition to the Fordham Report, our transit site need is based upon the evidence of unauthorised roadside encampments experienced throughout Newport. Council Officers must undertake a
welfare assessment when such an encampment arrives, and therefore we know the size, location and frequency of these encampments. It remains the case that the largest single family unit that stops while passing through Newport comprises 14 caravans, which corroborates the identified need for 7 transit pitches.

Test C2

It is acknowledged that the site at Hartridge Farm Road would be large. The assumption of 4 caravans per pitch is considered to be an exaggeration as the Council would be expecting an average of 2 static caravans per pitch. The Council will consider using planning conditions to limit the number of caravans per pitch and this could be controlled via tenancy agreements.

The Gypsy and Traveller Site at Shirenewton in Cardiff has 59 pitches. Cardiff County Council state that their experience in operating the Shirenewton site of 59 pitches has demonstrated that large sites can be very effectively managed providing both benefits for the Gypsy and Traveller community and enabling the effective delivery of supporting services (Cardiff Deposit LDP 2013 – para 5.46).

The size of the site is necessary to keep the individual families together. One family individually currently has an immediate housing need of 13 pitches, which is predicted to increase to 23 pitches by 2026. The Scrutiny Paper (May 2013) notes that the only site capable of accommodating this family in their entirety is Hartridge Farm Road. It is not desirable to split this family, as this could result in a challenge to the right to family life under the Human Rights Act.

As stated, it is accepted that engagement with the Gypsy and Traveller community has increased significantly since 2010. Input from this community was a key part of the Scrutiny Committee’s review of Gypsy and Traveller site provision starting in 2012, which has informed the Revised Deposit LDP. Information on views expressed by the Gypsy and Traveller community is included in Appendix 1 of the Scrutiny Committee and Cabinet reports, which are included as part of the LDP evidence base. In addition, Housing Officers met with the families to make them aware of the Scrutiny Committee review, identify their site criteria preferences, and explain how they could be involved in future public consultation, including the call for suggested sites. The community was then made aware of the public consultation when it commenced. In particular, the three families for whom a housing need has been identified have been formally consulted on the Scrutiny Committee’s conclusion, as requested by Cabinet on 13 May 2013. All adults (over 18) of each of the three families have been asked to indicate whether or not they would prefer to live on the Hartridge Farm Road site alongside the other two families, or if they would prefer one of the other options. The 24 adult family members were shown the draft indicative site layout plans to assist their understanding of the proposals. The Hartridge Farm Road site was unanimously identified as the preferred option by 21 adult family members present on one of the two occasions to vote. Three adult family members were unable to attend the vote due in one case to a work commitment and in two cases due to a recent family bereavement.

Scrutiny Committee and Cabinet gave careful consideration to the size of the proposed site, including the indicative layout to demonstrate that the layout could be designed to provide three discreet areas for the three families.

In addition to this, Council relations with the Gypsy/Traveller community have been an on-going and very regular process. Council Housing Staff visit families on a weekly basis and the Gwent Education Ethnic Minority Service (GEMMS) also work closely with the families in terms of schooling and education.

The statement which suggests that all rural sites were automatically rejected is refuted. All sites which fell within a C2 flood risk zone were rejected immediately, but sites which were considered more rural were considered further, but as your report notes, sites within or near to existing settlements should be considered first.

Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development. Ground re-profiling works will be required at both Hartridge Farm Road and the Former Ringland Allotments. This work will add to the development costs but is not considered to be insurmountable and does not make the sites unsuitable. This information was presented to the Scrutiny Committee and Cabinet in April 2013 and May 2013 respectively.

In terms of noise and privacy, for Hartridge Farm Road, the proposed layout would use screening to effectively create 3 independent sites within the curtilage of the whole site. The site would also be screened from the road and nearby residential properties. A noise assessment has been undertaken for the site and it is proposed that a 1.8m high noise attenuation fence is constructed adjacent to the RSPCA Centre, alongside the mainline railway and between the SDR and north-eastern part of the site. This work will add to the development costs but is not considered to be insurmountable and does not make the sites unsuitable. This information was presented to the Scrutiny Committee and Cabinet in April 2013 and May 2013 respectively.

For the Former Ringland Allotments, no concerns with regard to health implications of the pylons have been raised by Environmental Health or the Utility Providers. A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road. This work will add to the development costs but is not considered to be insurmountable and does not make the sites unsuitable. This information was presented to the Scrutiny Committee and Cabinet in April 2013 and May 2013 respectively.
With regard to the potential dangers associated with the underpass, it is agreed that the locking of the underpass is something that needs to be avoided in order to ensure access to local amenities.

TEST CE1

As noted in the report, most of this area has been covered in the section of TEST C1. Therefore our responses to C1 address these points.

TEST CE2

Newport does rely on the Fordham Assessment to identify its Gypsy/Traveller requirements, but this Assessment is the culmination of multiple pieces of work and research. It is not one single piece of standalone research.

To accommodate the families that the Council has a duty to accommodate, there is an immediate need for 23 residential pitches. This is noted with the background paper. The Council has identified its Gypsy/Traveller housing need via the Fordham Assessment and through subsequent research, liaison and assessment of Gypsy and Traveller families in Newport by Housing Officers. With regard to the 3 families:

Family A has an immediate need for 13 pitches, which is to increase to 23 pitches by 2026.

Family B has an immediate need for 3 pitches, which is to increase to 7 pitches by 2026.

Family C has an immediate need for 7 pitches, which is to increase to 13 pitches by 2026.

Newport considers that it has allocated sufficient space for Gypsy and Traveller need up to 2026 at Hartridge Farm Road.

As noted previously, the size of Hartridge Farm Road is sufficient to accommodate all three families. With one family requiring 23 pitches by 2026, there was no other suitable alternative site large enough to accommodate this family. Evidence has shown through the consultation process that the Gypsy/Traveller families are content to live alongside each other at Hartridge Farm Road.

The delivery of the site will be phased. The Plan notes 23 pitches being provided between 2011 and 2016; 10 pitches will be provided between 2016 and 2021 and the remaining 10 pitches are provided between 2021 and 2026. Therefore the statement in the report which notes that ‘the policy is to provide all the projected need of 43 pitches at once’, is incorrect. The Council will be responsible for building the site; therefore we will have control in relation to its delivery.

Following the completion of the first 23 pitches, if there is no demand for the additional 20 pitches, then they will not be built. The process would be the same for housing. A developer is unlikely to continue building properties where there is no demand.

In addition to the Fordham Report, our transit site need is based upon the evidence of unauthorised roadside encampments experienced throughout Newport. Council Officers must undertake a welfare assessment when such an encampment arrives, and therefore we know the size, location and frequency of these encampments. It remains the case that the largest single family unit that stops while passing through Newport comprises 14 caravans, which corroborates the identified need for 7 transit pitches.

It is considered that the Pembrokeshire approach would not be applicable to Newport due to our immediate need for 23 pitches.

The Council has a duty to provide accommodation for the Gypsy/Traveller population. We do not have a duty to provide land for livestock. The site will be owned and managed by the Council and there is no intention to allow the occupants to keep livestock on site.

With regard to Llanwern High, the site will be well screened and should not impact on Llanwern High School.

TEST CE3

The former Ringland Allotments were temporary allotments and were not statutory allotments. Temporary allotments are not protected from disposal in the same way that statutory allotments are.
There are currently no allotments on the site, but alternative allotment provision can be investigated if it is demonstrated there is insufficient allotment provision across Newport as a whole.

With regard to the RSPCA Centre at Hartridge Farm Road, the indicative layout of this site shows that a significant buffer could be provided between the RSPCA Centre and the pitches. The Road Safety Centre at the site would need to be relocated. It is understood that their lease has expired. The Council will assist with the relocation as best it can. This would be the case for any proposed use of the site.

The issue regarding flexibility of pitch provision is discussed under heading TEST CE2. As landowner and provider, the Council will be able to phase delivery at Hartridge Farm Road. This approach will provide sufficient flexibility in terms of delivering a site and meeting our Gypsy/Traveller accommodation requirements.

The report is incorrect in its statement that there is no monitoring with regard to Gypsy/Traveller provision. Chapter 12, the Monitoring Framework, includes a monitoring indicator to monitor the number of unauthorised encampments. The monitoring target is for no increases in unauthorised encampments year on year over 3 years. If this is not achieved, then the Council will need to investigate the causes and whether a policy review is required.

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Document: Revised LDP, p.76
Policy: H16

Summary: Petition submitted objecting to proposed Gypsy and Traveller site at Hartridge Farm Road

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<td>Soundness Test</td>
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Separate Representation submitted.

We the undersigned wish to register our objection to the Gypsy and Traveller site proposed at Hartridge Farm Road, Ringland. Newport for the reasons as attached and further authorise the body known as the Ringland Matters Group to represent me/us in any subsequent relevant representations relating to the aforementioned proposed site.

All matters raised because: 1. Highly emotive subject. 2. Large number of representations submitted (over 4,000)
### Representation Details

**Rep'n/Para/Policy**: 3982.L4/H16  
**Representor**: Ringland Matters Group  
**Agent**: Musker Sumner Partnership  
**Accession No**: 26/07/2013  
**Date Lodged**: 07/2013  
**Late?**: P  
**Source**: O  
**Type**: I  
**Mode**: M  
**Status**: M  
**Status Modified**:  

**Document**: Revised LDP, p.76  
**Policy**: H16  
**Summary**: Allocation of the site at Hartridge Farm Road objected, reconsideration of previously rejected sites.

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| 10   | Soundness Test    |                                                                                                               As an overview, the Ringland Matters Group perceives the overall process of the gypsy and traveller sites policy has attempted to be revised as part of the LDP process in a very tight timescale and puts in question the soundness of the Councils process (as clearly explained in a separate representation from the Group). This is not helped by the single residential site chosen to accommodate the perceived need which will result in one of the largest residential sites in Europe. This provision flagrantly flaunts the national policy for such sites neither is the revised LDP further helped by the apparent dismissal in the site selection criterion of existing or unauthorised encampments or any site outside the urban boundary. We feel this is not what Government guidance on this issue sets out. We would, therefore like to see the plan changed as follows:  
1. Reconsideration of sites previously rejected by the Council on what is perceived by many as inappropriate grounds such as:  
   • The Former Speedway  
   • Glan Lyn  
   • Army Camp/Barracks Pye Corner  
   • Tatton Road area (where a temporary traveller site exists) with a view to make it remote from the existing pylons.  
   • The existing traveller site in Goldcliffe where a traveller site has existed for some 43 years yet is now deemed as unsustainable.  
   Some of these sites, along with others not mentioned above, have previously been nominated and have had a level of preference from both travellers and the settled community and yet have been rejected for what is still perceived as inappropriate reasons.  
2. Consider any other site that has the capacity to accommodate each of the individual families, a preferred option of the travellers. It should be noted that of the eleven short listed sites only one site was capable of accommodating the two larger of the three families.  
3. The Council work with Groups such as ours (as a group we have now requested that we be registered as a statutory consultee on LDP matters with regard to traveller sites) and the travelling community to assist in the selection to ensure a level of fairness for all.  
4. Not to reject sites on the basis they appear to be impractical but to view them on the basis ‘can they be made to work’.  
5. Relate to cost as not necessarily in money terms but the cost of the effects on people in terms of health and well being, again of both travellers and the settled community. |
### Representation Details

**Rep'n/Para/Policy** | **Representor** | **Agent** | **Accession No** | **Date Lodged** | **Late?** | **Source** | **Type** | **Mode** | **Status** | **Status Modified**
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12 12 | Speaking at Public Examination | Yes | 12 12 | 12/02/2014 |  |  |  |  |  |  

**Item Question**

- **Soundness of LDP**

**Council Responses**

Alternative gypsy/traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

The Council will continue to consult Ringland Matters on LDP process as requested.

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Document: Revised LDP, p.76
Policy: H16.01
Summary: Object to proposed Gypsy and Traveller site at Hartridge Farm Road.
We the undersigned wish to register our objection to the Gypsy and Traveller site proposed at Hartridge Farm Road. Our reasons are summarised as follows:

Size - The proposed size of the site is unimaginable and is far outside the Welsh Assembly Government's Guidelines and Good Practice. The site is intended to have up to 43 pitches with each pitch having up to 3 to 4 caravans. This will make this site not just the biggest in Britain but the biggest in Europe. Such a development will not be in the interest of residents or travellers alike wherever that area is located and will not be in the interest of Newport itself. Further a site of this scale will not encourage the integration of travellers within the community but is likely to have the opposite effect. Therefore the proposal itself is inconceivable.

Layout - The proposed layout is contrary to the good faith of the Welsh Assembly Government's Guidelines and Good Practice. To take a single large site and split it into three sites to house all three families flagrantly contravenes the guidelines and will dominate the immediate small community. It is also unfair to the travellers as they do not want communal sites as it will promote conflict within the families as well as likely to infringe the human rights of both the travellers and the immediate communities alike.

Location - This site is not suitable and other sites are more suitable. The location of the site is regarded by the Travellers themselves as unsuitable as they have justifiable concerns being too close to Llanwern High School with regard to conflict. Their preference is to be more remote. Further consideration should be given other sites such as the former speedway site, and similar, that have previously been nominated by both travellers and non-travellers alike, and to those sites identified in the existing Local Development Plan as being more favourable. The revised version of the plan does not give due consideration to the alternative sites available, nor does it provide sustainable reasons for rejecting those previously preferred. In the revised draft plan, the Council have favoured sites to the east of Newport as the preferred locations. Travellers have expressed no such preference and are more concerned that selection should be based on the suitability of each individual site.

Current use - The Road Safety Centre is the focal point of contact for all road safety education, training and publicity service in Newport and surrounding area. To lose this facility would be a great loss to Newport as some courses in particular develop an understanding of behaviour and attitude and build confidence in the students (especially those of low attainment) themselves and many go on to a career in motor maintenance and the like from the experience and knowledge they have gained. Further, the Centre is within walking distance for the Llanwern High School pupils.

Proximity to Sewage Pumping Station - This site is located within a close proximity to a sewage pumping station. There may be health implications linked to the airborne particles produced by these stations.

Access - This site has restricted access along a lane adjacent to two schools. The schools attract a tremendous amount of traffic at peak times while Hartridge Farm Road alongside the houses there are no footpaths, no street lighting and the road narrows to just 15 feet. The road leading up to the site is in poor condition and barely suits its current needs. This would need extensive and costly refurbishment. The Policy Review Group has already identified and recorded vehicle access issues for the triangular site but is now choosing to ignore it.

Llanwern High School - Because of parents' perception of traveller sites, rightly or wrongly, it would undermine the Council's strategy of improving education in the east of the city. (Prior to the building of the new High School parents were reluctant to send their children to the old Hartridge School, choosing St Julian's, Caerleon, Caldicot or Chepstow Schools instead). The remarkable transformation of the new building and the look, attitude and pride of the pupils has changed that. However, all the good work put into the new school could be undermined and the impressive new Llanwern High School could become a very expensive, underused, facility.

Ysgol Gymraeg Casnewydd - Again because of parents' perception of traveller sites, rightly or wrongly, parents are likely to reconsider their choice of school for their children. This would undermine further the already fragile financial position of the school thus deterring future needed investment.

Financial Matters - The Council's financial strategy will also be undermined because the proposed site is designated for building and the capital receipts used to offset the cost of the new Llanwern School and so reduce the Council's debt.

RSPCA Centre - For years the RSPCA Centre and the residents have co-existed amicably. The dogs are rarely noisy, unless they are disturbed. They would be constantly disturbed if there was a traveller site next door. This would result in stressed animals and residents, including the travellers themselves. RSPCA staff and volunteers daily exercise the dogs but say they could not risk walking their nervous, abandoned charges past a traveller site.
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<tr>
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<tr>
<td>Land Presentation</td>
<td>The topography of this site, as it stands, is not totally suitable for the proposed use. Again the Policy Review Group has already identified and recorded that the topography of the triangular site is unsuitable but is now choosing to ignore it.</td>
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<td>Amenities</td>
<td>Access to local amenities is via an underpass to Ringland. This underpass has in the past been often locked due to safety and antisocial behaviour issues. Such issues are likely to be considerably exacerbated by the proposed development thus putting travellers and their families at risk. The Travellers themselves have also expressed concerns.</td>
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<td>Noise</td>
<td>As the site is adjacent the busy main railway line there will be noise problems that will be a particular issue for caravans. A noise attenuation fence is proposed here but due to the level of noise will be of little effect.</td>
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<td>Potential danger caused by animals</td>
<td>It is well known that many traveller families may keep a stock of ponies and horses now or in the future. There are many well documented examples of these animals escaping their confines. An animal of this nature running out onto the Railway, SDR or found wandering through the adjacent Schools or neighbouring Ringland Estate or Ilanwern Village will undoubtedly cause issues and even cost lives in the case of the Railway or SDR.</td>
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<td>The site will be highly visible from the busy mainline railway and would potentially create a poor image of Newport.</td>
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<td>The Process</td>
<td>The Scrutiny Report dated 29th October, 2012 and, consequently, accepted by Cabinet on 12th November 2012 is inconsistent, biased, is incomplete in its assessments made and offers no analytical evidence of the preferences made for the selection of travellers sites as claimed. The Policy Review Group recommendations display a lack of understanding of the Travellers needs which was further reinforced by a member of the Policy Review Group during Full Council on 4th June 2013 displaying a serious lack of understanding of what constitutes a Travellers Site thus casting further, serious, doubt on the integrity of the aforementioned report they produced.</td>
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In conclusion this site is neither suitable for the provision of traveller sites nor is such a massive site, the biggest in Europe, in the interest of Newport. Further the integrity of the Policy Review Group's Report, recommendations and conclusions are questionable for the reasons given. Moreover, there are no sound reasons for removing the sites previously proposed.
It is acknowledged that the size of the Hartridge Farm Road site is larger than Welsh Government guidance suggests, however this will avoid the need to split any of the individual families, which is an important factor for the families themselves. The size is sufficient to accommodate all 3 families, which would meet Newport’s residential need for Gypsy/Traveller provision. The proposed layout would use screening to effectively create 3 independent sites within the curtilage of the whole site. The site would also be screened from the road and nearby residential properties.

The site is within the settlement boundary and considered to be a sustainable location. Remote locations outside of the settlement boundary have poorer access to amenities and place more of an emphasis on car travel, therefore deemed to be more unsustainable. Site design can ensure it is well screened from the nearby RSPCA Centre and Llanwern High School.

The Road Safety Centre at the site would need to be relocated. The Council will assist with the relocation as best it can. This would be the case for any proposed use of the site.

With regards to the proximity to Sewage Pumping Station, no concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

It is acknowledged that the Hartridge Farm Road site will require improvements to the access road including the provision of a length of pavement. This will be agreed as part of a planning application and is not considered insurmountable.

The site will be well screened and should not impact on Llanwern High School or Ysgol Gymraeg Casnewydd. Perception of Gypsy/Travellers at the Schools is something that the Council will need to address through interaction with the Head Teacher and Governors.

The Council is aware of the financial implications to its budget.

The draft indicative layout of this site shows that a significant buffer could be provided between the RSPCA Centre and the pitches.

Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development. Ground re-profiling works will be required at Hartridge Farm Road and the work will add to the development costs, but is not considered insurmountable.

It is agreed that the locking of the underpass is something that needs to be avoided in order to ensure access to local amenities. The site is also within a short walk from Newport Retail Park.

A noise assessment has been undertaken for Hartridge Farm Road. It is proposed that a 1.8m high noise attenuation fence is constructed adjacent to the RSPCA Centre, alongside the mainline railway and between the SDR and north-eastern part of the site.

The Council has a duty to provide accommodation for the gypsy/traveller population. We do not have a duty to provide land for horses. The site will be owned and managed by the Council and there is no intention to allow the occupants to keep horses on site.

A noise attenuation fence will be constructed alongside the mainline railway and the area will be well screened.

The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.
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Document: Revised LDP, p.76
Policy: H16.02
Summary: Object to proposed Gypsy and Traveller site at Former Ringland Allotments

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We the undersigned wish to register our objection to the Gypsy and Traveller site proposed at The Former Ringland Allotments, Ringland, Newport for the reasons as attached and further authorise the body known as the Ringland Matters Group to represent me/us in any subsequent relevant representations relating to the aforementioned proposed site (4,997 signatures - hard copy petition)
Health Issues and Pylons - No concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

Location - The site is adjacent to the settlement boundary and considered to be a reasonably sustainable location. More remote locations that are further outside of the settlement boundary have poorer access to amenities and place more of an emphasis on car travel, therefore deemed to be more unsustainable.

Land Presentation – Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development. The results of these surveys have confirmed that some ground re-profiling works will be required at the Former Ringland Allotments. This work will add to the development costs but is not considered to be insurmountable.

Access – Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

Existing Use – There are no allotments on the site. Alternative allotment provision can be investigated if it is demonstrated there is insufficient allotment provision across Newport as a whole.

Aspect – A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

Highway Safety - Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

Environmental – The Council Strategy is a Brownfield led strategy and preference is given to sites which are previously developed. A number of greenfield sites are within the Plan as they are considered appropriate and well located for development. This is why this site is included.

Amenities - It is agreed that the locking of the underpass is something that needs to be avoided in order to ensure access to local amenities.

Flooding – Flood risk at this site is not considered to be a significant risk.

Financial Implications – The Council is aware of the potential financial implications of going ahead with the site. Gallagher Estates have planning permission for their major development in close proximity to the site and although they have submitted representations of concern, they are currently continuing to submit information to enable them to discharge planning conditions and get on site and build.

Privacy and Noise - A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

Potential danger caused by animals - The Council has a duty to provide accommodation for the Gypsy/Traveller population. We do not have a duty to provide land for horses. The site will be owned by the Council and there is no intention to allow the occupants to keep horses on site.

The Process – The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.

Crime/Perception of Crime – As with any other significant development, the Council has liaised with the police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the police if any incidents of crime that relate to the site are reported.

Alternative Sites – Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

House Prices – The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.
As an overview, the Ringland Matters Group perceives the overall process of the gypsy and traveller sites policy has attempted to be revised as part of the LDP process in a very tight timescale and puts in question the soundness of the Council’s process (as clearly explained in a separate representation from the Group). This is not helped by the single residential site chosen to accommodate the perceived need which will result in one of the largest residential sites in Europe. This provision flagrantly flaunts the national policy for such sites neither is the revised LDP further helped by the apparent dismissal in the site selection criterion of existing or unauthorised encampments or any site outside the urban boundary. We feel this is not what Government guidance on this issue sets out.

We would, therefore like to see the plan changed as follows:

1. Reconsideration of sites previously rejected by the Council on what is perceived by many as inappropriate grounds such as:
   • The Former Speedway
   • Glen Llyn
   • Army Camp/Barracks Pye Comer
   • Tatton Road area (where a temporary traveller site exists) with a view to make it remote from the existing pylons.
   • The existing traveller site in Goldcliffe where a traveller site has existed for some 43 years yet is now deemed as unsustainable.

Some of these sites, along with others not mentioned above, have previously been nominated and have had a level of preference from both travellers and the settled community and yet have been rejected for what is still perceived as inappropriate reasons.

2. Consider any other site that has the capacity to accommodate each of the individual families, a preferred option of the travellers. It should be noted that of the eleven short listed sites only one site was capable of accommodating the two larger of the three families.

3. The Council work with Groups such as ours (as a group we have now requested that we be registered as a statutory consultee on LDP matters with regard to traveller sites) and the travelling community to assist in the selection to ensure a level of fairness for all.

4. Not to reject sites on the basis they appear to be impractical but to view them on the basis ‘can they be made to work’.

5. Relate to cost as not necessarily in money terms but the cost of the effects on people in terms of health and well being, again of both travellers and the settled community.
### Representation Details

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Document: Revised LDP, p. 76
Policy: H16.02
Summary: Objection to proposed Gypsy and Traveller site at Former Ringland Allotments

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Item Question  Representation Text
We the undersigned wish to register our objection to the Gypsy and Traveller site proposed at the Former Ringland Allotments.

Our reasons are summarised as follows:

Council guidelines - Part of the original 220 site survey quoted that this site was unsuitable due to there being "Pylons on site and unsuitable access", this hasn't changed and remains a major issue. This is one of the main reasons the travellers themselves do not want to occupy this site.

Health issues related to pylons - There are numerous well documented papers relating to the health consequences of living near to electricity pylons. A study of childhood cancers recorded between 1963 and 1995 in England and Wales revealed that there is an increase in risk of children contracting leukaemia of 69% if they live within 200m of a power line and 23% if they live within 600m of a power line.

Location - The Council have favoured sites to the east of Newport as the preferred location. Travellers have expressed no such preference as to the location and are more concerned as to establishing a selection on suitability not location.

Land presentation - This site is not on level ground. The site is on a gradient unsuitable for siting caravans.

Access - Access to this would be shared with the proposed 1100 houses of Gallagher development which would increase traffic many fold on what is effectively a country lane. The turning in and out of the site by vehicles would be problematic given the location of the land and the fact that the road turns directly off from the 50mph limit SDR. The Council has previously identified this land in part for the provision of a roundabout which would then create an access to the proposed site directly off or close to that roundabout. Such a situation at other possible sites has been condemned by both the Police and Highway Authorities.

Existing use - The allotment site is still a Statutory Allotment site and is not surplus to the requirement of the residents.

Aspect - The site is highly visible from the A48 so would potentially create a very poor image of Newport as this is one of the major routes into the city. The site would afford no privacy for families living there.

Safety - The A48 is a very busy major route into Newport and has a 50mph speed limit and the regular movement of heavy goods vehicles. Caravans and trailers would severely worsen the road safety situation.

Environmental - Council guidelines dictate that when selecting sites priority should be given to Brown Field. This area is an undeveloped green field site which is outside current development boundaries and currently provides a green wedge.

Amenities - Access to local amenities is via an underpass to Dawson Close in Ringland. This underpass has previously had to be locked on a regular basis due to safety and antisocial behaviour issues. Such issues are likely to be considerable exacerbated by the proposed development. The access to the underpass is also often affected by flooding during periods of heavy rain.

Flooding - The A48 is often affected by flooding due to run off of surface water from the site and this would be exacerbated by the proposed development. Pooling water on a main access route with a 50mph speed limit creates a considerable safety hazard.

Financial Implications - The development of adjacent land for housing by Gallagher Estates would be very unlikely to go ahead if a Gypsy and Traveller site were provided on this land. This would be a loss to the City of amongst other things the payment of the 106 agreement.

Privacy - Due to the closeness of the SDR and the openness of the site there would be privacy issues.

Noise - Due to the closeness of the SDR there would be a noise issue.
Potential danger caused by animals - it is well known that many traveller families keep a stock of ponies and horses. There are also many well documented examples of these animals escaping their confines. An animal of this nature running out onto the SDR or found wandering through the neighbouring Ringland Estate will undoubtedly cause issues and even cost lives in the case of the SDR.

The Process - The Scrutiny Report dated 29th October, 2012 and, consequently, accepted by Cabinet on 12th November 2012 is inconsistent, biased, is incomplete in its assessments made and offers no analytical evidence of the preferences made for the selection of travellers sites as claimed. The Policy Review Group recommendations display a lack of understanding of the Travellers needs which was further reinforced by a member of that Review Group, during the Full Council meeting dated 4 June 2013, displaying a serious lack of understanding of what constitutes a travellers site thus casting further, serious, doubt on the integrity of the aforementioned report they produced.

In conclusion this site is unsuitable for the provision of a traveller site. Further the integrity of the Policy Review Group's Report, recommendations and conclusions are questionable for the reasons given. Moreover, there are no sound, sustainable, reasons for removing the sites previously proposed.
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Health Issues and Pylons - No concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

Location - The site is adjacent to the settlement boundary and considered to be a reasonably sustainable location. More remote locations that are further outside of the settlement boundary have poorer access to amenities and place more of an emphasis on car travel, therefore deemed to be more unsustainable.

Land Presentation – Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development. The results of these surveys have confirmed that some ground re-profiling works will be required at the Former Ringland Allotments. This work will add to the development costs but is not considered to be insurmountable.

Access – Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

Existing Use – There are no allotments on the site. Alternative allotment provision can be investigated if it is demonstrated there is insufficient allotment provision across Newport as a whole.

Aspect – A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

Highway Safety - Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

Environmental – The Council Strategy is a Brownfield led strategy and preference is given to sites which are previously developed. A number of greenfield sites are within the Plan as they are considered appropriate and well located for development. This is why this site is included.

Amenities - It is agreed that the locking of the underpass is something that needs to be avoided in order to ensure access to local amenities.

Flooding – Flood risk at this site is not considered to be a significant risk.

Financial Implications – The Council is aware of the potential financial implications of going ahead with the site. Gallagher Estates have planning permission for their major development in close proximity to the site and although they have submitted representations of concern, they are currently continuing to submit information to enable them to discharge planning conditions and get on site and build.

Privacy and Noise - A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

Potential danger caused by animals - The Council has a duty to provide accommodation for the Gypsy/Traveller population. We do not have a duty to provide land for horses. The site will be owned by the Council and there is no intention to allow the occupants to keep horses on site.

The Process – The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.

Crime/Perception of Crime – As with any other significant development, the Council has liaised with the police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the police if any incidents of crime that relate to the site are reported.

Alternative Sites – Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

House Prices – The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.

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Petition of 270 signatures

Document: Revised LDP, p.76

Policy: H16.02

Summary: Online petition objecting to proposed Gypsy and Traveller site at Former Ringland Allotments.
Dear Sir/Madam,

We the undersigned wish to register our objection to the Gypsy and Traveller site proposed at the Former Ringland Allotments.

Our reasons are summarised as follows:

Council guidelines - Part of the original 220 site survey quoted that this site was unsuitable due to there being “Pylons on site and unsuitable access”, this hasn’t changed and remains a major issue. This is one of the main reasons the travellers themselves do not want to occupy this site.

Health issues related to pylons - There are numerous well documented papers relating to the health consequences of living near to electricity pylons. A study of childhood cancers recorded between 1963 and 1995 in England and Wales revealed that there is an increase in risk of children contracting leukaemia of 69% if they live within 200m of a power line and 23% if they live within 600m of a power line.

Location - The Council have favoured sites to the east of Newport as the preferred location. Travellers have expressed no such preference as to the location and are more concerned as to establishing a selection on suitability not location.

Land presentation - This site is not on level ground. The site is on a gradient unsuitable for siting caravans.

Access - Access to this would be shared with the proposed 1100 houses of Gallagher development which would increase traffic many fold on what is effectively a country lane. The turning in and out of the site by vehicles would be problematic given the location of the land and the fact that the road turns directly off from the 50mph limit SDR. The Council has previously identified this land in part for the provision of a roundabout which would then create an access to the proposed site directly off or close to that roundabout. Such a situation at other possible sites has been condemned by both the Police and Highway Authorities.

Existing use - The allotment site is still a Statutory Allotment site and is not surplus to the requirement of the residents.

Aspect - The site is highly visible from the A48 so would potentially create a very poor image of Newport as this is one of the major routes into the city. The site would afford no privacy for families living there.

Safety - The A48 is a very busy major route into Newport and has a 50mph speed limit and the regular movement of heavy goods vehicles. Caravans and trailers would severely worsen the road safety situation.

Environmental - Council guidelines dictate that when selecting sites priority should be given to Brown Field. This area is an undeveloped green field site which is outside current development boundaries and currently provides a green wedge

Amenities - Access to local amenities is via an underpass to Dawson Close in Ringland. This underpass has previously had to be locked on a regular basis due to safety and antisocial behaviour issues. Such issues are likely to be considerable exacerbated by the proposed development. The access to the underpass is also often affected by flooding during periods of heavy rain.

Flooding - The A48 is often affected by flooding due to run off of surface water from the site and this would be exacerbated by the proposed development. Pooling water on a main access route with a 50mph speed limit creates a considerable safety hazard.

Financial Implications - The development of adjacent land for housing by Gallagher Estates would be very unlikely to go ahead if a Gypsy and Traveller site were provided on this land. This would be a loss to the City of amongst other things the payment of the 106 agreement.

Privacy - Due to the closeness of the SDR and the openness of the site there would be privacy issues.
Noise - Due to the closeness of the SDR there would be a noise issue.

Potential danger caused by animals - it is well known that many traveller families keep a stock of ponies and horses. There are also many well documented examples of these animals escaping their confines. An animal of this nature running out onto the SDR or found wandering through the neighbouring Ringland Estate will undoubtedly cause issues and even cost lives in the case of the SDR.

The Process - The Scrutiny Report dated 29th October, 2012 and, consequently, accepted by Cabinet on 12th November 2012 is inconsistent, biased, is incomplete in its assessments made and offers no analytical evidence of the preferences made for the selection of travellers sites as claimed. The Policy Review Group recommendations display a lack of understanding of the Travellers needs which was further reinforced by a member of that Review Group, during the Full Council meeting dated 4 June 2013, displaying a serious lack of understanding of what constitutes a travellers site thus casting further, serious, doubt on the integrity of the aforementioned report they produced.

In conclusion this site is unsuitable for the provision of a traveller site. Further the integrity of the Policy Review Group’s Report, recommendations and conclusions are questionable for the reasons given. Moreover, there are no sound, sustainable, reasons for removing the sites previously proposed.

Item Question Council Responses
Health Issues and Pylons - No concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

Location - The site is adjacent to the settlement boundary and considered to be a reasonably sustainable location. More remote locations that are further outside of the settlement boundary have poorer access to amenities and place more of an emphasis on car travel, therefore deemed to be more unsustainable.

Land Presentation – Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development. The results of these surveys have confirmed that some ground re-profiling works will be required at the Former Ringland Allotments. This work will add to the development costs but is not considered to be insurmountable.

Access – Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

Existing Use – There are no allotments on the site. Alternative allotment provision can be investigated if it is demonstrated there is insufficient allotment provision across Newport as a whole.

Aspect – A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

Highway Safety - Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

Environmental – The Council Strategy is a Brownfield led strategy and preference is given to sites which are previously developed. A number of greenfield sites are within the Plan as they are considered appropriate and well located for development. This is why this site is included.

Amenities - It is agreed that the locking of the underpass is something that needs to be avoided in order to ensure access to local amenities.

Flooding – Flood risk at this site is not considered to be a significant risk.

Financial Implications – The Council is aware of the potential financial implications of going ahead with the site. Gallagher Estates have planning permission for their major development in close proximity to the site and although they have submitted representations of concern, they are currently continuing to submit information to enable them to discharge planning conditions and get on site and build.

Privacy and Noise - A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

Potential danger caused by animals - The Council has a duty to provide accommodation for the Gypsy/Traveller population. We do not have a duty to provide land for horses. The site will be owned by the Council and there is no intention to allow the occupants to keep horses on site.

The Process – The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.

Crime/Perception of Crime – As with any other significant development, the Council has liaised with the police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the police if any incidents of crime that relate to the site are reported.

Alternative Sites – Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

House Prices – The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.
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**Document:** Revised LDP, p.76

**Policy:** H16.01

**Summary:** Online petition submitted objecting to proposed Gypsy and Traveller site at Hartridge Farm Road with 474 signatures

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*Item Question*  
*Representation Text*
We the undersigned wish to register our objection to the Gypsy and Traveller site proposed at Hartridge Farm Road.

Our reasons are summarised as follows:

**Size** - The proposed size of the site is unimaginable and is far outside the Welsh Assembly Government’s Guidelines and Good Practice. The site is intended to have up to 43 pitches with each pitch having up to 3 to 4 caravans. This will...

We the undersigned wish to register our objection to the Gypsy and Traveller site proposed at Hartridge Farm Road.

Our reasons are summarised as follows:

**Size** - The proposed size of the site is unimaginable and is far outside the Welsh Assembly Government’s Guidelines and Good Practice. The site is intended to have up to 43 pitches with each pitch having up to 3 to 4 caravans. This will make this site not just the biggest in Britain but the biggest in Europe. Such a development will not be in the interest of residents or travellers alike wherever that area is located and will not be in the interest of Newport itself. Further a site of this scale will not encourage the integration of travellers within the community but is likely to have the opposite effect. Therefore the proposal itself is inconceivable.

**Layout** - The proposed layout is contrary to the good faith of the Welsh Assembly Government’s Guidelines and Good Practice. To take a single large site and split it into three sites to house all three families flagrantly contravenes the guidelines and will dominate the immediate small community. It is also unfair to the travellers as they do not want communal sites as it will promote conflict within the families as well as likely to infringe the human rights of both the travellers and the immediate communities alike.

**Location** - This site is not suitable and other sites are more suitable. The location of the site is regarded by the Travellers themselves as unsuitable as they have justifiable concerns being too close to Llanwern High School with regard to conflict. Their preference is to be more remote. Further consideration should be given to the alternative sites available, as well as the human rights of both the travellers and the immediate communities alike.

**Current use** - The Road Safety Centre is the focal point of contact for all road safety education, training and publicity service in Newport and surrounding area. To lose this facility would be a great loss to Newport as some courses in particular develop an understanding of behaviour and attitude and build confidence in the students (especially those of low attainment) themselves and many go on to a career in motor maintenance and the like. Further, the Centre is within walking distance for the Llanwern High School pupils.

**Proximity to Sewage Pumping Station** - This site is located within a close proximity to a sewage pumping station. There may be health implications linked to the airborne particles produced by these stations.

**Access** - This site has restricted access along a lane adjacent to two schools. The schools attract a tremendous amount of traffic at peak times while Hartridge Farm Road alongside the houses there are no footpaths, no street lighting and the road narrows to just 15 feet. The road leading up to the site is in poor condition and barely suits its current needs. This would need extensive and costly refurbishment. The Policy Review Group has already identified and recorded vehicle access issues for the triangular site but is now choosing to ignore it.

**Llanwern High School** - Because of parents' perception of traveller sites, rightly or wrongly, it would undermine the Council's strategy of improving education in the east of the city. (Prior to the building of the new High School parents were reluctant to send their children to the old Hartridge School, choosing St Julian's, Caerleon, Caldicot or Chepstow Schools instead). The remarkable transformation of the new building and the look, attitude and pride of the pupils has changed that. However, all the good work put into the new school could be undermined and the impressive new Llanwern High School could become a very expensive, underused, facility.
Ysgol Gymraeg Casnewydd - Again because of parents’ perception of traveller sites, rightly or wrongly, parents are likely to reconsider their choice of school for their children. This would undermine further the already fragile financial position of the school thus deterring future needed investment.

Financial Matters - The Council’s financial strategy will also be undermined because the proposed site is designated for building and the capital receipts used to offset the cost of the new Llanwern School and so reduce the Council’s debt.

RSPCA Centre - For years the RSPCA Centre and the residents have co-existed amicably. The dogs are rarely noisy, unless they are disturbed. They would be constantly disturbed if there was a traveller site next door. This would result in stressed animals and residents, including the travellers themselves. RSPCA staff and volunteers daily exercise the dogs but say they could not risk walking their nervous, abandoned charges passed a traveller site.

Land Presentation - The topography of this site, as it stands, is not totally suitable for the proposed use. Again the Policy Review Group has already identified and recorded that the topography of the triangular site is unsuitable but is now choosing to ignore it.

Amenities - Access to local amenities is via an underpass to Ringland. This underpass has in the past been often locked due to safety and antisocial behaviour issues. Such issues are likely to be considerably exacerbated by the proposed development thus putting travellers and their families at risk. The Travellers themselves have also expressed concerns.

Noise - As the site is adjacent the busy main railway line there will be noise problems that will be a particular issue for caravans. A noise attenuation fence is proposed here but due to the level of noise will be of little effect.

Potential danger caused by animals - it is well know that many traveller families may keep a stock of ponies and horses now or in the future. There are many well documented examples of these animals escaping their confines. An animal of this nature running out onto the Railway, SDR or found wandering through the adjacent Schools or neighbouring Ringland Estate or Llanwern Village will undoubtedly cause issues and even cost lives in the case of the Railway or SDR.

Aspect - The site will be highly visible from the busy mainline railway and would potentially create a poor image of Newport.

The Process - The Scrutiny Report dated 29th October, 2012 and, consequently, accepted by Cabinet on 12th November 2012 is inconsistent, biased, is incomplete in its assessments made and offers no analytical evidence of the preferences made for the selection of travellers sites as claimed. The Policy Review Group recommendations display a lack of understanding of the Travellers needs which was further reinforced by a member of the Policy Review Group during Full Council on 4th June 2013 displaying a serious lack of understanding of what constitutes a Travellers Site thus casting further, serious, doubt on the integrity of the aforementioned report they produced.

In conclusion this site is neither suitable for the provision of traveller sites nor is such a massive site, the biggest in Europe, in the interest of Newport. Further the integrity of the Policy Review Group’s Report, recommendations and conclusions are questionable for the reasons given. Moreover, there are no sound reasons for removing the sites previously proposed.
Council Response

It is acknowledged that the size of the Hartridge Farm Road site is larger than Welsh Government guidance suggests, however this will avoid the need to split any of the individual families, which is an important factor for the families themselves. The size is sufficient to accommodate all 3 families, which would meet Newport’s residential need for Gypsy/Traveller provision. The proposed layout would use screening to effectively create 3 independent sites within the curtilage of the whole site. The site would also be screened from the road and nearby residential properties.

The site is within the settlement boundary and considered to be a sustainable location. Remote locations outside of the settlement boundary have poorer access to amenities and place more of an emphasis of car travel, therefore deemed to be more unsustainable. Site design can ensure it is well screened from the nearby RSPCA Centre and Llanwern High School.

The Road Safety Centre at the site would need to be relocated. The Council will assist with the relocation as best it can. This would be the case for any proposed use of the site.

With regards to the proximity to Sewage Pumping Station, no concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

It is acknowledged that the Hartridge Farm Road site will require improvements to the access road including the provision of a length of pavement. This will be agreed as part of a planning application and is not considered insurmountable.

The site will be well screened and should not impact on Llanwern High School or Ysgol Gymraeg Casnewydd. Perception of Gypsy/Travellers at the Schools is something that the Council will need to address through interaction with the Head Teacher and Governors.

The Council is aware of the financial implications to its budget.

The draft indicative layout of this site shows that a significant buffer could be provided between the RSPCA Centre and the pitches.

Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development. Ground re-profiling works will be required at Hartridge Farm Road and the work will add to the development costs, but is not considered insurmountable.

It is agreed that the locking of the underpass is something that needs to be avoided in order to ensure access to local amenities. The site is also within a short walk from Newport Retail Park.

A noise assessment has been undertaken for Hartridge Farm Road. It is proposed that a 1.8m high noise attenuation fence is constructed adjacent to the RSPCA Centre, alongside the mainline railway and between the SDR and north-eastern part of the site.

The Council has a duty to provide accommodation for the gypsy/traveller population. We do not have a duty to provide land for horses. The site will be owned and managed by the Council and there is no intention to allow the occupants to keep horses on site.

A noise attenuation fence will be constructed alongside the mainline railway and the area will be well screened.

The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.
### Representation Details

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**Document:** Revised LDP, p.75  
**Policy:** H15.01  
**Summary:** Petition of signatures objecting to proposed Gypsy and Traveller site at Celtic Way.

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**Item Question**  
**Representation Text**

11  11  Representation  
We the undersigned, object to the proposal by Newport City Council to site a Gypsy and traveller site at Celtic Way, Coedkernew.

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**Item Question**  
**Council Responses**

13  13  Council Response  
Objection noted.

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
### Representation Details

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Petition of 174 signatures

Document: Revised LDP, p.75

Policy: H15.01

Summary: Petition (signatures and letter) objecting to proposed Gypsy and Traveller site at Coedkernew
Following consultation with the community we, the undersigned write within the Consultation Period due to expire at 5pm 26th July 2013 to object to the proposal for a Gypsy / Traveller transit site at Celtic Way, Coedkernew, Newport. Our objections are detailed below:

**Business**

Objective 3 of the LOP states "to enable a diverse economy that meets the needs of the people of Newport and those of the wider South East Wales economic region". We do not consider the LDP meets the criteria in locating the Gypsy/Traveller transit site at Celtic Way and is in fact contradictory to the LDP as follows:

- Section 6.5 (page 78) states that "there is a medium sized prestige business park development can be supported at Duffryn".
- Section 6.6 (page 79) states "there is a large scale strategic development area well connected to the M4, containing some of the most prestigious developments in Newport...there are some areas of potential development on this prestigious site".
- Section 2.67 (page 33) "the sites in west Newport are close to major arterial routes which make them well connected nationally, regionally and locally. Substantial development has already occurred in the area...business advantages in locating near to similar uses".

Newport is an economically deprived area and we are fortunate to have attracted some major employers to the Celtic Springs and Imperial Park Business Parks for which there were compulsory purchases of land to acquire the full site for the LG Development (Wales Audit Office Protecting Public Money in the LG Project, Newport 13th March 2007 p26). This is a Tier 2 Government funded area that attracts companies to S.E.Wales, bringing jobs and rate payers. We are concerned that the existing local businesses have suggested that they would have to seriously consider plans for future expansion and potentially even consider relocating with the loss of employment and resulting in a significant impact on the local economy.

John McCooey the Financial Director for Quinn Radiators made it very clear at the LDP presentation with NCC on Tuesday 9th July that it would prove very difficult for him to justify and support an expansion to the existing business alongside a Travellers transit site. It is likely to prevent, under the same premise, new businesses being attracted to the area and would have a negative impact on employment, local economy and on NCC funding. There remain vacant buildings and sites available for occupation and it is important that NCC retain the highest quality business environment in order that Newport and S.E.Wales may attract further high quality corporate investors.

The proposal to allocate the land at Celtic Way for a proposed Gypsy / Traveller Site demonstrates a significant inconsistency with national and regional planning policy.

**Health and Safety**

The Welsh Government states clearly in their document Designing Gypsy and Traveller sites Good Practice Guide 2008 the following:

- Section 3.1 (page 14) "It is essential to ensure that the location of a site will provide a safe environment for the residents. Sites should not be situated near...industrial processes or other hazardous places...to ensure health and safety of prospective residents is not at risk".
- Section 8.4 (page 44) "the presence of children on the site and potential health and safety risk for them and other residents should receive equal consideration for transit sites".
- Section 3.10 (page 15) "sites adjacent to light industrial areas therefore tend not to be popular...because of safety fears".

We feel the proposed site at Celtic Way does not satisfy the above criteria as follows:

- 24/7 access of HGV and commercial vehicles to existing commercial premises.
- Movement of employee personal vehicles on a 24/7 basis.
- No pavements so pedestrian access is via a road with a 40 mph speed limit.
- The road and surrounding areas have poor street lighting.
- The main Cardiff to Newport dual carriageway is within 0.5 miles.
- An electricity substation is within 0.3 miles.
- The main Cardiff to London railway is within 0.5 miles.
- The area is known locally as 'Celtic lakes' with 13 areas of open water within 680m with a total surface water area of 38276m2. The nearest being only 22m away from the proposed site.
There are also 3.6 miles of reens and drainage ditches within 0.5 miles. The Environment Agency UK 2006 state that most drownings are due to "unfamiliar surroundings" which will be an increased risk for a Gypsy/Traveller transit site. The LDP proposes developments of the business park and surrounding infrastructure up to 2026. Primarily the SDR extension and major redevelopment of M4 Junction 28 would make the immediate area a constant 'construction site' posing a further hazard to vulnerable people in portable accommodation as they travel within traffic management systems with additional heavy plant and live within a dust and noise polluted environment.

In addition to these points, the Gwent Police report within the Gypsy and Traveller Site: Site Appraisal and Scrutiny Review appendx 4 (page 46) referencing the proposed site states "...this site would not be appropriate for children unless they are confined within the boundary of the site, due to the volume of traffic and heavy goods vehicles in this area...children playing outside the boundary would be in danger and could be disruptive to the flow of traffic" which we feel would be a significant risk in such an area. Therefore based on the Gwent Police report the proposed 'soft landscape boundaries' and without permanently closed gates it would be impossible to protect children within the transit site from inadvertently wandering into any number of the hazardous areas we have referenced above.

Education

We also identify that the Gypsy and Traveller Site; Site Appraisal and Scrutiny Review Guide says that schooling is required for all Gypsy/Traveller children. However having reviewed Newport Government schools admission figures for September 2013 all schools within a 3 miles radius of the proposed site at Celtic Way are full. However, schools within the catchment area of the proposed sites at Ringland and A449 have vacancies for 2013. Whilst we recognise that 2013 admissions would not be relevant, the assumption is that admissions figures will likely follow this trend in the coming years.

Environment

Within the Gypsy and Traveller Site: Site Appraisal and Scrutiny Review appendx 4 (page 46) the Gwent Police report raises concerns for "unauthorised expansion onto the unoccupied land to the east of the site. Unoccupied land to the south of the site and across Ouffryn lane could also be vulnerable to unauthorised use". As the Travellers are unfamiliar with the area, they may not be aware that their immediate surroundings are an SSSI and floodplain. The prospect of unauthorised expansion could have a serious environmental impact on the SSSI and without clear management plans we are unable to comment on how the NCC expect to contain expansion and prevent pollution and a negative impact on the precious drainage waterways of Celtic lakes and wider Severn Basin.

Closing comments

We believe the detailed objections above are valid reasons why the proposed site at Celtic Way does not comply with the Welsh Government Gypsy Traveller Good Practice Guide. We strongly oppose a deadline of Spm 26th July 2013 for public consultation on a proposal and supporting document, which lacks sufficient detail including management, security and health & safety assessments. Please be informed that as a community, we are taking professional advice regarding our legal rights under the localism Act 2011 and will respond in due course. We are also obtaining information supporting our objections under the Freedom of Information Act from multiple parties including the Newport County Council, the Welsh Government, the Gwent Police Authority and the South Wales Fire and Rescue Service. This information dearly will not be available prior to the deadline for the public consultation, but will be presented should further public consultations and hearings be held regarding the proposed Gypsy/Traveller transit site at Celtic Way.
It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

The proposal is for a transit site providing temporary short-term accommodation, rather than a permanent place to live. In this context, the adjacent land uses to the Celtic Way site are not considered to be hazardous, however it is agreed that they are not suitable places for children to play. The indicative layout of the transit site will include green areas for play and therefore children will have onsite facilities.

The site will be designed as a transit site and therefore only used by Gypsy/Travellers on a temporary basis as they pass through Newport. It is expected that the Gypsy/Travellers will use their vehicles to move around and there will be limited activity in terms of moving around the area on foot. Therefore the fact there is poor street lighting and a lack of pavement is not considered to be a significant concern. Increased street lighting could be provided if Members consider it to be essential.
### Document: Revised LDP, p.75

**Policy:** General G&T  
**Summary:** Propose alternative Gypsy and Traveller site at A449 and comment on suitability of Tredegar House Caravan Park.

#### 11 11 Representation

**Representor:** Coedkernew/Duffryn Residents Group  
**Petition of 174 signatures**

The LDP June 2013 Assessment Table of the proposed site at A449 under heading vehicular access issues raises no access issues which contradicts the information provided at the LDP Presentation on the revised LDP as to why the A449 was removed from the LDP.

The southbound access is only 185 yards from the merge nose (75 yards). Northbound the slip road leaving the A449 is 420 yards long (stopping sight distance) to the merge nose which adds a further 75 yards to the full length of the slip road (total of 495). We would also note that the A449 has numerous parking bays used on a daily basis by HGV's, cars and towing vehicles. None of these bays have a slip road or traffic calming measures but are deemed acceptable.

It would appear the A449 proposal was deleted from the LDP based on a Brief Desk Top Study noted in the "brief desk top assessment of the proposals, comments may alter on completion of a detailed site assessment and are therefore given without prejudice". The site at A449 already has existing water and sewage facilities, which would once again support the local authority's duty of careful management of tax payer's money. We strongly advise NCC to review the criteria and reasons as to why the A449 was deleted from the IOP with a view of reinstating it as the preferred location.

In addition to the existing proposed site, I / we don't understand why the traveller and the gypsy community cannot stay on a caravan site that is available for anyone in the caravan owning community. As this site on the west side of Newport is owned by NCC, is 960m from the proposed site and meets all the requirements for Gypsy/Traveller transit sites as presented by the local planning department at the LDP presentation. This managed and secure site can offer caravan pitches to the travelling community and anyone else in the caravan owning fraternity, ensuring that there is no discrimination between these communities and at no additional expense to NCC or to tax payers. By identifying that anyone with a caravan can use this site, the NCC will then have leverage to immediately move on any illegal encampments within Newport without extensive and costly legal implications.
With regards to the A449 site, the Assessment Table referred to in the representation was undertaken at the initial stages of the assessment to gain a strategic overview of the 240 sites. At that time access was considered to be achievable, however, as the site was looked at in more detail and consultation was undertaken with stakeholders it became apparent that access was an issue and the site was therefore discounted.

The Caravan Park is privately owned site. The Council has a duty to provide gypsy and traveller accommodation in its area.

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.
### Representation Details

**Representor**: Baulch, Mr Clifford  
**Accession No**: 3984.L1/H16.02  
**Date Lodged**: 26/07/2013  
**Status**: M

**Document**: Revised LDP, p.76  
**Policy**: H16.02  
**Summary**: Objection to proposed Gypsy and Traveller site at Former Ringland Allotment.

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I am writing to register my objection to the Gypsy and Traveller sites proposed at the Former Ringland Allotments.

My reasons are summarised as follows:

Council guidelines - Part of the original 220 site survey quoted that this site was unsuitable due to there being "Pylons on site and unsuitable access"; this hasn't changed.

Health issues related to pylons - There are numerous well documented papers relating to the health consequences of living near to electricity pylons. A study of childhood cancers recorded between 1963 and 1995 in England and Wales revealed that there is an increase in risk of children contracting leukaemia of 69% if they live within 200m of a power line and 23% if they live within 600m of a power line.

Land presentation - This site is on level ground. The site is on a steep gradient totally unsuitable for siting caravans. Access - Access to this would be shared with the proposed 1100 houses of Gallagher development which would increase traffic many fold on what is effectively a country lane. The turning in and out of the site by vehicles would be problematic given the location of the land and the fact that the road turns directly off from the 50mph limit SDR.

Aspect - The site is highly visible from the A48 so would potentially create a very poor image of Newport as this is one of the major routes into the city. The site would afford no privacy for families living there. Safety - The A48 is a very busy major route into Newport and has a 50mph speed limit and the regular movement of lorries, caravans and trailers would severely worsen the road safety situation.

Environmental - Council guidelines dictate that when selecting sites priority should be given to Brownfield. This area is an undeveloped green field site which is outside current development boundaries and currently provides a green wedge.

Amenities - Access to local amenities is via an underpass to Dawson Close in Ringland. This underpass has previously had to be locked on a regular basis due to safety and antisocial behaviour issues. Such issues are likely to be considerable exacerbated by the proposed development. The access to the underpass is often affected by flooding during periods of heavy rain.

Flooding - The A48 is often affected by flooding due to run off of surface water from the site and th is would be exacerbated by the proposed development. Pooling water on a main access route with a 50mph speed limit creates a considerable safety hazard.

Financial implications - The development of adjacent land for housing by Gallagher Estates would be very unlikely to go ahead if a Gypsy and Traveller site were provided on this land. This would be a loss to the City of amongst other things the payment of the 106 agreement.

Privacy - Due to the closeness of the SDR and the openness of the site there would be privacy issues.

Noise - Due to the closeness of the SDR there would be a noise issue.

Potential danger caused by animals - it is well known that many traveller families keep a stock of ponies and horses. There are also many well documented examples of these animals escaping their confines. An animal of this nature running out onto the SDR or found wandering through the neighbouring Ringland Estate will undoubtedly cause issues and even cost lives in the case of the SDR.

The Report - The Scrutiny Report dated 29th October, 2012 and, consequently, accepted by Cabinet on 12th November 2012 is inconsistent, incomplete in its assessments made and offers no analytical evidence of the preferences made for focal changes.

To sum up, I am of the strong opinion that this site is not in the slightest bit suitable for the provision of homes for gypsy traveller families. Fortunately the former Speedway site offers a much more suitable alternative. Moreover, there are no sound reasons for removing the sites previously proposed. Even the Welsh Assembly agreed that they were acceptable.

Fly Tipping and Violence.
13 13 Council Response

Health Issues and Pylons - No concerns with regard to health implications have been raised by Environmental Health or the Utility Providers.

Location - The site is adjacent to the settlement boundary and considered to be a reasonably sustainable location. More remote locations that are further outside of the settlement boundary have poorer access to amenities and place more of an emphasis on car travel, therefore deemed to be more unsustainable.

Land Presentation – Topographical surveys were undertaken for those sites where the existing topography appeared to present a challenge to site development. The results of these surveys have confirmed that some ground re-profiling works will be required at the Former Ringland Allotments. This work will add to the development costs but is not considered to be insurmountable.

Access – Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

Existing Use – There are no allotments on the site. Alternative allotment provision can be investigated if it is demonstrated there is insufficient allotment provision across Newport as a whole.

Aspect – A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road.

Highway Safety - Highways have not raised the access to the site as a major obstacle. Further refinement will be necessary during the detailed application process, however this is not considered to be insurmountable.

Environmental – The Council Strategy is a Brownfield led strategy and preference is given to sites which are previously developed. A number of greenfield sites are within the Plan as they are considered appropriate and well located for development. This is why this site is included.

Amenities - It is agreed that the locking of the underpass is something that needs to be avoided in order to ensure access to local amenities.

Flooding – Flood risk at this site is not considered to be a significant risk.

Financial Implications – The Council is aware of the potential financial implications of going ahead with the site. Gallagher Estates have planning permission for their major development in close proximity to the site and although they have submitted representations of concern, they are currently continuing to submit information to enable them to discharge planning conditions and get on site and build.

Privacy and Noise - A 2.5m high noise attenuation barrier is required alongside the SDR. This will help to create privacy and screen the development from the road. Potential danger caused by animals - The Council has a duty to provide accommodation for the Gypsy/Traveller population. We do not have a duty to provide land for horses. The site will be owned by the Council and there is no intention to allow the occupants to keep horses on site.

The Process – The Scrutiny Process considered over 240 sites and consulted extensively. This process was in addition to the LDP process, therefore the Council has gone further than what statutory guidelines have stated. The Scrutiny Process is considered to be a thorough exercise which has fed into the formal LDP Process.

Crime/Perception of Crime – As with any other significant development, the Council has liaised with the police in respect to this site and will continue to consult throughout the detailed design process. The site will be well managed and the Council will ensure it works closely with the police if any incidents of crime that relate to the site are reported.

Alternative Sites – Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.

House Prices – The Council has not undertaken a report to look at the possible implications of house prices in areas close to the proposed gypsy/traveller site. The Site will be authorised and well managed and research suggests that these sites have nothing like the disadvantages for neighbours which many anticipate before their creation.
Representation Details

Document: Revised LDP, p. 52
Policy: CE04
Summary: Seeks amendment to the environmental space designation on Land at Newport High School Old Boys RFC

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<table>
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<td>Representation</td>
<td>Seeks an amendment to the environmental space designation on Land at Newport High School Old Boys RFC. Please refer to the accompanying cover letter and Annex for further details</td>
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<th>Council Responses</th>
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</thead>
<tbody>
<tr>
<td>13</td>
<td>Council Response</td>
<td>The environmental space allocation is considered appropriate as the rugby pitches are used for leisure activities and are therefore protected.</td>
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Accession No: 3985.L1/CE04
Date Lodged: 06/08/2013
Agent: Geraint John Planning
Type: E O I M

Additional material submitted - Please click here
Redrow Homes Ltd

Geraint John Planning

06/08/2013

Accession No: 3985.L2//H01

Document: Revised LDP, p.65

Policy: H01

Summary: Seek increase in the overall housing numbers - adding Land at Newport High School Old Boys RFC

Soundness Test

C2, CE1, CE2, CE3, CE4
Land at Newport High School Old Boys Rugby Football Club, Caerleon

Please find enclosed, on behalf of and under instruction from Redrow Homes Ltd, representations to the Deposit LDP.

This submission:
• puts forward an Alternative Site Representations; and
• objects to selected policy provisions of the plan.

For the Alternative Site Representation, the following information is (as required) enclosed:
• completed, signed and dated Deposit Plan Response Forms;
• a Sustainability Appraisal
• Red line plan.

Furthermore, and as an Annex to this letter, a detailed case (providing a critique of the current provisions of the plan and suggested changes to its content) is included, in support of, and to make the case for the inclusion of the Alternative Sites; and suggested changes to the provisions of the Plan’s policies.

The Annex addresses the following issues, and is structured accordingly:
• Summary of the overall position adopted – as an executive summary of the case being made;
• Consideration of housing supply by the Plan, at the overall / plan-wide area;
• An Assessment of the Suitability of the Settlement for Development;
• An Assessment of the Suitability of Site for Development;
• A Summary of the Suitability of Sites for Development;
• Requested / recommended changes to the Plan.

Given the detailed nature of these representations our client would be happy to discuss any aspect of the submission made and credentials of the site when your Authority (and the appointed Inspector in turn) comes to evaluate matters. Appearance at the Public Examination in due course is also considered necessary and beneficial.

We respectfully urge, for the reasons given herein and in the associated submitted information / supporting material, to allocate the sites put forward.

Enc’s:
• Completed Deposit LDP Response Form
  o Representation Regarding Policy SP5 Countryside
  o Representation Regarding Policy SP10 Residential Requirement
  o Representation Regarding Policy H1 Housing Supply
  o Representation Regarding Policy CE4 Environmental Spaces and Corridors

• Site Location Plan

• Completed Sustainability Appraisal

• Indicative Site Concept Plan

Annex

Preface

This Annex sets out the detailed case in support of these representations.

It provides both a critique of the current provisions of the plan, and suggested changes to its content.

The representations are structured as follows:
• Summary of the overall position adopted – as an executive summary of the case being made;
• Consideration of housing supply by the Plan, at the overall / plan-wide area;
Summary of Overall Position

An overview / summary of the position taken and evidence put forward by these representations is provided below:

• It is considered that the Plan’s overall supply for housing underprovides as opposed to overprovides – particularly as it is considered that the LDP’s proposed strategic brownfield strategy which concentrates development on large sites will unduly restrict the deliverability of housing, and raises significant doubts that the LPA will be able to deliver sufficient housing within each Phase of the Plan.

• The plan overestimates the speed in which development can be brought forward on a number of brownfield sites, and does not allow for a range and choice of sites to come forward as and when they are required. Accordingly, it is our view that the proposed primarily brownfield strategy concentrating on large sites should be amended to include a number of appropriate greenfield sites that are able to come forward in a timely manner in response to market demands.

• An additional ‘contingency’ of housing land supply should be made to make allowances for a buoyant housing market and provide greater flexibility over the Plan period – which further makes the case for the need for additional housing allocations particularly on greenfield sites which are likely to be deliverable within the early periods of the plan.

• Residential development is in principle appropriate within Caerleon, as the settlement has been assessed as being well provided for in terms of services and facilities.

The proposed site at Newport High School Old Boys Rugby Football Club is considered to be a suitable site for residential development, particularly in view of the following factors:

○ The proposed residential development will ‘enable’ the development of a new club house, car parking and rugby pitch for Newport High School Old Boys Rugby Football Club, thereby providing a significant community / amenity benefit.

○ There are no economic constraints which will affect the development of the site within the plan period.

○ The landowner is in agreement with the proposed land use of the site.

○ Satisfactory highway access can be provided to serve the proposed site and the current highway network is capable of accommodating the proposed traffic movements.

○ The site is located within close proximity of frequent public transport services.

○ The site is accessible to local destinations on foot.

○ Caerleon provides a range of services, amenity facilities, shops and services.

○ The development of additional residential units will further sustain the existing services within Caerleon.

○ The site is not subject to any ecological designations.

○ The site’s location provides an opportunity for residential development which would be neither prominent nor isolated.

○ Existing planting / hedgerows, could be maintained and / or supplemented.

Consideration of Housing Supply by the Plan

Overall / Plan-Wide Housing Land Supply

Housing Requirement

In regards to the supply of housing land across the Authority, it is noted that the Revised Deposit Plan has increased the dwelling requirements from that provided within the Deposit Plan (April 2012). The dwelling requirement has therefore increased from 8,750 dwellings to 10,350 dwelling proposed within the Policy SP10 of the Revised Deposit Plan. This is welcomed as it is considered that the proposed figures were significantly lower than required, and would not meet the housing requirements of the area.

As outlined within the Assessment of Housing Requirements report (February 2013), prepared by Nathaniel Lichfield & Partners, it is noted that the proposed dwelling requirement has been based on an economic led scenario. This pro-growth requirement is supported as it will ensure that Newport is not significantly constrained by low housing supply and provides a more realistic picture. However, it is noted that the proposed housing figures do not take account of potential cross-boundary issues. These issues were highlighted by Edge Analytics in their report which informed the Cardiff LDP, and estimate that Newport would have population growth of 18,500 people during the Plan period. As outlined in the NLP report:
"If the assumptions that have been made by Edge Analytics are correct, this means that Newport will continue to play a role in meeting Cardiff’s economic function and that this will create an upward pressure in the housing market over and above that associated with aspirations for growth within Newport itself – i.e. as housing is required to accommodate those people that move from Cardiff to Newport take advantage of cheaper house prices (as anticipated by Edge Analytics) and to achieve alignment with employment growth." (Paragraph 3.21).

The Edge Analytics Report therefore provides for a sub-regional distribution of population growth, and the resulting Scenario D: Cardiff Adjustment provided in NLP’s report would provide for an overall dwelling requirement of 11,600 over the Plan period.

Having regard to the above, it is considered that the dwelling requirements proposed within the Revised Deposit Plan do not give enough consideration to the impact from Cardiff, and the likely population increase which will result. In order to account for this, it is therefore considered that the LDP’s dwelling requirement should be increased to 11,600 to ensure that Newport is able to accommodate the population increase and benefit from the associated economic growth.

Housing Strategy

As outlined above, Policy SP10 of the Deposit LDP indicates that over the plan period (2011-2026) sufficient land will be made available to provide for 10,350 dwellings. It is stated that the land to meet this requirement will be primarily previously developed / brownfield land. It is noted in paragraph 2.33 that the supply of housing land in the plan includes many sites that were identified in the previously adopted UDP – and because of their size, many of them have substantial parts which are not yet started.

Notwithstanding this, it is considered that there is a fundamental issue in terms of the deliverability of the housing strategy as a result of the focus on brownfield sites. Brownfield sites, as previously developed sites are likely to have greater site constraints with the potential need for site remediation works etc. Accordingly, brownfield sites can often have higher development costs and take longer to develop. Given the present economic climate there is a need for readily developable and economically viable sites to be identified.

Conversely, greenfield sites or smaller previously developed sites, which by their nature are likely to be less constrained, and therefore quicker to be brought forward for development within the early stages of the plan period, would balance out the likely delays in bringing forward development on the brownfield sites.

Despite the overprovision in plots which appears to exist it is considered that a primarily brownfield strategy will not allow the level of annual completions to be met in order to meet the housing need that has been defined.

Deliverability Issues with Primarily Brownfield Only Strategy

Table 5 within the Housing Background paper (June 2012) provides a detailed analysis of the relative number of completions between brownfield and greenfield sites in the last 5 years.

<table>
<thead>
<tr>
<th>Period</th>
<th>Total Completions</th>
<th>Total Greenfield Completions</th>
<th>Total Brownfield Completions</th>
<th>% of Brownfield</th>
<th>completions as overall housing supply</th>
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<tr>
<td>2006/7 462</td>
<td>169</td>
<td>293</td>
<td>63</td>
<td></td>
<td></td>
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<tr>
<td>2007/8 571</td>
<td>157</td>
<td>414</td>
<td>73</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2008/9 582</td>
<td>87</td>
<td>495</td>
<td>85</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2009/10 362</td>
<td>17</td>
<td>345</td>
<td>95</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2010/11 361</td>
<td>0</td>
<td>361</td>
<td>100</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2011/12 367</td>
<td>9</td>
<td>361</td>
<td>98</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2012 148</td>
<td>0</td>
<td>148</td>
<td>100</td>
<td></td>
<td></td>
</tr>
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</table>

This demonstrates that generally housing completions have been falling on an annual basis. Whilst this is in part due to economic issues, it is considered that is a result of a lack of greenfield completions contributing to the overall figure as they have been falling on an annual basis – and in 2010/11 there was not 1 completion on a greenfield site.

It is noted that the UDP provided for the phasing of the allocated housing sites over three successive five year periods – 1996 to 2001, 2001 - 2006 and 2006 to 2011 (the UDP was also based on a strategy of primarily brownfield only sites). The table below provides an overview of the completions during each period against the target UDP requirement:
It is considered that the above table demonstrates that, although completions have actually increased over each of the 5 year periods, that due to the small number of greenfield sites having been built out (as evidenced in Housing Background Paper) as a result of the strategic brownfield strategy this has resulted in the shortfall of housing completions which currently exists. This drop in completions over the last remaining years of the UDP is further evidenced by the fact that in 2009 – 2012 on average there have been less than 400 completions per annum.

It is considered that all of the allocated housing sites are highly unlikely to come forward exactly as the phasing plan provides for, and that some sites timetabled for release early in the LDP period will be delayed. In order to further demonstrate the over reliance upon brownfield sites, the following table provides an overview of the key strategic brownfield sites which were ‘allocated’ within the UDP and are now proposed to be included within the LDP – and the estimated units which will be delivered within the respective plan period.

<table>
<thead>
<tr>
<th>Period</th>
<th>Average UDP requirement</th>
<th>Total Completions</th>
<th>Residual Requirements</th>
<th>Accession No</th>
<th>Date Lodged</th>
<th>Late?</th>
<th>Source</th>
<th>Type</th>
<th>Mode</th>
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<th>Status Modified</th>
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<tr>
<td>1996 - 2001</td>
<td>1800</td>
<td>2184</td>
<td>+384</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2001 - 2006</td>
<td>2000</td>
<td>2212</td>
<td>+212</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>2006 - 2011</td>
<td>3700</td>
<td>2558</td>
<td>-1142</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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</tbody>
</table>

In addition to this it is estimated that 495 units will come forward on the Lysaghts Village (Orb Works) over the LDP plan period.

The above table demonstrates that there are a significant number of units on currently allocated brownfield sites which have not come forward over the UDP period (with the majority of these not having seen any development at all). The proposed ‘rolling forward’ of these allocations is not fundamentally contested, however should the majority of these key sites (allocated to meet the housing requirement) not come forward early within the LDP plan period the housing requirement will not be met.

In addition, as a number of the sites have seen little or no development over the UDP plan period, it is questioned whether these sites are all deliverable, and whether it is likely that all of these sites will now be able to come forward for development over the LDP Plan period. Indeed, it is noted that the vast majority of proposed LDP allocations are current allocations / commitments. As the Plan is focussed on such sites it is therefore critical that the deliverability of such sites is evidenced.

This issue is further evidence in the Joint Housing Land Availability Study (2010). This confirms that for a number of the brownfield site listed above, a significant proportion of the units fall within category 3 (sites where development is unlikely within the next 5 years due to major physical constraints).

<table>
<thead>
<tr>
<th>Site</th>
<th>Units to be completed by 2015</th>
<th>Category 3 units</th>
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</thead>
<tbody>
<tr>
<td>Glan Llyn</td>
<td>575</td>
<td>3425</td>
</tr>
<tr>
<td>Pirelli Works</td>
<td>150</td>
<td>50</td>
</tr>
<tr>
<td>Eastern Expansion Area</td>
<td>150</td>
<td>950</td>
</tr>
<tr>
<td>Cindau</td>
<td>50</td>
<td>370</td>
</tr>
<tr>
<td>Monmouthshire Bank Sidings</td>
<td>200</td>
<td>250</td>
</tr>
</tbody>
</table>

Within the most recent Joint Housing Land Availability Study (2012) the number of units to be delivered on the sites by 2015 has fallen dramatically – and this is outlined in the table below. In the case of Glan Llyn this has fallen to just 100 units from 575.
Accordingly, it is considered likely that the Authority will be “behind” in providing the required housing numbers before the end of the first phase of the LDP, and may be unable to maintain a 5 year housing land supply, as required by the Welsh Government.

In view of this, it is considered that the LDP’s proposed strategic brownfield strategy will unduly restrict the deliverability of housing, and raises significant doubts that the LPA will be able to deliver sufficient housing within each Phase of the Plan. In particular, should only one or two housing sites be delayed in coming forward within the first 5 years of the Plan then the Authority will already fall behind in providing sufficient housing to provide for assessed needs. This is considered to be particularly likely due to the Council’s reliance on / priority given to brownfield sites and existing UDP allocations / commitments. Large strategic brownfield sites, in their nature, are likely to have more remediation and infrastructure needs resulting in higher development costs and greater potential for development delays. It is therefore considered likely that a number of the brownfield sites proposed for development will not come forward during this time and / or will provide for lower numbers of units than is currently provided for. Accordingly it is considered that there is requirement to allocate a number of greenfield sites as part of the LDP in order to allow a more equitable and suitable approach in meeting the housing requirement over the plan period.

Infill Issue

It is noted that in the region of 15% of the Newport’s total dwelling supply over the plan period is comprised of potential development from windfall sites (513 units from small windfall sites less than 10 dwellings and 1013 units from large windfall sites more than 10 dwellings), which relates to approx 75 dwellings per annum. It is not considered sound that such a high percentage of the total housing supply relies on windfall sites coming forward for development, particularly in view of recent development rates on windfall sites.

In 2009/10 the total number of dwellings that came forward through small sites was 33 units, in 2010/11 40 units came forward, 2011/12 35 units and only 14 in 2012 as confirmed within the Housing Background Paper. Whilst it is noted that average levels (in the context of the LDP) of windfall development have historically been seen in Newport, it is not considered that this is a trend that is able to continue into the future. In particular, the key / most obvious windfall sites have already come forward and have been developed out over previous years, which has resulted in a smaller ‘pool’ of potential windfall sites being available. Therefore, as the levels of potential windfall sites significantly reduce, the rate of development on such sites is likely to slow dramatically, as developers find it harder to find suitable sites.

Furthermore in relation to small sites, the total number of completions in the last five years as a % of the overall number of completions has averaged at 9%. On this basis alone the windfall allowance for small sites over the plan period would need to be in the region of 750 units – more than 200 higher than accounted for within the LDP.

Accordingly, based on these more recent trends, it is not considered that the housing provision on small windfall sites will be developed at anywhere near the level indicated in the LDP. It is therefore considered that the LDP overestimates the levels of dwellings expected to come forward on windfall sites within the LDP, which is likely to result in an underprovision in the total dwelling supply. This over reliance on windfall sites will therefore restrict the ability of the LDP to provide for the housing needs of the local population. Accordingly this further establishes the need for the allocation of additional sites for residential development.

Summary

To summarise, it is our view that the Plan’s overall supply for housing underprovides as opposed to overprovides – an approach which is inconsistent with the drive to re-stimulate the housing market as
a result – due to legitimate concerns about the ability of a number of allocated brownfield sites (which are likely to have greater site constraints) to deliver the required / allocated numbers of units (particularly in the early phases of the Plan period), which further makes the case for the need for additional housing allocations - particularly on greenfield sites which are likely to be deliverable within the earlier periods of the LDP.

Assessment of the Suitability of the Settlement for Development

The site is located directly adjacent to the settlement limits of Caerleon within the currently adopted Newport Unitary Development Plan (2006). Accordingly it occupies a position which is within close proximity to the existing settlement. Caerleon is a defined district centre within the Revised LDP.

Caerleon has a wide range of services and facilities, including the following:
- A range of shops
- Community Centre
- Church
- Primary and Secondary Schools
- Public House's, Restaurants and Cafes
- Bus stops

In particular, the following services and facilities are located on Mill Street / Station Road (circa. 300 metres to the south west of the site):
- Estate agents
- Hairdressers
- Takeaways and sandwich bars
- Sweet shop
- Convenience Store
- Opticians
- Newsagents
- Public houses

In addition, the following services and facilities are located on High Street (circa. 800 metres to the south of the site):
- Pharmacy
- Charity shop
- Medical centre
- Church
- Bakeries
- Museum
- Novelty shop
- Hardware stores
- Public Houses
- Boutique shop
- Post office
- Restaurants and Takeaway
- Florist

In light of the above, it is evident that the site is located in a sustainable located for a wide range of local services. Accordingly, it is considered that the settlement is well provided for in terms of services and facilities – at least in so far as providing and meeting 'day to day' needs and services relied upon by residents. It is therefore clear that additional residential development would, in principle, be appropriate within the settlement of Caerleon.

It is considered that, in addition to being suitable for residential growth, additional housing development would assist in ensuring the continued viability of the existing shops and services within the locality, whilst also ensuring that a range of housing is available to provide for the housing needs of the local population.
Assessment of the Suitability of Site for Development

In assessing the suitability of the site for development a number of key issues need to be considered in detail. These are as follows:

- **Overview of Key Considerations Relating to the Site**
- **Overview of the Proposed Development**

**Overview of Key Considerations Relating to the Site**

The proposed site is located directly adjacent to the settlement of Caerleon. In terms of the key characteristics of the site the following points are of relevance:

- The site encompasses an existing rugby pitch, the associated club house and parking areas
- The site is bound (and enclosed) by the following physical / 'defensible' boundaries:
  - North: existing mature boundary hedgerows
  - East: existing additional rugby pitches associated with the club
  - South: existing residential dwellings
  - West: existing built form and the railway line
- Access to the site for vehicles is currently provided directly to the south of the site, from an access road which runs from Usk Road

It is considered that the site is relatively well-placed in terms of its credentials for allocation with LDP for residential development, as detailed below:

- The site is located directly adjacent to Caerleon's residential boundary.
- The site is located within close proximity to Caerleon's district centre and the wide range of shops and facilities available within the settlement.
- There are a number of bus stops and services assessable from the application site. The bus stop on High Street, located 480m to the south of the site, provides direct and regular services to Newport City Centre.
- The site is located in a relatively accessible location – being in close proximity to Junctions 24 and 25 of the M4.
- Policy T1 of the Revised Deposit LDP proposes the provision of a new railway station at Caerleon – which will further improve the accessibility and sustainability characteristics of the settlement.
- The site is closely related to the existing settlement of Caerleon. In light of the site's location on the boundary of the settlement limit, and its enclosure by existing development / railway line / mature landscaping on all boundaries, the development of the site would form a logical parcel of development adjoining Caerleon (and could be considered and presented as appropriate ‘rounding-off’ the existing settlement).
- The site is bound on all sides by existing development and mature landscaping – it is therefore enclosed by 'defensible' boundaries to all aspects and cannot be considered to be 'open countryside'.
- The site is not subject to any significant site constraints and would provide a viable, and deliverable residential development site.

**Overview of the Proposed Development**

The proposed development scheme seeks to provide a high quality residential development on a portion of the proposed site, in combination with the provision of a new club house and pitch for the Newport High School Old Boys Rugby Football Club. The total site area is approximately 7.18 hectares.

The accompanying indicative site concept plan provides an indication of the proposed locations for each part of the proposed development.

To the west of the existing site access point (highlighted pink on the concept plan), and where the existing informal parking area is currently provided, a new rugby club house and formal parking area is proposed to be provided for Newport High School Old Boys RFC – this relates to an area of approximately 0.6ha. The development of the club house and parking area will be ‘enabled’ by the residential development on the adjacent land, and will therefore represent a significant benefit in terms of the facilities provided by the club, for use by the local community.

As outlined on the concept plan, the area of land (highlighted orange) located to the west of the existing site access (which is currently in use as an rugby pitch and club house for Newport High School Old Boys RFC) is proposed for the residential development – this relates to a site area of approximately 1.6ha. This will seek to provide a high quality scheme which would look to respond in both form and layout to the existing residential developments located to the south of the site. Landscaping would be provided within and surrounding the site in order to minimise any potential visual impacts on the surrounding landscape.

The existing rugby pitches located to the east of the site (highlighted yellow on the concept plan) will be retained in use as existing. In addition, a new rugby pitch is proposed to be provided on land to the north of the site (highlighted blue on the concept plan), which will further enhance the club’s facilities. Again, these new facilities will be ‘enabled’ through the proposed residential development. Vehicular access to the site is proposed to be provided directly from the existing access road which provides access from Usk Road to the site’s southern boundary.

As outlined above, the proposed development seeks to provide a new rugby club house and parking area, along with a new pitch for Newport High School Old Boys RFC, which will provide a significant community and amenity benefit.
This development will be enabled by the development of a high quality residential scheme on a small portion of the site. The residential development will also assist in ensuring that the Authority is able to provide for a wide variety of housing choice and styles across the area, in order to ensure that the housing needs of the whole population are provided for. The proposed development is considered to provide an appropriate form and nature of development, which will assist in providing residential development in a sustainable and accessible location, and will enable the provision of new facilities for the rugby club, which will have a significant positive community and amenity impact, for the use by the local community.

Summary of the Suitability of Site for Development

As outlined above the proposed site at Newport High School Old Boys Rugby Football Club represents a site which is considered to be suitable for a residential development, which will enable the development of a new rugby club house, pitch and parking area. In summary therefore, the site is considered to be suitable to provide for the proposed development for the following reasons:

Economic Viability
- There are no economic constraints which will affect the development of the site within the plan period.
- The site is able to served to by existing utilities infrastructure.
- The proposal will 'enable' the development of a new club house and pitch for Newport High School Old Boys Rugby Football Club, which will provide a significant community benefit which would likely not otherwise be able to be funded.

Highways
- Satisfactory highway access can be provided to serve the proposed site and the current highway network is capable of accommodating the proposed traffic movements.
- Local destinations can be safely accessed from the site via the local highway network.
- The site has good access to the wider highway network and strategic highway routes.

Sustainability
- The site is located within close proximity of bus stops.
- The site is accessible to local destinations on foot.
- Caerleon provide for a range of services / facilities.
- The development of additional residential units will further sustain the existing services within the settlements.

Environmental Health / Amenity
- The development of the site will not create a potential nuisance in terms of air, light, noise or waste.

Biodiversity / Landscape
- It is considered that the development proposal will not have any negative impact on the surrounding countryside.
- Any potential landscape impacts can be effectively managed through sensitive design of the proposals and appropriate landscaping. Accordingly, it is not considered that the proposals will cause any significant harm.

Requested / Recommended Changes to the Plan

In light of, and as a consequence of these representations, the particular parts / policies of the Plan subject to these representations, and which are considered to need amendment are:

- Policy SP5 Countryside – Removal of the site from the countryside designation.
- Policy SP10 Residential Requirement – Increase in the overall housing numbers (to reflect deliverability issues with brownfield sites) and allocation of appropriate greenfield sites to ensure that the needs of the Authority are provided for, and also to provide a higher ‘contingency’ for flexibility over the Plan period.
- Policy H1 Housing Supply – Increase in the overall housing numbers, including an increase in the contingency provision, and allocation of the proposed alternative site for residential development.
- Policy CE4 Environmental Spaces and Corridors – Removal of part of the site from the designation of an environmental space, and placement of this designation on adjoining land.

In addition, the Proposals Map of the LDP needs to be amended to include:
- The Alternative Site as a housing allocation (and within settlement limits)
- Removal of the site from the countryside designation
- Amendment of the environmental spaces designation

It is respectfully urged that the Plan is amended accordingly to ensure its ‘soundness’.

12/02/2014

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<th>Tick-box reply</th>
</tr>
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<td>2 Soundness of LDP</td>
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### Representation Details

*by: (No grouping)*
*Filtered to show: (all of) Stage=L; Status=M*

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*Item Question Council Responses*
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Following representations at the Deposit LDP stage the housing requirement figure has been justified and increased from the proposed Welsh Government Population projections. There is scope for an authority to deviate from the WG population projections but this deviation is required to be well evidenced. The NLP assessment sets out this evidence base and illustrates that Newport, as one of the few areas in Wales with an anticipated population increase noted in the Census, is set to grow and reflects the Council’s policy aspiration for growth. It should be recognised that the majority of the sites (46 of 55) have planning permission or permission subject to a Section 106 agreement. This established supply with clear market intent illustrates not only that a growth strategy is appropriate but achievable.

As noted above, the Plan identifies its housing requirement for the plan period based on an assessment of need and this is also true of its employment land requirements. The clear strategy for the Plan is for growth and it will be through the successful implementation of the policies of the Plan that this will be achieved. There is a clear link between housing supply and economic growth which is why the supply will be monitored annually.

Reliance on previous Development Plan sites

The Local Development Plan does have a number of housing sites which were identified within the Unitary Development Plan. In total there are 15 of the 55 housing sites which continue into the new plan. The majority of these sites have progressed significantly from the UDP, as noted below:

1. Land adj. McReadys. As of 1st April 2013 the developer is on site preparing the site for development.
2. Eastern Expansion Area. Planning permission has been granted with a signed Section 106 agreement. Gallagher Estates have confirmed through the JHLAS process that they will be delivering units on site in 2015.
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14. Whitehead Works. This site is part of a Welsh Government regeneration scheme, which anticipates delivery to begin in 2016.
15. Bideford Road. This site is compliant with the overall strategy of the LDP being a brownfield urban site with potential for regeneration. There is no application on the site but the area is the remaining part of a housing estate development.

The information above clearly shows that although there are a number of sites which have continued from one development plan to the other they have in the main progressed significantly or that they will be delivered within the plan period. It is also important to note that it was made clear through the UDP process that the growth proposed in the east of the city (i.e. Glan Llyn and Llanwern Village) was not anticipated to be delivered wholly within the UDP plan period.

Deliverability and Supply

The Plan identifies its housing and employment land supply for the plan period which is based on an assessment of need. The clear strategy for the Plan is for growth and it will be through the successful implementation of the policies of the Plan that this will be achieved. There is a clear link between housing supply and economic growth which is why the supply will be monitored annually.

The Plan does however provide enough land to ensure that a 5 year supply is met and, that although the annual build rate is higher than currently achieved, even when taking into account the residual method of calculation the Council has provided an adequate supply of land which has been agreed with the industry through the JHLAS process.
Planning Policy Wales sets out the overarching requirement for development to be placed on brownfield sites in preference to greenfield sites. The plan allocates 82% housing units on brownfield sites with the remaining 18% of units on greenfield sites (these calculations excludes the completions, windfall and small sites supply figures). The LDP is therefore compliant with Planning Policy Wales in terms that it has followed the search sequence criteria starting with the re-use of previously developed land and buildings within settlements which are located in areas accessible to jobs and services, where there is existing infrastructure and the scope to build sustainable communities.

The representation raises a concern that one of the reasons for a drop in housing delivery over the past few years is due to the lack of greenfield sites. This is not an accurate picture of the reality of housing supply in Newport. Brownfield sites are being delivered in the same economic environment as those greenfield sites with planning permission which do not have the same level of abnormal costs to consider.

As illustrated above the perception that the Plan is overly reliant on sites inherited from the UDP period is not well founded. In addition a number of the sites outlined by the developer as being undeliverable are in fact progressing e.g. Alcan. Not all the sites noted are counted as part of the housing supply due to the lack of evidence of deliverability e.g. Newport Athletic Club. The Council has been realistic in its approach to the housing supply set out in the Plan which is based on the annual JHLAS process to ensure that the sites can be delivered to ensure the strategy is met.

The rate of windfall sites is also questioned and as noted in Planning Policy Wales there is a need to consider the supply from such sites. The LDP based its figures on a review of the past trend of windfall supply which has been drastically cut to reflect the need for the Plan to remain flexible whilst concentrating growth on allocated housing sites and tight settlement boundaries. The plan will be monitored as to the percentage of houses developed on allocated housing sites to ensure that the housing policies of the plan are being effectively implemented.

Range and Choice
The supply of housing is considered to provide for a clear range and choice of housing which is a clear concern for many representors. The housing sites within the Plan are located across the City, with a clear focus on regeneration in the east as per the established strategy. The Plan provides a supply of affordable units for a mixture of needs as well as providing a mix of family homes and inner city living to cater for the broad housing market. The opportunity to provide homes in more rural locations has been investigated and there was no clear evidence to justify expansion to existing settlements. The Plan therefore has provided the opportunity for exception sites where such justification can be produced.

Flexibility
As the representation notes there is no set flexibility figure required for housing supply within development plans. However, during the examination of the Brecon Beacons National Park LDP WG noted a notional figure of 10% but that needed to reflect local circumstances. Other authorities within South East Wales have a range of 12-20% flexibility. It is good practice to allow for unknowns and the need for flexibility within a development plan is inherent from National Planning Policy. In Newport’s case the majority of the housing supply has planning permission or is being progressed. Those remaining 9 sites without planning permission are in line with the overall strategy or regeneration needs of the plan. Together they provide a 12% oversupply which is considered appropriate to enable plan to cope with uncertainties that may arise over the plan period.

Strategy compliance and delivery.
It is considered that the plan provides a more than adequate supply of housing, both market and affordable, which is both deliverable and viable. Many of the sites have progressed since the Revised Deposit Plan was written and there is a steady supply of housing being achieved across Newport. The Plan identifies its housing and employment land supply for the plan period based on an assessment of need. The clear strategy for the Plan is for growth and it will be through the successful implementation of the policies of the Plan that this will be achieved. There is a clear link between housing supply and economic growth which is why the supply will be monitored annually.

The work undertaken by NLP did consider the influence from Cardiff but the final recommended scenario did not take into account the potential cross-boundary issues with Cardiff that were highlighted by Edge Analytics as it does not take account of the recalibration that resulted in a substantial adjustment to the population projections for Newport. The reason for this is that it has not been possible to verify the analysis that informed the figures presented by Edge Analytics. This again points towards an upward pressure in the local housing requirements for Newport compared to the 2008 Welsh Government projections.

The plan seeks to promote the reuse of Brownfield sites in preference to extensive use of Greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities.

The forecast housing need has been assessed in the context of population and employment projections and current market realities. The plan allocates sufficient land to meet this requirement. Additional housing allocations in a rural location cannot therefore be justified.
It is recommended that this site at Newport High School Old Boys is not included in the Local Development Plan for development.

Notwithstanding the above, this site is located within Flood Zone C2, so housing development would be contrary to national planning policy and TAN 15.
**Rep'n/Para/Policy** | **Representor** | **Agent** | **Accession No** | **Date Lodged** | **Late** | **Status** | **Source** | **Type** | **Mode** | **Status Modified**
---|---|---|---|---|---|---|---|---|---|---
3985.L3/SP05 | Redrow Homes Ltd | Geraint John Planning | | 06/08/2013 | | | | | | |

**Document:** Revised LDP, p.21

**Policy:** SP05

**Summary:** Seeks the removal of Newport High School Old Boys RFC from the countryside designation

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**Soundness Test**

**C2, CE1, CE2, CE3, CE4**

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**Representation**

Seeks the removal of the site at Newport High School Old Boys Rugby Football Club from the countryside designation.

Please refer to the accompanying cover letter and Annex for further details

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**Speaking at Public Examination**

Yes

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**Soundness of LDP**

No

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**Council Response**

No change. The site is within a proposed Countryside allocation.

The plan seeks to promote the reuse of brownfield sites in preference to extensive use of greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities. The forecast housing need has been assessed in the context of population and employment projections and current market realities. The plan allocates sufficient land to meet this requirement. Additional housing allocations in a rural location cannot therefore be justified. Furthermore, the release of the representation site for housing would be contrary to the Council’s strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

A background paper ‘Delivery and Implementation’ has been produced to expand on the information supplied in Chapter 13 of the Deposit LDP. This sets out the proposed phasing, constraints and infrastructure requirements for each allocation. The Delivery of each site is considered here, setting out the justification for its continuation in the plan based on evidence from developers and landowners. Some of the large brownfield sites allocated within the previous Unitary Development Plan have started construction e.g. Glan Llyn with 4000 homes and employment uses on the site. The impact on development by the economic recession is to be considered and the plan takes a long term view across the entire plan period.

The LDP sets out a strategy for growth which allocates an adequate supply of land for residential and employment uses. The supply of this land is not concentrated in one area but across the City. It is recognised that growth in the east is significant but the west has not been overlooked with large brownfield sites allocated at Novelis, former Whitehead Works and Monmouthshire Bank Sidings. The review of village boundaries has clearly considered the need for expansion in these areas and following their assessment boundaries have been tightened and allocations resisted due to the unsuitability of sites proposed in these unsustainable locations.

Notwithstanding the representation submitted in support of this site, the Council maintains the position that the LDP is sound and relies on the evidence which supports it. In this respect, the Council does not support this site. The countryside allocation should therefore remain.
### Representation Details

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### Item Question | Representation Text

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<td>Seeks to increase the overall housing numbers. Please refer to the accompanying cover letter and Annex for further details</td>
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| Speaking at Public Examination | Yes |

### Item Question | Tick-box reply

| Soundness of LDP | No |

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### Council Responses

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The forecast housing need has been assessed in the context of population and employment projections and current market realities. The plan allocates sufficient land to meet this requirement. Additional housing allocations in a rural location cannot therefore be justified.
It is recommended that the proposed site is not included in the Local Development Plan for development.
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<td>Geraint John Planning</td>
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<td>06/08/2013</td>
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**Document:** Revised LDP, p.65

**Policy:** H01

**Summary:** Seeks an increase in housing numbers and allocation of new development site at Christchurch

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Newport City Council Revised Local Development Plan: Deposit (June 2013)
Alternative Site Submission / Objection to the Plan
Land at Christchurch, Newport

Please find enclosed, on behalf of and under instruction from Redrow Homes Ltd, representations to the Deposit LDP.

This submission:
- puts forward an Alternative Site Representations; and
- objects to selected policy provisions of the plan.

For the Alternative Site Representation, the following information is (as required) enclosed:
- completed, signed and dated Deposit Plan Response Forms;
- a Sustainability Appraisal;
- Red line plan.

Furthermore, and as an Annex to this letter, a detailed case (providing a critique of the current provisions of the plan and suggested changes to its content) is included, in support of, and to make the case for the inclusion of the Alternative Sites; and suggested changes to the provisions of the Plan’s policies.

The Annex addresses the following issues, and is structured accordingly:
- Summary of the overall position adopted – as an executive summary of the case being made;
- Consideration of housing supply by the Plan, at the overall / plan-wide area;
- An Assessment of the Suitability of the Settlement for Development;
- An Assessment of the Suitability of Site for Development;
- A Summary of the Suitability of Sites for Development;
- Requested / recommended changes to the Plan.

Given the detailed nature of these representations our client would be happy to discuss any aspect of the submission made and credentials of the site when your Authority (and the appointed Inspector in turn) comes to evaluate matters. Appearance at the Public Examination in due course is also considered necessary and beneficial.

We respectfully urge, for the reasons given herein and in the associated submitted information / supporting material, to allocate the sites put forward.

Enc’s:
- Completed Deposit LDP Response Form
- Representation Regarding Policy SP5 Countryside
- Representation Regarding Policy SP10 Residential Requirement
- Representation Regarding Policy H1 Housing Supply
- Site Location Plan
- Sustainability Appraisal
- Sketch Layout Plan
- Landscape Appraisal
## Representation Details

### Preface

This Annex sets out the detailed case in support of these representations.

It provides both a critique of the current provisions of the plan, and suggested changes to its content.

The representations are structured as follows:

- Summary of the overall position adopted – as an executive summary of the case being made;
- Consideration of housing supply by the Plan, at the overall / plan-wide area;
- An Assessment of the Suitability of the Settlement for Development;
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- A Summary of the Suitability of Site for Development;
- Requested / recommended changes to the Plan.

### Summary of Overall Position

An overview / summary of the position taken and evidence put forward by these representations is provided below:

- It is considered that the Plan’s overall supply for housing underprovides as opposed to overprovides – particularly as it is considered that the LDP’s proposed strategic brownfield strategy which concentrates development on large sites will unduly restrict the deliverability of housing, and raises significant doubts that the LPA will be able to deliver sufficient housing within each Phase of the Plan.
- The plan overestimates the speed in which development can be brought forward on a number of brownfield sites, and does not allow for a range and choice of sites to come forward as and when they are required. Accordingly, it is our view that the proposed primarily brownfield strategy concentrating on large sites should be amended to include a number of appropriate greenfield sites that are able to come forward in a timely manner in response to market demands.
- An additional ‘contingency’ of housing land supply should be made to make allowances for a buoyant housing market and provide greater flexibility over the Plan period – which further makes the case for the need for additional housing allocations particularly on greenfield sites which are likely to be deliverable within the early periods of the plan.
- Residential development is in principle appropriate within Christchurch, as the settlement has been assessed as being well provided for in terms of services and facilities.
- The proposed site at Christchurch is considered to be a suitable site for residential development, particularly in view of the following factors:
  - There are no economic constraints which will affect the development of the site within the plan period.
  - Satisfactory highway access can be provided to serve the proposed site and the current highway network is capable of accommodating the proposed traffic movements.
  - The site is located within close proximity of frequent public transport services.
  - The site is accessible to local destinations on foot.
  - The development of additional residential units will further sustain the existing services within Christchurch, as well as the adjacent Caerleon.
  - The site is not subject to any ecological designations.
  - The site’s location provides an opportunity for residential development which would be neither prominent nor isolated.
  - Existing mature planting / hedgerows, could be maintained and / or supplemented.
  - The site is at no risk of flooding.

### Consideration of Housing Supply by the Plan

#### Overall / Plan-Wide Housing Land Supply

#### Housing Requirement

In regards to the supply of housing land across the Authority, it is noted that the Revised Deposit Plan has increased the dwelling requirements from that provided within the Deposit Plan (April 2012). The dwelling requirement has therefore increased from 8,750 dwellings to 10,350 dwelling proposed within the Policy SP10 of the Revised Deposit Plan. This is welcomed as it is considered that the proposed figures were significantly lower than required, and would not meet the housing requirements of the area.
As outlined within the Assessment of Housing Requirements report (February 2013), prepared by Nathaniel Lichfield & Partners, it is noted that the proposed dwelling requirement has been based on an economic led scenario. This pro-growth requirement is supported as it will ensure that Newport is not significantly constrained by low housing supply and provides a more realistic picture.

However, it is noted that the proposed housing figures do not take account of potential cross-boundary issues. These issues were highlighted by Edge Analytics in their report which informed the Cardiff LDP, and estimate that Newport would have population growth of 18,500 people during the Plan period. As outlined in the NLP report:

“If the assumptions that have been made by Edge Analytics are correct, this means that Newport will continue to play a role in meeting Cardiff’s economic function and that this will create an upward pressure in the housing market over and above that associated with aspirations for growth within Newport itself – i.e. as housing is required to accommodate those people that move from Cardiff to Newport take advantage of cheaper house prices (as anticipated by Edge Analytics) and to achieve alignment with employment growth.” (Paragraph 3.21).

The Edge Analytics Report therefore provides for a sub-regional distribution of population growth, and the resulting Scenario D: Cardiff Adjustment provided in NLP’s report would provide for an overall dwelling requirement of 11,600 over the Plan period.

Having regard to the above, it is considered that the dwelling requirements proposed within the Revised Deposit Plan do not give enough consideration to the impact from Cardiff, and the likely population increase which will result. In order to account for this, it is therefore considered that the LDP’s dwelling requirement should be increased to 11,600 to ensure that Newport is able to accommodate the population increase and benefit from the associated economic growth.

Housing Strategy

As outlined above, Policy SP10 of the Deposit LDP indicates that over the plan period (2011-2026) sufficient land will be made available to provide for 10,350 dwellings. It is stated that the land to meet this requirement will be primarily previously developed/brownfield land. It is noted in paragraph 2.33 that the supply of housing land in the plan includes many sites that were identified in the previously adopted UDP – and because of their size, many of them have substantial parts which are not yet started.

Within Section 5 – Housing, it is noted that in terms of existing commitments, including sites subject to S106 agreements and site under construction, there appears to be a potential over provision in the number of plots to meet the identified dwelling requirement over the plan period.

Notwithstanding this, it is considered that there is a fundamental issue in terms of the deliverability of the housing strategy as a result of the focus on brownfield sites. Brownfield sites, as previously developed sites are likely to have greater site constraints with the potential need for site remediation works etc. Accordingly, brownfield sites can often have higher development costs and take longer to develop. Given the present economic climate there is a need for readily developable and economically viable sites to be identified.

Conversely, greenfield sites or smaller previously developed sites, which by their nature are likely to be less constrained, and therefore quicker to be brought forward for development within the early stages of the plan period, would balance out the likely delays in bringing forward development on the brownfield sites.

Despite the overprovision in plots which appears to exist it is considered that a primarily brownfield strategy will not allow the level of annual completions to be met in order to meet the housing need that has been defined.

Deliverability Issues with Primarily Brownfield Only Strategy

Table 5 within the Housing Background paper (June 2012) provides a detailed analysis of the relative number of completions between brownfield and greenfield sites in the last 5 years.

<table>
<thead>
<tr>
<th>Period</th>
<th>Total Completions</th>
<th>Total Greenfield Completions</th>
<th>Total Brownfield Completions</th>
<th>% of Brownfield completions as overall housing supply</th>
</tr>
</thead>
<tbody>
<tr>
<td>2006/7</td>
<td>462</td>
<td>169</td>
<td>293</td>
<td>63</td>
</tr>
<tr>
<td>2007/8</td>
<td>571</td>
<td>157</td>
<td>414</td>
<td>73</td>
</tr>
<tr>
<td>2008/9</td>
<td>582</td>
<td>87</td>
<td>495</td>
<td>85</td>
</tr>
<tr>
<td>2009/10</td>
<td>362</td>
<td>17</td>
<td>345</td>
<td>95</td>
</tr>
<tr>
<td>2010/11</td>
<td>361</td>
<td>0</td>
<td>361</td>
<td>100</td>
</tr>
<tr>
<td>2011/12</td>
<td>367</td>
<td>9</td>
<td>361</td>
<td>98</td>
</tr>
<tr>
<td>2012</td>
<td>148</td>
<td>0</td>
<td>148</td>
<td>100</td>
</tr>
</tbody>
</table>

This demonstrates that generally housing completions have been falling on an annual basis. Whilst this is in part due to economic issues, it is considered that is a result of a lack of greenfield
completions contributing to the overall figure as they have been falling on an annual basis – and in 2010/11 there was not 1 completion on a greenfield site.

It is noted that the UDP provided for the phasing of the allocated housing sites over three successive five year periods – 1996 to 2001, 2001 - 2006 and 2006 to 2011 (the UDP was also based on a strategy of primarily brownfield only sites). The table below provides an overview of the completions during each period against the target UDP requirement:

<table>
<thead>
<tr>
<th>Period</th>
<th>Average UDP requirement</th>
<th>Total Completions</th>
<th>Residual Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>1996 - 2001</td>
<td>1800</td>
<td>2184</td>
<td>+384</td>
</tr>
<tr>
<td>2001 - 2006</td>
<td>2000</td>
<td>2212</td>
<td>+212</td>
</tr>
<tr>
<td>2006 - 2011</td>
<td>3700</td>
<td>2558</td>
<td>-1142</td>
</tr>
</tbody>
</table>

It is considered that the above table demonstrates that, although completions have actually increased over each of the 5 year periods, that due to the small number of greenfield sites having been built out (as evidenced in Housing Background Paper) as a result of the strategic brownfield strategy this has resulted in the shortfall of housing completions which currently exists. This drop in completions over the last remaining years of the UDP is further evidenced by the fact that in 2009 – 2012 on average there have been less than 400 completions per annum.

It is considered that all of the allocated housing sites are highly unlikely to come forward exactly as the phasing plan provides for, and that some sites timetabled for release early in the LDP period will be delayed.

In order to further demonstrate the over reliance upon brownfield sites, the following table provides an overview of the key strategic brownfield sites which were ‘allocated’ within the UDP and are now proposed to be included within the LDP – and the estimated units which will be delivered within the respective plan period.

<table>
<thead>
<tr>
<th>UDP allocation</th>
<th>Units to be completed by 2015</th>
<th>LDP allocation</th>
<th>Category 3 units</th>
</tr>
</thead>
<tbody>
<tr>
<td>H1(5) Glebelands</td>
<td>153</td>
<td>HS Glebelands</td>
<td>153</td>
</tr>
<tr>
<td>H1(4) Adj Bus Depot &amp; Newport Athletic Club</td>
<td>160</td>
<td>H18 Newport Athletic Club</td>
<td>472</td>
</tr>
<tr>
<td>H1(14) &amp; H1(145 Crindau</td>
<td>420</td>
<td>H55 Crindau</td>
<td>420</td>
</tr>
<tr>
<td>H1(54) Eastern Expansion Area</td>
<td>1100</td>
<td>H3 Eastern Expansion Area</td>
<td>1100</td>
</tr>
<tr>
<td>H1(44) Monmouthshire Bank Sidings</td>
<td>450</td>
<td>H14 Monmouthshire Bank Sidings</td>
<td>545</td>
</tr>
<tr>
<td>H1(50) Whitehead Works</td>
<td>400</td>
<td>H51 Whitehead Works</td>
<td>400</td>
</tr>
<tr>
<td>H1(51) Pirelli Works</td>
<td>150</td>
<td>H4 Pirelli</td>
<td>200</td>
</tr>
<tr>
<td>H1(53) Llanwern</td>
<td>600</td>
<td>H47 Glan Llyn</td>
<td>2997</td>
</tr>
</tbody>
</table>

In addition to this it is estimated that 495 units will come forward on the Lysaghts Village (Orb Works) over the LDP plan period.

The above table demonstrates that there are a significant number of units on currently allocated brownfield sites which have not come forward over the UDP period (with the majority of these not having seen any development at all). The proposed ‘rolling forward’ of these allocations is not fundamentally contested, however should the majority of these key sites (allocated to meet the housing requirement) not come forward early within the LDP plan period the housing requirement will not be met.

In addition, as a number of the sites have seen little or no development over the UDP plan period, it is questioned whether these sites are all deliverable, and whether it is likely that all of these sites will now be able to come forward for development over the LDP Plan period. Indeed, it is noted that the vast majority of proposed LDP allocations are current allocations / commitments. As the Plan is focussed on such sites it is therefore critical that the deliverability of such sites is evidenced.

This issue is further evidence in the Joint Housing Land Availability Study (2010). This confirms that for a number of the brownfield site listed above, a significant proportion of the units fall within category 3 (sites where development is unlikely within the next 5 years due to major physical constraints).
Within the most recent Joint Housing Land Availability Study (2012) the number of units to be delivered on the sites by 2015 has fallen dramatically – and this is outlined in the table below. In the case of Glan Llyn this has fallen to just 100 units from 575.

<table>
<thead>
<tr>
<th>Site</th>
<th>Units to be completed by 2015</th>
<th>Category 3 units</th>
</tr>
</thead>
<tbody>
<tr>
<td>Glan Llyn</td>
<td>100</td>
<td>3173</td>
</tr>
<tr>
<td>Pirelli Works</td>
<td>50</td>
<td>50</td>
</tr>
<tr>
<td>Eastern Expansion Area</td>
<td>50</td>
<td>950</td>
</tr>
<tr>
<td>Cindau</td>
<td>0</td>
<td>420</td>
</tr>
<tr>
<td>Monmouthshire Bank Sidings</td>
<td>80</td>
<td>415</td>
</tr>
</tbody>
</table>

Of the sites that have been listed it is also questionable whether the number of units specified to be delivered by 2015 will come forward.

This is further confirmed by the 2012 JHLAS, which states that 8083 units are within category 3(i) and a further 613 are within category 3(ii). A total of 8696 units are therefore constrained, and therefore will not come forward for development within the next 5 years – which relates to 74% of the total proposed homes (of 11761 units). This therefore confirms that the majority of these sites are subject to major constraints, which will likely significantly delay the development of sites over the LDP period.

Accordingly, it is considered likely that the Authority will be “behind” in providing the required housing numbers before the end of the first phase of the LDP, and may be unable to maintain a 5 year housing land supply, as required by the Welsh Government.

In view of this, it is considered that the LDP’s proposed strategic brownfield strategy will unduly restrict the deliverability of housing, and raises significant doubts that the LPA will be able to deliver sufficient housing within each Phase of the Plan. In particular, should only one or two housing sites be delayed in coming forward within the first 5 years periods of the Plan then the Authority will already fall behind in providing sufficient housing to provide for assessed needs.

This is considered to be particularly likely due to the Council’s reliance on / priority given to brownfield sites and existing UDP allocations / commitments. Large strategic brownfield sites, in their nature, are likely to have more remediation and infrastructure needs resulting in higher development costs and greater potential for development delays. It is therefore considered likely that a number of the brownfield sites proposed for development will not come forward during this time and / or will provide for lower numbers of units than is currently provided for. Accordingly it is considered that there is requirement to allocate a number of greenfield sites as part of the LDP in order to allow a more equitable and suitable approach in meeting the housing requirement over the plan period.

Infill Issue
It is noted that in the region of 15% of the Newport’s total dwelling supply over the plan period is comprised of potential development from windfall sites (513 units from small windfall sites less than 10 dwellings and 1013 units from large windfall sites more than 10 dwellings), which relates to approx 75 dwellings per annum. It is not considered sound that such a high percentage of the total housing supply relies on windfall sites coming forward for development, particularly in view of recent development rates on windfall sites

In 2008/10 the total number of dwellings that came forward through small sites was 33 units, in 2010/11 40 units came forward, 2011/12 35 units and only 14 in 2012 - as confirmed within the Housing Background Paper. Whilst it is noted that average levels (in the context of the LDP) of windfall development have historically been seen in Newport, it is not considered that this is a trend that is able to continue into the future. In particular, the key / most obvious windfall sites have already come forward and have been developed out over previous years, which has resulted in a smaller ‘pool’ of potential windfall sites being available. Therefore, as the levels of potential windfall sites significantly reduce, the rate of development on such sites is likely to slow dramatically, as developers find it harder to find suitable sites.

Furthermore in relation to small sites, the total number of completions in the last five years as a % of the overall number of completions has averaged at 9%. On this basis alone the windfall allowance for small sites over the plan period would need to be in the region of 750 units – more than 200 higher than accounted for within the LDP.

Accordingly, based on these more recent trends, it is not considered that the housing provision on small windfall sites will be developed at anywhere near the level indicated in the LDP. It is therefore considered that the LDP overestimates the levels of dwellings expected to come forward on windfall sites within the LDP, which is likely to result in an underprovision in the total dwelling supply. This over reliance on windfall sites will therefore restrict the ability of the LDP to provide for the housing needs of the local population. Accordingly this further establishes the need for the allocation of additional sites for residential development.

Summary
To summarise, it is our view that the Plan’s overall supply for housing underprovides as opposed to overprovides – an approach which is inconsistent with the drive to re-stimulate the housing market as a result – due to legitimate concerns about the ability of a number of allocated brownfield sites (which are likely to have greater site constraints) to deliver the required / allocated numbers of units (particularly in the early phases of the Plan period), which further makes the case for the need for additional housing allocations - particularly on greenfield sites which are likely to be deliverable within
the earlier periods of the LDP.

Assessment of the Suitability of the Settlement for Development

The site is located directly adjacent to the settlement limits of Christchurch within the currently adopted Newport Unitary Development Plan (2006). Accordingly it occupies a position which is within close proximity to the existing settlement. Within the Revised Deposit LDP Christchurch is identified as one of the 15 villages within the Authority.

Christchurch has the following services and facilities:
- Village Hall
- Church
- Bus stop with frequent (half hourly) services
- Shop located on Chepstow Road

In addition, the site is located within close proximity to both Caerleon, situated circa 0.8 miles to the north-west of the site where a wide variety of shops and services are available, and the convenience shop, public house and other services located on Chepstow Road, circa 0.5 miles to the south-east of the site.

Accordingly, it is considered that the settlement and surrounding area is well provided for in terms of services and facilities – at least in so far as providing and meeting ‘day to day’ needs and services relied upon by residents. It is therefore clear that additional residential development would, in principle, be appropriate within the settlement of Christchurch.

It is considered that, in addition to being suitable for residential growth, additional housing development would assist in ensuring the continued viability of the existing shops and services within the locality, whilst also ensuring that a range of housing is available to provide for the housing needs of the local population.

Assessment of the Suitability of Site for Development

In assessing the suitability of the site for development a number of key issues need to be considered in detail. These are as follows:
- Overview of Key Considerations relating to the site
- Overview of the Proposed Development
- Landscape Appraisal
- Highways Assessment

Overview of Key considerations relating to the site

The proposed site is located adjacent to the settlement of Christchurch. In terms of the key characteristics of the site the following points are of relevance:
- The site encompasses an area of agricultural land currently under pasture
- The site is bound (and enclosed) by the following physical / ‘defensible’ boundaries:
  - North - East: existing post and wire fencing and frequent trees and shrubs
  - North - West: mature woodland belt
  - East: boundary of dense hedgerows and adjacent Catsash Road
  - South: existing residential dwellings
  - West: existing mature hedgerow and woodland and adjacent Old Hill Lane

It is considered that the site is relatively well-placed in terms of its credentials for allocation with LDP for residential development, as detailed below:
- The site is located directly adjacent to Christchurch’s residential boundary.
- The site is located within close proximity to the existing settlement of Caerleon.
- The site is located within 280m of the nearest bus stop at Christchurch cenotaph, which provides regular services to Newport.

The site is located in a relatively accessible location – being in close proximity to J.24 of the M4.
- The site is closely related to the existing settlement of Christchurch. In light of the site’s location on the boundary of the settlement limit, and its enclosure by existing development / highways / mature landscaping on all boundaries, the development of the site would form a logical parcel of development adjoining Christchurch (and could be considered and presented as appropriate ‘rounding-off’ the existing settlement).
- The site is bound on all sides by existing development, highways and mature landscaping – it is therefore enclosed by ‘defensible’ boundaries to all aspects and cannot be considered to be ‘open countryside’.
- The site is not subject to any significant site constraints and would provide a viable, and deliverable residential development site.
Overview of the Proposed Development

An illustrative sketch layout has been prepared in order to provide an indication of the form of development proposed for the site (as enclosed with this letter). The proposed site has an area of approximately 2.6 hectares.

The proposal provides for a development of circa 25 residential units, set around / off a central access road which provides access to a number of smaller cul-de-sacs providing shared surfaces. A low density scheme is proposed, with an average density of approximately 10 dwellings per hectare. The proposed units would be from Redrow’s Heritage Plus / Premium collection as illustrated on the accompanying architect’s indicative masterplan.

Accordingly, as demonstrated on the indicative layout plan, a high quality, low density scheme is proposed, in order to ensure that the proposals are sensitive in visual impact terms and are consistent with the surrounding form and nature of development.

The proposed scheme seeks to retain the mature trees, hedgerows and woodland which are located around the site boundaries, which will assist in minimising views into the site and would help facilitate the integration of the development into the landscape of the site the wider area. In addition, soft landscaping and areas of open space are proposed to be provided within the site, including a LAP (Landscaped Area for Play). This will provide an additional facility for use by the local residents. Further details on the proposed landscape framework is provided below and in the accompanying Landscape Appraisal.

Vehicular access to the site is proposed to be provided directly from Catsash Road to the site’s eastern boundary. In addition, a pedestrian footpath is proposed to provide a link to Old Hill Lane to the west of the site. In addition, a further pedestrian footpath is proposed to provide a link to the countryside to the north.

As outlined above, the proposed development seeks to provide a low density, high quality scheme, which will provide ‘executive’ style housing from Redrow’s Heritage Plus / Premium collection, which will reflect the character and form of the existing development in Christchurch. This will assist in ensuring that Newport is able to provide for a wide variety of housing choice and styles across the area, in order to ensure that the housing needs of the whole population are provided for. Landscape Appraisal

In order to inform these representations, a Landscape Appraisal has been prepared by Pegasus Group. This is submitted alongside this letter and should be read in conjunction with these representations.

The report aims to determine the degree to which the landscape elements and features of the site and its surroundings can accommodate the proposed residential development.

The report includes a Landscape Masterplan, which demonstrates that the proposed development includes an integrated landscape framework that responds to the constraints and opportunities of the site and which would provide for and enhance the sense of place.

In particular, the proposed development takes into account the range of existing landscape elements and features on the site, and the proposed Landscape Masterplan would look to introduce new and additional planting that would both reinforce and enhance the existing landscape framework and help facilitate the integration of the residential development into the landscape of the site and the wider area.

Currently, the area around the site benefits from significant areas of woodland and tree belts together with substantial field boundary hedgerows and vegetation and well vegetated roadsides. The proposed residential development of the site would seek to retain the majority of the existing landscape elements and features that characterise the site and these would be reinforced and enhanced with new and additional tree and shrub planting including the creation of a green landscape buffer along the northern edge of the site and a green corridor along the south. Furthermore, so as to integrate any residential development into the wider landscape the form and scale of the proposals would be entirely consistent with the adjacent land use and existing residential areas to the south of the site.

In addition, the retention and enhancement of well vegetated landscape buffer along the northern boundary of the site would provide a long term defined edge to the settlement of Christchurch at this location. In terms of the proposal’s effect on landscape character, the proposed retention of the majority of the existing landscape elements of the site with any proposed residential development would allow the existing field pattern to remain and would be consistent with the aspirations of the Chepstow Hill Visual and Sensory Aspect Area which seeks to conserve woodland and hedgerows. So too would the proposed tree and hedgerow planting as part of the proposed development which would reinforce and enhance the existing landscape framework of the site.

Residential development within the site would be perceived as a discrete and relatively small extension to the existing urban area of Christchurch; one physically and visually contained by the existing and proposed vegetation within the site. The residential development on the site would be consistent in terms of scale, form and massing to that already existing within Christchurch and in particular to the area immediately south of the site.

The report undertakes a broad visual appraisal of the site, to determine the impacts of the proposed residential development on the visual amenity of the surrounding landscape. The appraisal confirms that the site is be visually well enclosed and that there is the possibility of reinforcing and enhancing the perception of physical and visual enclosure through the implementation...
and establishment of new and additional planting, which once it begins to mature would supplement and complement the site's existing vegetative screen. The report therefore confirms that the proposed residential development of the site, through the screening and filter effect of existing vegetation, built form and topography, would not cause any unacceptable harm to the visual amenity of either those receptors located in close proximity to the site or those within the wider landscape.

Highways Assessment

In order to inform these representations, Vectos have prepared a Highways Assessment Technical Note. This is submitted alongside this letter and should be read in conjunction with these representations. The note considers the suitability of the site to provide for residential development in highways terms.

In terms of the local highway network, the report confirms that Catsash Road to the east of the site takes the form of a rural lane immediately adjacent to the site. It is approximately 5.5m wide with edge of carriageway marking and grass verges operating within a 30mph speed limit. At its northern end it forms a priority junction with Royal Oak Hill, whilst at its southern end it becomes Christchurch Road and provides a direct route into Newport city centre. In terms of pedestrian facilities, a pedestrian footpath runs broadly south-west from Catsash Road to the Church. This path originates approximately 70m from the site access and provides a segregated pedestrian route to the village. Furthermore, a bus stop is located at the Christchurch cenotaph, which is only 280m from the site access. From this bus stop, there are regular services into Newport.

The route along Catsash Road would likely form part of the pedestrian route into the centre of Christchurch (linking to the pedestrian footpath which provides access to the Church), and therefore to improve this for pedestrians, speed reducing measures are proposed to be provided. In addition there is the opportunity to provide a new bus stop adjacent to the site access, in order to improve the public transport choice for residents. The proposed site access is illustrated on the accompanying Proposed Site Access off Catsash Road Drawing (reference number: W131063/A/01). Additional pedestrian access points will be integrated into the design of the site, including one to the north where there appears to be an existing desire line. It is also envisaged that a pedestrian access will be provided onto Old Hill, further increasing the permeability of the site for pedestrians. These pedestrian links will result in significant pedestrian enhancements.

The assessment estimates that the proposed development of circa 25 units would generate approximately 20 two-way trips in the peak period. It is considered that this quantum of traffic, which would be equivalent to one car every three minutes, which would not be materially noticeable in this location.

Having regard to the above, the report confirms that the site is considered suitable to provide for the proposed development from a transportation perspective, and accordingly, it is considered that there are no transport constraints to the development of the site.

Summary of the Suitability of Site for Development

As outlined above the proposed site at Christchurch represents a site which is considered to be suitable for residential development. In summary therefore, the site is considered to be suitable for residential development for the following reasons:

**Economic Viability**
- There are no economic constraints which will affect the development of the site within the plan period.
- There are no restrictive covenants relating to the use of the land.
- The site is able to served by existing utilities infrastructure.

**Highways / Access**
- Satisfactory highway access can be provided to serve the proposed site and the current highway network is capable of accommodating the proposed traffic movements.
- Local destinations can be safely accessed from the site via the local highway network.
- The site has good access to the wider highway network and strategic highway routes.
- The proposals provide for two additional pedestrian access links through the site, which would further increase pedestrian permeability.
- Speed reduction measures are proposed to be provided on Catsash

**Sustainability**
- The site is located within close proximity of bus stops.
- There is the opportunity to provide additional bus stops adjacent to the site access on Catsash Road.
- The site is accessible to local destinations on foot.
- The settlements of Caerleon and Newport itself provide a range of services / facilities.
- The development of additional residential units will further sustain the existing services within the settlements.

**Environmental Health / Amenity**
## Representation Details

by: (No grouping)  
Filtered to show: (all of) Stage=L; Status=M

<table>
<thead>
<tr>
<th>Rep'n/Para/Policy</th>
<th>Representer</th>
<th>Agent</th>
<th>Accession No</th>
<th>Date Lodged</th>
<th>Late?</th>
<th>Source</th>
<th>Type</th>
<th>Mode</th>
<th>Status</th>
<th>Status Modified</th>
</tr>
</thead>
</table>

- The development of the site will not create a potential nuisance in terms of air, light, noise or waste.
- No adverse impact should arise from the development of the site in terms of contamination.

### Biodiversity / Landscape

- It is considered that the development proposal will not have any negative impact on the surrounding countryside.
- Existing mature trees / hedgerows around the periphery of the site will be maintained, which assist in ensuring that the site is visually enclosed.
- The proposal would not cause any unacceptable harm to the visual amenity of either those receptors located in close proximity to the site or those within the wider landscape.

### Requested / Recommended Changes to the Plan

In light of, and as a consequence of these representations, the particular parts / policies of the Plan subject to these representations, and which are considered to need amendment are:

- **Policy SP5 Countryside** – Removal of the site from the countryside designation.
- **Policy SP10 Residential Requirement** – Increase in the overall housing numbers (to reflect deliverability issues with brownfield sites) and allocation of appropriate greenfield sites to ensure that the needs of the Authority are provided for, and also to provide a higher ‘contingency’ for flexibility over the Plan period.
- **Policy H1 Housing Supply** – Increase in the overall housing numbers, including an increase in the contingency provision, and allocation of the proposed alternative site for residential development.

In addition, the Proposals Map of the LDP needs to be amended to include:

- The Alternative Site as a housing allocation (and within settlement limits)
- Removal of the site from the countryside designation
- Removal of site from special landscape designation

It is respectfully urged that the Plan is amended accordingly to ensure its ‘soundness’.

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### Speaking at Public Examination

<table>
<thead>
<tr>
<th>Item Question</th>
<th>Tick-box reply</th>
</tr>
</thead>
<tbody>
<tr>
<td>12</td>
<td>Speaking at Public Examination</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Item Question</th>
<th>Council Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>Soundness of LDP</td>
</tr>
</tbody>
</table>

12/02/2014
Justification of Requirement
Following representations at the Deposit LDP stage the housing requirement figure has been justified and increased from the proposed Welsh Government Population projections. There is scope for an authority to deviate from the WG population projections but this deviation is required to be well evidenced. The NLP assessment sets out this evidence base and illustrates that Newport, as one of the few areas in Wales with an anticipated population increase noted in the Census, is set to grow and reflects the Council’s policy aspiration for growth. It should be recognised that the majority of the sites (46 of 55) have planning permission or permission subject to a Section 106 agreement. This established supply with clear market intent illustrates not only that a growth strategy is appropriate but achievable.

As noted above, the Plan identifies its housing requirement for the plan period based on an assessment of need and this is also true of its employment land requirements. The clear strategy for the Plan is for growth and it will be through the successful implementation of the policies of the Plan that this will be achieved. There is a clear link between housing supply and economic growth which is why the supply will be monitored annually.

Reliance on previous Development Plan sites
The Local Development Plan does have a number of housing sites which were identified within the Unitary Development Plan. In total there are 15 of the 55 housing sites which continue into the new plan. The majority of these sites have progressed significantly from the UDP, as noted below:

1. Land adj. McReadys. As of 1st April 2013 the developer is on site preparing the site for development.
2. Eastern Expansion Area. Planning permission has been granted with a signed Section 106 agreement. Gallagher Estates have confirmed through the JHLAS process that they will be delivering units on site in 2015.
3. Glebelands. This site has an extant planning permission associated with the school site adjacent to the residential area. The land has recently been sold to a developer.
4. Monmouthshire Bank Sidings. Redrow are on site and progressing.
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10. Trinity View. The developer is on site and progressing.
11. Glan Lyn. The developer is on site and progressing. A third developer (St Modwen) are anticipating to begin work on Phase 2 in 2015.
12. Mill Street. The site is owned by NCC who will market the site.
13. Herbert Road. This site is adjacent to the Glebelands site noted above. The site is compliant with the overall strategy of the LDP being a brownfield urban site in need of regeneration. There is no application on the site but the area land owner notes their intention to sell the site for development.
14. Whitehead Works. This site is part of a Welsh Government regeneration scheme, which anticipates delivery to begin in 2016.
15. Bideford Road. This site is compliant with the overall strategy of the LDP being a brownfield urban site with potential for regeneration. There is no application on the site but the area is the remaining part of a housing estate development.

The information above clearly shows that although there are a number of sites which have continued from one development plan to the other they have in the main progressed significantly or that they will be delivered within the plan period. It is also important to note that it was made clear through the UDP process that the growth proposed in the east of the city (i.e. Glan Lyn and Llanwern Village) was not anticipated to be delivered wholly within the UDP plan period.

Deliverability and Supply
The Plan identifies its housing and employment land supply for the plan period which is based on an assessment of need. The clear strategy for the Plan is for growth and it will be through the successful implementation of the policies of the Plan that this will be achieved. There is a clear link between housing supply and economic growth which is why the supply will be monitored annually.

The Plan does however provide enough land to ensure that a 5 year supply is met and, that although the annual build rate is higher than currently achieved, even when taking into account the residual method of calculation the Council has provided an adequate supply of land which has been agreed with the industry through the JHLAS process.
Planning Policy Wales sets out the overarching requirement for development to be placed on brownfield sites in preference to greenfield sites. The plan allocates 82% housing units on brownfield sites with the remaining 18% of units on greenfield sites (these calculations excludes the completions, windfall and small sites supply figures). The LDP is therefore compliant with Planning Policy Wales in terms that it has followed the search sequence criteria starting with the re-use of previously developed land and buildings within settlements which are located in areas accessible to jobs and services, where there is existing infrastructure and the scope to build sustainable communities.

The representation raises a concern that one of the reasons for a drop in housing delivery over the past few years is due to the lack of greenfield sites. This is not an accurate picture of the reality of housing supply in Newport. Brownfield sites are being delivered in the same economic environment as those greenfield sites with planning permission which do not have the same level of abnormal costs to consider.

As illustrated above the perception that the Plan is overly reliant on sites inherited from the UDP period is not well founded. In addition a number of the sites outlined by the developer as being undeliverable are in fact progressing e.g. Alcan. Not all the sites noted are counted as part of the housing supply due to the lack of evidence of deliverability e.g. Newport Athletic Club. The Council has been realistic in its approach to the housing supply set out in the Plan which is based on the annual JHLAS process to ensure that the sites can be delivered to ensure the strategy is met.

The rate of windfall sites is also questioned and as noted in Planning Policy Wales there is a need to consider the supply from such sites. The LDP based its figures on a review of the past trend of windfall supply which has been drastically cut to reflect the need for the Plan to remain flexible whilst concentrating growth on allocated housing sites and tight settlement boundaries. The plan will be monitored as to the percentage of houses developed on allocated housing sites to ensure that the housing policies of the plan are being effectively implemented.

Range and Choice
The supply of housing is considered to provide for a clear range and choice of housing which is a clear concern for many representors. The housing sites within the Plan are located across the City, with a clear focus on regeneration in the east as per the established strategy. The Plan provides a supply of affordable units for a mixture of needs as well as providing a mix of family homes and inner city living to cater for the broad housing market. The opportunity to provide homes in more rural locations has been investigated and there was no clear evidence to justify expansion to existing settlements. The Plan therefore has provided the opportunity for exception sites where such justification can be produced.

Flexibility
As the representation notes there is no set flexibility figure required for housing supply within development plans. However, during the examination of the Brecon Beacons National Park LDP WG noted a notional figure of 10% but that needed to reflect local circumstances. Other authorities within South East Wales have a range of 12-20% flexibility. It is good practice to allow for unknowns and the need for flexibility within a development plan is inherent from National Planning Policy. In Newport’s case the majority of the housing supply has planning permission or is being progressed. Those remaining 9 sites without planning permission are in line with the overall strategy or regeneration needs of the plan. Together they provide a 12% oversupply which is considered appropriate to enable plan to cope with uncertainties that may arise over the plan period.

Strategy compliance and delivery.
It is considered that the plan provides a more than adequate supply of housing, both market and affordable, which is both deliverable and viable. Many of the sites have progressed since the Revised Deposit Plan was written and there is a steady supply of housing being achieved across Newport. The Plan identifies its housing and employment land supply for the plan period based on an assessment of need. The clear strategy for the Plan is for growth and it will be through the successful implementation of the policies of the Plan that this will be achieved. There is a clear link between housing supply and economic growth which is why the supply will be monitored annually.

The work undertaken by NLP did consider the influence from Cardiff but the final recommended scenario did not take into account the potential cross-boundary issues with Cardiff that were highlighted by Edge Analytics as it does not take account of the recalibration that resulted in a substantial adjustment to the population projections for Newport. The reason for this is that it has not been possible to verify the analysis that informed the figures presented by Edge Analytics. This again points towards an upward pressure in the local housing requirements for Newport compared to the 2008 Welsh Government projections.

The site is a greenfield site adjoining the village boundary of Christchurch, allocated as Countryside. The review of the village boundaries set out in the Settlement Boundary Methodology Paper (June 2013) concludes that the Christchurch village boundary should remain tight to the village form.

The plan seeks to promote the reuse of Brownfield sites in preference to extensive use of Greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities.
The forecast housing need has been assessed in the context of population and employment projections and current market realities. The plan allocates sufficient land to meet this requirement. Additional housing allocations in a rural location cannot therefore be justified. Furthermore, the release of the representation site for housing would be contrary to the Council’s strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

It is recommended that the site at Christchurch is not allocated for residential use in the Local Development Plan.
Representation Details

Document: Revised LDP, p.21
Policy: SP05
Summary: Seeks the removal of the site on land at Christchurch from the countryside designation.

Item Question Representation Text
10 10 Soundness Test
   C2, CE1, CE2, CE3, CE4
11 11 Representation
   Seeks the removal of the site on land at Christchurch from the countryside designation.
   Please refer to the accompanying cover letter and Annex for further details.
12 12 Speaking at Public Examination
   Yes
2 2 Soundness of LDP
   Tick-box reply
   No

Item Question Council Responses
13 13 Council Response
   The site is within a proposed Countryside allocation. The plan seeks to promote the reuse of brownfield sites in preference to extensive use of greenfield sites as this generally performs better in sustainability terms for a variety of reasons. As well as protecting the countryside, this will help to reduce the need to travel, particularly by car, and make best use of existing infrastructure, both physical and social, helping to maintain existing communities. The forecast housing need has been assessed in the context of population and employment projections and current market realities. The plan allocates sufficient land to meet this requirement. Additional housing allocations in a rural location cannot therefore be justified. Furthermore, the release of the representation site for housing would be contrary to the Council’s strategy of accommodating growth in Newport within the urban area and within the defined Eastern Expansion Area as part of a comprehensive sustainable development. The Council’s strategy follows the search sequence approach advocated in Planning Policy Wales in paragraph 9.2.8.

A background paper ‘Delivery and Implementation’ has been produced to expand on the information supplied in Chapter 13 of the Deposit LDP. This sets out the proposed phasing, constraints and infrastructure requirements for each allocation. The Delivery of each site is considered here, setting out the justification for its continuation in the plan based on evidence from developers and landowners. Some of the large brownfield sites allocated within the previous Unitary Development Plan have started construction e.g. Glan Llyn with 4000 homes and employment uses on the site. The impact on development by the economic recession is to be considered and the plan takes a long term view across the entire plan period.

The LDP sets out a strategy for growth which allocates an adequate supply of land for residential and employment uses. The supply of this land is not concentrated in one area but across the City. It is recognised that growth in the east is significant but the west has not been overlooked with large brownfield sites allocated at Novelis, former Whitehead Works and Monmouthshire Bank Sidings. The review of village boundaries has clearly considered the need for expansion in these areas and following their assessment boundaries have been tightened and allocations resisted due to the unsuitability of sites proposed in these unsustainable locations.

Notwithstanding the representation submitted in support of this site, the Council maintains the position that the LDP is sound and relies on the evidence which supports it. In this respect, the Council does not support this site. The countryside allocation should therefore remain.
### Representation Details

**by:** (No grouping)  
**Filtered to show:** (all of) Stage=L; Status=M

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<thead>
<tr>
<th>Rep'n/Para/Policy</th>
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</thead>
<tbody>
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<td>Redrow Homes Ltd</td>
<td>Geraint John Planning</td>
<td>06/08/2013</td>
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**Document:** Revised LDP, p.24  
**Policy:** SP10  
**Summary:** Seeks to increase overall housing numbers and inclusion of new site at Christchurch

<table>
<thead>
<tr>
<th>Item Question</th>
<th>Representation Text</th>
</tr>
</thead>
<tbody>
<tr>
<td>10</td>
<td>Soundness Test</td>
</tr>
<tr>
<td>11</td>
<td>Representation</td>
</tr>
<tr>
<td></td>
<td>Seeks to increase the overall housing numbers, and allocate the proposed alternative site on land at Christchurch.</td>
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<thead>
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The forecast housing need has been assessed in the context of population and employment projections and current market realities. The plan allocates sufficient land to meet this requirement. Additional housing allocations in a rural location cannot therefore be justified.
It is recommended that this proposed site is not included in the Local Development Plan for development.
I write to you as the owner of the retail quarter at Celtic Springs. Our tenants include, Greggs, Bacaro, MJ’s and Kumon. All parties at Celtic Springs, Imperial Park and Cleppa Park have fought over a long period to maintain this business location as ‘something special’ where we have not compromised on quality and as such have attracted blue chip organisations and facilities to support this location. This has been maintained throughout the worst financial circumstances in Britain’s peace time. Newport County Councils proposal for a 20 acre travellers site will put that level of quality and its development prospects at risk. Even in these more enlightened times of racial equality and a better understanding on travellers needs and aspirations this proposal is simply not compatible.

I would object on the grounds of incompatibility of uses and protection of existing employment sites.

I am aware that a large company is considering Celtic Springs for a project of 250-300 jobs, highly paid jobs at that. It would enormously help our tenants if this project were to be realised. This company has had cause to ask about these proposals and indeed have now deferred their decision. This proposal is putting at risk projects of significance for Newport and it is incomprehensible that the Council would put forward proposals that are materially damaging the city’s prospects. Indeed I would anticipate the city lose employers from this location over time. Business locations are in fierce competition and must be seen to have all the right infrastructure and no drawbacks. This will provide decision makers, rightly or wrongly, a ready-made excuse to reject Newport.

This is the wrong location for this facility. The sooner Newport publicly rejects this proposal the better.

Council Response
It is acknowledged that the site is in close proximity to existing business premises and will be adjacent to site EM1, which is allocated for new employment. The site will be managed by the Council and appropriate security will be provided. Fencing will be provided around the site; however an appropriate balance needs to be struck between making the site visually acceptable but also secure. Screen landscaping may also be used to make the boundary more visually acceptable. The area is already often used by unauthorised encampments. The proposed site is intended to provide an official, managed and controlled transit site, fulfilling the Council’s duty and enabling the Police to use its powers to move on other unauthorised encampments.

Alternative Gypsy/Traveller sites have been assessed by the Council and findings can be read in the Alternative Sites Assessment Report.