

Newport City Council  
Local Development Plan

Council Response to Matters Arising

Hearing Session 7: Employment



- 1. Amend SP17 and EM1 allocated additional employment land amounts to reflect updated figures and totals.**
  - 1.1. See appendix 1 for updated figures and totals.
- 2. LPA to review Policy EM2 allocations, as follows:**
  - **Move to EM1: EM2(i), EM2(iii), EM2(vi), EM2(ix)**
  - **Delete: EM2(iv), EM2(v), EM2(viii), EM2(x)**
  - 2.1. See updated Policy EM1 in appendix 1. The allocations deleted from EM2 and not included in the updated EM1 policy have no employment element, and remain allocated as housing allocations (EM2 (iv), EM2 (viii) and EM2 (x)), or have no specific allocation (EM2 (v)) and would be assessed against general development policies.
- 3. LPA to delete Policy EM2 but to consider whether/how the Crindau allocation (EM2(vii)) should be retained as a mixed use regeneration allocation.**
  - 3.1. The allocation is to be deleted as there is no employment element proposed, and there is no certainty regarding delivery of development on the site. Any proposal to come forward for the area would be assessed against general development policies in the Plan.
- 4. LPA to consider adjusting the settlement boundary in respect of Llanwern former tipping area (EM2(ii)).**
  - 4.1. Llanwern former tipping area (EM2 (ii)) is to be deleted as there is no requirement for the additional employment land, and there is no certainty regarding delivery of development on the site. The settlement boundary is amended accordingly.
- 5. LPA to adjust allocations on Proposals Map to avoid overlapping or ambiguous allocations and accurately reflect M4 relief route safeguarding.**
  - 5.1. The park and ride element at Llanwern is to be shown as a safeguarded area and marked on the Constraints Plan. The M4 protected corridor has been amended to reflect the correct safeguarded route. The EM1 allocations that were affected by the route have been amended and were consulted upon in February 2014.
- 6. LPA to amend Policy EM3 and supporting text, to remove reference to 'allocating' new employment land, to make clear what complementary uses would be acceptable, and to reword the element relating to national/local policies and port authority operational requirements.**
  - 6.1. See Policy EM2 (formerly Policy EM3) in appendix 1.

**7. LPA to amend Policy EM4 to tighten it up and recast along the following lines: “Proposals for the loss or reduction of employment land will be resisted unless...”; to reconsider the criteria to ensure that they are clear and consistent with TAN 23; and to ensure that it is clear what it applies to (e.g. employment space in the B use class, either existing or permitted).**

7.1. See Policy EM3 (formerly Policy EM4) in appendix 1.

**8. LPA to amend Policy EM1 to make it clear that allocations will be protected for employment use.**

8.1. See Policy text in EM1 (appendix 1).

**9. LPA to merge Policies SP17 and SP18, and the supporting text, to create single strategic level employment land policy.**

9.1. Both policies have been merged. See Policy SP17 (appendix 1).

**10. Amend Plan text at paras 6.8, 6.11, 6.27 to avoid statement that the LDP safeguards the route of the M4 (see attached note with possible change to wording).**

10.1. See appendix 1.

## Appendix 1 – Updated Strategic Policy and Employment Chapter

### SP17 Employment Land

#### **PROVISION WILL BE MADE FOR APPROXIMATELY 160 HECTARES OF EMPLOYMENT LAND FOR THE PERIOD 2011 - 2026.**

- 2.60 This requirement has been assessed taking into account:
- labour supply projections, reflecting the population projections;
  - historic take-up of employment land; and
  - employment sector projections.
- 2.61 The employment forecasts for Newport have been based on Experian Economic forecasts. Newport's economy is therefore expected to grow by an additional 7,400 jobs over the LDP period.
- 2.62 In terms of allocating space to support delivery of these jobs, it has been identified that Newport requires a minimum of 21.5 hectares of employment land specifically for Class B uses, including offices and industrial/warehousing uses. There needs to be sufficient suitable warehousing land to meet the gross requirements coming forward in advance of industrial land disposals projected by the decline in industrial employment over the Plan Period. For this reason an additional 13.5 hectares of land has been allocated on the grounds of being the type of land which is fit for purpose by today's market standards.
- 2.63 Therefore, in total, the Plan has a minimum requirement of 35 hectares for net employment land for the Plan Period. The Plan identifies a total supply of 160 hectares of employment land which exceeds the minimum requirement, but is required so that sufficient flexibility can be provided to promote growth and also take account of various constrained sites which cannot be considered as 'normal supply'. For example, EM1 (i) Duffryn and EM1 (ii) East of Queensway Meadows are controlled by the Welsh Government and only designated for single large user projects of at least 10ha at a time. Similarly, EM1 (iv) Solutia will only be released for development if it is within Solutia's interest and does not compromise their existing facility. Therefore, 160ha is considered an appropriate land supply to provide sufficient flexibility for future employment growth. The take-up of land for the various types of employment uses will continue to be monitored.
- 2.64 The land allocated under Policy EM1 relates to net additional requirement for employment land. The land is needed to accommodate net growth in the stock and any losses from the existing employment stock will need replacing. Policy EM3 will be used to assess proposals for the redevelopment or alternative uses of existing employment sites.
- 2.65 The Plan has a focus on urban regeneration, and seeks to provide employment on such sites. These tend to be relatively small in scale, though may sustain high density uses. There may, however, be a need at some time for larger sites with lower density uses, which could not be accommodated within the urban area. More peripheral locations, adjacent to other employment uses and good transport links, may therefore be the only realistic prospect if such uses are to be located in the Newport area at all. Provision is made therefore, in order to facilitate the achievement of the Economic Development Strategy.

- 2.66 Sites within the inner urban area, although they tend to be small, provide valuable opportunities for higher density development in sustainable locations. The recent office developments in the George Street area provide good examples of the value of such locations. They are accessible by a choice of means of transport, including walking, cycling and public transport, and they are close to the City Centre, which helps to sustain and improve the City Centre's viability and vitality.
- 2.67 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 this area, and there are business advantages in locating near to other similar uses. If interested parties were to decide on a railway station in relative proximity to the site, then this could potentially enhance accessibility of the area. Where development may impinge upon the Site of Special Scientific Interest (SSSI), particular care will be needed to ensure the protection of the features of importance, which is primarily the network of reens and the associated flora and fauna. Paragraph 2.56 sets out how this will need to be addressed. More information can be found in Policy GP5.
- 2.68 South East Newport is one of the older industrial areas of the City, but there are opportunities for further development and redevelopment. This area is well connected to the transport network, and if interested parties were to decide on a railway station in relative proximity to the site, then this could potentially enhance accessibility of the area. With major housing growth proposed locally, there will be clear benefits in the provision of employment in this area. Where development may impinge upon a (SSSI), particular care will be needed to ensure the protection of the features of importance, which is primarily the network of reens and the associated flora and fauna.
- 2.69 In addition to the potential impact on the River Usk Special Area of Conservation (SAC), developers must consider their potential impact on the Severn Estuary designated sites. The extent of activity of the birds that are features of the Severn Estuary Special Protection 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 these 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.

<b>Relevant Objectives and Background Paper</b>
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<b>Objectives:</b> 1. Sustainable Use of Land, 3. Economic Growth
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<b>Background Paper:</b> Employment Land Review, Roger Tym and Partner, 2013.
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## 6 Employment

- 6.1 The overall employment land requirement is set out in Strategic Policy SP17 Employment Land.

### Newport Economic Context

- 6.2 Newport has seen both significant declines and recoveries in the number of people in work over the decade to 2009<sup>1</sup>. This is symptomatic of an economy undergoing significant structural change or one highly exposed to the global economy, both of which apply to Newport. Manufacturing employment has declined, with base metal manufacturing particularly affected. Growth in employment has occurred, however, in four major sectors: health and social work, education, public administration and transport and communication. Wholesale and retail is also a major employment sector for Newport, but in 2010 was only marginally above its proportion in 2000. Finance and real estate started with a higher proportion of total employment than wholesale and retail in 2000, surged to be the biggest sector in 2006, but then fell back significantly each year to 2009.
- 6.3 The City now needs to respond to the current and likely future economic circumstances, and in the context of its position in the wider world. Newport has advantages of connectivity, which have been important in the past in securing inward investment, and which continue to be a positive factor both in attracting new employers and in encouraging indigenous growth.
- 6.4 The allocation of 160 hectares for employment land is made to secure a supply of new, deliverable development land to allow Newport to respond flexibly to the future needs of business. It also provides land to offset any unforeseen losses to the Newport stock of sites.
- 6.5 It is considered that the Plan provides a good range of land allocations within EM1 so the right type of development can be located in the most appropriate location. For example, office development can be supported at City Centre locations, heavier industry will be more suited to locations at Solutia and east of Queensway Meadows, while medium sized prestige business park development can be supported at Duffryn and larger units for distribution located at Gwent Europark.

### EM1 Employment Land Allocations

#### THE FOLLOWING SITES ARE ALLOCATED AS EMPLOYMENT LAND ALLOCATIONS:

- i) DUFFRYN – 38.5 HECTARES FOR B1, B2, AND B8 USES;
- ii) EAST OF QUEENSWAY MEADOWS, SOUTH OF GLAN LLYN – 22 HECTARES FOR B1, B2 AND B8 USES;
- iii) CELTIC SPRINGS – 6 HECTARES PRIMARILY FOR B1 USE;
- iv) SOLUTIA – 35 HECTARES FOR B1, B2, B8 AND LEISURE USE;
- v) GWENT EUROPARK – 16 HECTARES FOR B8 DISTRIBUTION USES;
- vi) LAND OFF CHARTIST DRIVE, ROGERSTONE – 2 HECTARES FOR B1, B2 AND B8 USES;

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<sup>1</sup> See page 8 of the Employment Context Paper prepared for the Council by Aecom, available at: [http://www.newport.gov.uk/stellent/groups/public/documents/plans\\_and\\_strategies/cont636721.pdf](http://www.newport.gov.uk/stellent/groups/public/documents/plans_and_strategies/cont636721.pdf)  
Newport City Council Economic Development Strategy 2011- 2015 is available at: [http://www.newport.gov.uk/stellent/groups/public/documents/plans\\_and\\_strategies/cont639411.pdf](http://www.newport.gov.uk/stellent/groups/public/documents/plans_and_strategies/cont639411.pdf)

- vii) **LLANWERN FORMER STEELWORKS EASTERN END – 35.5 HECTARES FOR B1, B2, AND B8 USES;**
- viii) **PHOENIX PARK (FORMER PIRELLI WORKS), CORPORATION ROAD – 2 HECTARES FOR B1, B2 AND ANCILLARY USES;**
- ix) **GODFREY ROAD (REAR OF STATION) – 2 HECTARES FOR BUSINESS AND COMMERCIAL USES;**
- x) **CARDIFF ROAD (MONMOUTHSHIRE BANK SIDINGS) – 1.2 HECTARES B1 USES.**

**THE ALLOCATIONS WILL BE PROTECTED FOR EMPLOYMENT USES, AND ALTERNATIVE USES FOR THE SITES WILL BE RESISTED.**

### **Duffryn**

- 6.6 This is a large scale strategic development area well connected to the M4, containing some of the most prestigious employment developments within Newport. It is a well established area that has proceeded over a number of years on the basis of the Council's informal Duffryn development strategy set out in the 1990's. There are some areas of development potential still available on this prestigious site for B1, B2, and B8 uses; however, the owner (Welsh Government) has designated the site for single large user projects of at least 10ha at a time.
- 6.7 The allocation at Duffryn may result in the loss of habitat (and disturbance of adjacent habitats) in particular it may impact upon the Percoed Reen. Paragraph 2.56 sets out how this will need to be addressed. Therefore, in accordance with Policy GP5, 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. Part of the allocation also lies within the St Brides Site of Special Scientific Interest (SSSI). Conservation and enhancement of the SSSI features will need to be central to the consideration of any future employment proposals for this area. The developer will also ensure there is no adverse impact on the Imperial Park substation operated by National Grid.

### **East of Queensway Meadows, South of Glan Llyn**

- 6.8 This site is well connected to the Southern Distributor Road and is an excellent strategic location for B1, B2 and B8 uses. Development of this area is affected by a Welsh Government Direction safeguarding the route of the M4 relief road (see constraints map); any development proposals will need to reflect this. The Welsh Government's M4 Corridor Enhancement Measures Study is looking at a wide variety of options. The Strategic Flood Consequence Assessment for the Plan identifies this site as requiring a Flood Consequence Assessment at the planning application stage. This assessment would require hydraulic modelling to be undertaken.
- 6.9 The allocation at East of Queensway Meadows may result in the loss of habitat (and disturbance of adjacent habitats) in particular it may impact upon Reens. Paragraph 2.56 sets out how this will need to be addressed. In accordance with Policy GP5 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. The allocation lies adjacent the Nash and Goldcliff Site of Special Scientific Interest (SSSI), and proposals should have consideration of the designation. Similar to EM1 (i) Duffryn, this site is owned by Welsh Government and has been designated for single large user projects of at least 10ha at a time.

### **Cleppa Park/ Celtic Springs**

- 6.10 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 Offices. Proposals on this site should also have regard to Policy SP18.

### **Solutia**

- 6.11 This site is well connected to the Southern Distributor Road and is an excellent strategic location for B1, B2 and B8 uses. Proximity to Newport International Sports Village also gives it potential for leisure uses related to the Sports Village. Development of this area is affected by a Welsh Government Direction safeguarding the route of the M4 relief road (see constraints map); any development proposals will need to reflect this. The Strategic Flood Consequence Assessment for the Plan identifies this site as requiring a Flood Consequence Assessment at the planning application stage. This assessment would require hydraulic modelling to be undertaken.
- 6.12 The allocation at Solutia may result in the loss of habitat (and disturbance of adjacent habitats); in particular it may impact upon Reens. Paragraph 2.56 sets out how this will need to be addressed. In accordance with Policy GP5 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. The allocation lies adjacent the Nash and Goldcliff Site of Special Scientific Interest (SSSI), and proposals should have consideration of the designation. A SINC is located on part of the site, and measures may be required in order to mitigate any impact upon the designation. It is noted that this site will only be released, if the owner (Solutia), considers development will not compromise their existing facility and it is within their interest.

### **Gwent Europark**

- 6.13 This development area is shared with Monmouthshire County Council administrative area. The site is partly developed with 16 hectares remaining for B8 distribution uses. It is very well located for access to the motorway and rail network. The site is located within a SSSI therefore the conservation and enhancement of the SSSI features will need to be central to the consideration of any future strategic employment proposals for this area and satisfy the relevant requirement of GP5. Paragraph 2.56 sets out how the impact upon the reens will need to be addressed. Environmental Impact Assessment Regulations will need to be referred to. Proposals on this site should also have regard to Policy SP17.

### **Land off Chartist Drive, Rogerstone**

- 6.14 This site is allocated to retain and encourage the focus on employment uses in this location.

### **Llanwern Former Steelworks Eastern End**

- 6.15 With planning permission granted in March 2010, the 35.5 Hectares of employment land (B1, B2 and B8) will act as a buffer to the new housing on the western end at Glan Llyn. An area adjacent the employment allocation has been safe-guarded as a Park and Ride facility for the proposed Rail Station as allocated in Policy T1.

### Phoenix Park (Part of the Former Pirelli Works)

- 6.16 In May 2011 this site was granted outline planning permission for B1 and B2 employment uses on this site.

### Godfrey Road (Rear of Station)

- 6.17 Being adjacent to the newly redeveloped Newport train station, this site is ideal for office (B1) development. A high quality of design will be sought in this prominent location in the City, and proposals will be expected to have regard to the masterplan for the site.

### Cardiff Road (Monmouthshire Bank Sidings)

- 6.18 Permission was granted on appeal in January 2011 for a residential redevelopment scheme, (Site H1(14) Monmouthshire Bank Sidings) located south of this employment allocation. This employment site was part of the same planning appeal and is now subject to a Unilateral Undertaking. The Unilateral Undertaking identifies this 1.2 ha site for possible employment purposes. The developer is required to undertake a joint marketing strategy for a period of two years to secure and promote the land for employment purposes. The Unilateral Undertaking restricts the end user(s) to B1 planning uses only. In the event that a marketing strategy does not identify a commercial developer who is willing to proceed, then the developer will discuss the potential future planning uses of the land with the Council, including B8, Health Trust and residential development could be an option.

### EM2 Newport Docks

**THE EXISTING 206 HECTARE EMPLOYMENT SITE AT NEWPORT DOCKS IS PROTECTED FOR B1, B2 AND B8 USES. THE COUNCIL WILL SUPPORT SUCH DEVELOPMENT WHERE IT CAN BE DEMONSTRATED THAT THE DEVELOPMENT IS COMPLEMENTARY TO AND DOES NOT HINDER THE OPERATIONAL USE OF THE PORT.**

- 6.19 There is a surplus of land within Newport Docks which could better meet Newport's economic development objectives if brought into alternative, productive, employment generating uses within Use Class B1, B2 or B8. Proposals should be in accordance with Technical Advice Note 18 which sets out guidance on the assessment of development in docks areas. Complementary uses should relate to the primary purpose of the port operation namely bulk handling, warehousing and storage facilities. Complementary uses may also include energy and infrastructure projects.
- 6.20 Newport Docks provides a particular opportunity to provide for port related employment. One aspect of this is in energy generation, where it has certain locational advantages, including accessibility for fuel and distance from residential or other uses upon which there might be an impact. Recent schemes granted planning permission have included a biomass powerplant, the erection of wind turbines and the installation of solar PV panels. Development that reduces emissions of greenhouse gases in a sustainable manner similar to those already permitted, including renewable and low carbon energy generation, will be supported.
- 6.21 A Welsh Government Direction concerning a safeguarding corridor for the M4 relief road affects the site (see constraints map). The route is still subject to consultation,

and has not at this stage been confirmed. Development proposals will need to have regard to this.

- 6.22 The allocation at Newport Docks may result in barriers to movement and disturbance of features of the River Usk as well as the qualifying bird species of the Severn Estuary SPA and Ramsar site. Effects can be avoided or minimised through appropriate mitigation measures. 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.
- 6.23 The plan sets out within its Mineral Policies the need to safeguard wharves and rail for the continued transportation of aggregate. Proposals within the dock area will need to consider their impact upon the future transportation requirements as the majority of aggregate supply for Newport is based on marine won sand and gravel supply.

### **EM3 Alternative uses of Employment Land**

#### **DEVELOPMENT PROPOSALS PROMOTING ALTERNATIVE USES ON EXISTING EMPLOYMENT SITES WILL BE RESISTED UNLESS:**

- i) THE SITE HAS BEEN MARKETING FOR EMPLOYMENT PURPOSES FOR A MINIMUM OF 12 MONTHS;**
- ii) THERE REMAINS A SUFFICIENT RANGE AND CHOICE OF EMPLOYMENT LAND AND PREMISES TO MEET LDP REQUIREMENTS AND LOCAL DEMAND;**
- iii) THE DEVELOPMENT HAS NO ADVERSE IMPACT ON EXISTING OR ALLOCATED EMPLOYMENT SITES;**
- iv) THE DEVELOPMENT HAS NO ADVERSE IMPACT ON AMENITY OR THE ENVIRONMENT.**

- 6.24 The Policy relates to the assessment of alternative development proposals on business, industrial and warehousing land. It applies to all land within the B1, B2 and B8 Use Classes Order. The Policy should be used in relation to established employment areas; alternative proposals on new employment allocations set out in Policy EM1 will be resisted.
- 6.25 In relation to Criterion i), proposals for alternative uses should include information that demonstrates that the site and property has been marketed for a new employment use and that an on-going use for employment purposes is no longer viable.
- 6.26 When submitting an application for the alternative use of an employment site, the Applicant or Agent will be expected to provide a statement to the Council to ascertain how long a particular site has been marketed for employment use and the degree of interest.
- 6.27 Information from the Agent or Applicant regarding demand (in relation to Criterion i)) will usually take the form of a marketing report or correspondence from the relevant property agent. The content should include:
- Details of existing occupiers, if any;

- If appropriate, the length of time a property or site has been vacant;
  - The type of use which the property/site has been marketed for, and what the marketing strategy involved and its duration;
  - The amount of interest in the site during the marketing period - this should detail the number of queries, the type of use sought, and if known, the reason for not pursuing the initial query; and,
  - Whether the relocation of existing occupiers to other suitable accommodation will be facilitated.
- 6.28 If demand has been established on a site for employment use, this is taken as evidence of a need to retain the site for such purposes. The site should be marketed at a realistic price reflecting the employment status of the site, for a period of not less than 2 years. The demand information provided may be economically sensitive, and will normally be treated as confidential.
- 6.29 In relation to Criterion ii), proposals for alternative uses on either existing land in industrial/business use will need to consider the impact on future supply levels. Proposals affecting employment land must be closely scrutinised to assess the extent to which the loss of the site would itself, or cumulatively with other losses, have an adverse effect on the range and choice of development opportunities. The cumulative impact of other losses will include all extant planning permissions or applications with a resolution to approve subject to the signing of a legal agreement. The maintenance of a portfolio of sites, particularly of good quality, is vital to achieving successful economic development.