Main discussion matters

1. H1(55) Woodland Site, Ringland (300 units).

- What evidence demonstrates that allocation H1(55) is needed to deliver the Plan's housing requirement?
  
  No comment

- What evidence indicates that the allocation would be likely to prevent existing committed sites in the locality from proceeding? Is a mechanism to guard against such an eventuality necessary and feasible?
  
  No comment

- Can adequate vehicular access be gained from the southern distributor road to the land west of Llanwern village? Is land to the west of the houses on Cox Hill needed to facilitate satisfactory access?
  
  No comment

- Would the allocation lead to undue loss of semi-natural habitats - does the plan provide adequate protection in this respect?
  
  Aerial imagery indicates that the site contains areas of semi-natural habitats, and from discussions with the NCC Biodiversity Officer, the site may include habitats which have the potential to support Great Crested Newts (GCN), a European protected species. We understand that NCC had intended to undertake further survey work at the site, but that to date, this work has not taken place.

- To ensure that the allocation is consistent with the Plan’s objectives and strategy and flows logically from the Revised LDP objective to protect and enhance the quality of the natural environment, the Plan should be amended to identify the semi natural habitats at the site and the considerations that developers of the site will need to address as part of any application for the development of the site. As highlighted in our response to the Inspector’s questions for session 10 of the LDP examination, such details/site information could be included for allocated sites in an annex to the Plan which identifies the key issues and constraints associated with each allocation that will need to be considered and addressed by potential developers.

- The relevant text relating to H1(55) should specify that any development at the site will be required to:
  - undertake an appropriate habitat survey;
  - undertake a preliminary survey to assess the potential for GCN and other protected species that might be present on this site, and
- provide details of measures to protect natural heritage interests found to be present at the site.

The inclusion of such text will ensure that potential developers at the site are aware of the importance of the site and the key considerations associated with protecting its interests at the earliest opportunity.

2. H1(12) Former Tredegar Park Golf Course (150 units).

- Does the Plan correctly identify the site area for allocation H1(12) – on what basis is it calculated as 5.2ha?
- Is the basis for the estimated capacity of 150 units sound?
- Is there a coherent and consistent basis for inclusion of the land within designation SP8(vii) Tredegar Park SLA, given its character as a former golf course and its allocation for housing development?
- Is the indicative delineation of a walking and cycling route pursuant to policy T5 materially prejudicial to the development of the site for housing?

No comments.

3. H1(50) Herbert Road and Enterprise House (62 units).

- What evidence demonstrates that allocation H1(50) has been fully assessed against the requirements of TAN 15 Development and Flood Risk, taking account of current Development Advice Maps?
- What evidence demonstrates that all of the requirements of sections 6 and 7 of TAN 15 are satisfied in relation to the allocation for the lifetime of the development?
- Has further work been carried out to justify the allocation, with sufficient assessment to demonstrate that risks and consequences can be acceptably managed in line with TAN 15? Has NRW been advised of the additional work and been given opportunity for further comment? What is its current position on this matter?

Natural Resources Wales replied on 26th July 20914 (ref. 1898716/C.09.90.07). We commented that the allocation of this site would result in the LDP being unsound given the evidence provided. We proposed options recommended that either further work be undertaken or the site be deleted from the LDP. We welcomed further dialogue with the local planning authority in attempts to resolve issues.
Two planning applications have been subsequently submitted for development at this location; an application for 248 dwelling (13/1279) and an application for the temporary use of land for storage of inert material. The later application was withdrawn on 4th March 2014. Natural Resources Wales objected to the development proposed in application 13/1279 because the flood consequence assessment (Waterman Transport and Development Ltd. Dated November 2013. Ref. 13980/FCA/IIE) submitted in support of the planning application did not demonstrate that the risks and consequences of flooding could be acceptably managed. We have also reviewed an hydraulic model. We seek confirmation from you on the status of application 13/1279 and whether a decision has been issued to permit development and any conditions imposed.