ATKINS

Newport City Council
Local Development Plan
Revised Deposit Plan

Sustainability Appraisal Report

Appendices: Volume One

June 2013

Plan Design Enable

Newport Local Development Plan
Revised Deposit Plan

Sustainability Appraisal incorporating Strategic Environmental Assessment

Sustainability Appraisal Report

Appendices: Volume One

June 2013

Notice

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Appendix A - Baseline Data

A.1 Review of relevant ongoing programmes

The following outlines a series of programmes that will have a considerable influence on the future of Newport in terms of its sustainability which have been considered in more detail as part of the review of plans, policies and programmes as well as the baseline data review.

A.1.1 Energy Efficiency Programmes

Newport City Council is working with the South East Wales Energy Agency to improve the energy efficiency of all homes in the city, both private and social (source: Newport City Council).

- **Energy Efficiency Advice Centre** - The Advice Centre raises awareness of energy efficiency matters and then provides free and impartial advice to the public in Newport and the other local authorities across South East Wales on how they can reduce their energy consumption.
- **Healthy Homes** – This project aims to combat poor health caused through inadequately heated homes. Newport and Merthyr Tydfil councils are the lead partners with the scheme now having been taken up by four other councils. Heath professionals along with allied staff in local authorities and the voluntary sector are trained to identify problem homes and with the Advice Centre then taking the referral and finding the solution; and where possible grant funding. To assist homeowners who do not qualify for the National Assembly's Home Energy Efficiency Scheme grant or whose condition is too urgent to wait, the Advice Centre has secured £50,000 of crisis funding from Scottish Power.
- **Local Energy Support Programme** - Branded as *Energy Focus*, this programme works with Newport City Council and other Local Authorities and Housing Associations to develop strategic plans and gain corporate support for energy efficiency in order to meet their own and government targets. In Newport it delivered a climate change workshop for elected members and has made presentations on the joint work that the Agency is doing with the council at six Neighbourhood Committee meetings. It has been providing assistance with the LSVT and publishes a quarterly sustainable energy newsletter, which is sent to all elected members and senior officers.
- **EnergyWise** - This is a scheme utilising Energy Efficiency Commitment funding from several energy suppliers to provide grants to private householders and private landlords to assist with the installation of cavity wall and loft insulation. For householders in the Priority Group, being those in receipt of income or disability related benefits the work is carried out free of charge with prices to others being reduced by around 50%. In the last year, 344 householders took advantage of the scheme.
- **Cosy Homes –** This programme aims to improve the insulation standards in all of the City's social housing stock so that it meets the requirements of the Welsh Housing Quality Standard. In the first two years of the programme 5,103 homes have been improved. Initially it is concentrating on traditional build where cavity walls and lofts can be insulated but will then look at ways to improve the insulation of the more difficult "hard to treat" system built properties.
- **Sheltered Housing -** Staff visited 10 of the council's sheltered housing complexes and talked to the residents about how they could reduce their energy bills. To help with this they were also given two energy saving lightbulbs.
- **Energy Kids –** The programme aims to educate children on sustainable energy matters. Through a programme of school visits the Advice Centre is working with the 42 primary schools in Newport and last year made 28 presentations with the remainder being completed in 2007/8. As well as the

educational aspect it has also lifted many families out of Fuel Poverty as through a Home Energy Check, which pupils complete for homework and the subsequent information pack received by parents, low income families are made aware of the free heating and insulation measures available through the Assembly's Home Energy Efficiency Scheme.

- **Affordable Warmth -** The Advice Centre is working with Newport City Council to develop and Affordable Warmth Strategy to help eradicate fuel poverty by linking the activities of statutory, commercial and voluntary agencies. The project commenced in 2006/7 with the final document intended to be published in 2007/8.
- **Home Energy Efficiency Survey** – Over 2005/2006 the Agency carried out a postal survey to gather data relating to the energy efficiency of all private homes in the City. This data is now being used in 2007/8 to target homes that could benefit from improvement measures.
- **Partnerships** – Working with the Health Service in support of their annual Keep Well This Winter campaign and Trading Standards and the Fire Service with their Safe & Sound Roadshows. This involves attending several events in Newport advising "over 60's" households on energy efficiency measures and grants, as well as distributing free energy saving lightbulbs.

A.1.2 Woodland Access

Mentro Allen: This Sports Council for Wales-led Big Lottery funded project is encouraging hard to reach groups to take part in physical activity in their local natural environment. This project will assist with some of the aims of *Climbing Higher* regarding inclusion in sport and active recreation. This programme will work on 10 - 15 projects across Wales from 2006 to 2010. The proposed projects include a project based in Newport aims to increase participation in physical activity for black and ethnic minority groups in a range of public green space and other areas including Bettws Woods and Wentwood Forest, with the emphasis on the social benefits of this activity.

A.1.3 Waste

Newport City Council launched its city wide Rethink Rubbish public awareness campaign in July 2002. This campaign is based on the National Rethink Rubbish brand and supports both the Council's and Newport Wastesaver's initiatives. Since the launch of the campaign there has been a marked increase in the level of recycling in Newport. Recent research shows that 65% of citizen panel members have heard of the Rethink Rubbish Campaign. The council will continue to develop and promote initiatives in order to achieve exemplar status.

In 2004-2005 it was apparent that the statutory landfill reduction target would not be achieved unless residents recycled more of their waste. It was, therefore, decided to trial a scheme whereby approximately 9,000 homes would have their refuse collected fortnightly. At the same time all houses were given weekly Newport Wastesaver collections.

In terms of increasing recycling the scheme has been especially successful, generating between 38-44% extra recycling monthly for Newport Wastesavers, an equivalent throughout the City of a 5% increase on the Council's current recycling rate of 25% in 2004- 2005.

Introduction of the scheme has revealed that not all people are prepared to recycle, some increased illegal deposit of waste occurred, although this was generally of mixed waste whereby had the householder undertaken the recycling, there would have been room for their waste. Some adverse publicity also occurred, which on investigation of headline cases, was due to non-recycling of plastic bottles, aluminium cans or paper. Had the materials been

recycled, space for waste would have been within the bin. In view of the significant increases in recycling and public support, it is recommended that the scheme be extended to the entire City except initially those places with communal bin stores where recycling capacity is limited.

Strategy for Alleviating Flood Risk along the River Usk East Bank

The Strategy, recommended by Environment Agency Wales, is based upon the whole scale raising of the UDP allocated sites along the East Bank through the importation of clean inert fill material. This may also provide a suitable 'cap' on any contaminated sites, thereby making them suitable, depending on the proposed housing type, for a residential use. Formal flood defence walls (set to a minimum height of 9.15mAOD) will be constructed, where land behind existing development is too narrow to allow levels to be effectively raised. These walls will tie into the higher ground formed on the development sites. The TAN15 Flood Risk Zone map for this area is provided in Figure A.11 in the baseline description.

A.1.4 Newport Unlimited

In March 2003, Newport City Council along with the Welsh Assembly Government formed the Newport Unlimited partnership. Its remit is to take forward key aspects of regeneration and shaping of the city, enabling it to develop into a thriving centre for business, leisure and living. Across the city there are now many visible signs of the extensive programme of regeneration. Experian Business Strategies recently identified Newport as one of the top ten business growth locations in the UK.

The regeneration programme has already delivered significant redevelopment with many major schemes now complete, underway or in the planning stage. These include improvements to the railway station, a landmark foot and cycle bridge, redevelopment of the Kingsway shopping centre and work on the new £200 million retail led city centre redevelopment called Friars Walk. A third major shopping centre and residential mixed development is also planned known as City Spires. Work is now underway on the new city centre university campus, which will be a key feature of the regenerated riverfront area.

The scale and ambition of the regeneration programme is considerable.

A.1.5 Sustainability Appraisal Criteria: Newport Unitary Development Plan 2nd Proposed Changes

The Newport Unitary Development Plan is the current land use planning document in the county borough. This will be replaced with the forthcoming LDP, which this SA seeks to assess. Similar to this process then, the UDP also undertook as process of Sustainability Appraisal, using sustainability criteria. These previous criteria were drawn solely from a review of relevant plans and programmes forming the International, National and Local context for the Sustainable Development of Newport. The table below integrates the Sustainability Criteria used to assess the Newport Unitary Development Plan 2nd Proposed Changes with the addition of the review of additional Policies, Plans and Programmes reviewed through this SA process.

A.2 Environmental Data

Table A.1 - SEA topics: Biodiversity, Flora and Fauna, Air

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
Important Species: Coastal Levels	Numerous rare and declining species are present, including: grass vetchling (Lathyrus nissolia), hairlike pondweed (Potamogeton trichoides), dittander (Lepidium latifolium), hairy dragonfly (Brachytron pratense) and great diving-beetle (Hydrophilus piceus). Important bird species such as shelduck (Tadorna tadorna), snipe (Gallinago gallinago), grasshopper (Locustella naevia) and reed warblers (Acrocephalus scirpaceus) also occur, as do the otter and water vole (Arvicola terrestris).				Stated in main Report	**Nature Conservation SPG**
Broad Habitat Types which occur in Newport	• Broadleaved, mixed and yew woodland • Coniferous woodland • Boundary and linear features • Arable and horticulture • Improved grassland • Neutral grassland • Calcareous grassland • Acid grassland • Bracken • Dwarf shrub heath • Fen, marsh and swamp • Standing open water and canals				Stated in main Report	

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
	• Rivers and streams • Inland rock • Built up areas and gardens • Coastal and Floodplain Grazing Marsh • Supralittoral rock* • Littoral sediment* • Inshore sublittoral sediment* • *maritime broad habitat types					
Important Species: Riverine Habitats	Examples of important associated species include otter, water vole, Daubenton's bat (Myotis daubentonii), kingfisher (Alcedo atthis), marsh warbler (Acrocephalus palustris), yellow wagtail (Motacilla flava), twaite (Alosa fallax) & allis shad (Alosa alosa), bullhead (Cottus gobio) and white-clawed crayfish (Austropotamobius pallipes).				Stated in main Report	**Nature Conservation SPG**
Important Species: Neutral Grasslands	Important species associated with this habitat include burnet saxifrage (Pimpinella exceedence), pepper-saxifrage (Silaum silaus), tuberous thistle (Cirsium tuberosum) and yellow-rattle (Rhinanthus minor). Others are the skylark (Alauda arvensis), short-winged conehead cricket (Conocephalus dorsalis) which is found in coastal areas, the common blue butterfly (Polyommatus icarus), small copper butterfly (Lyceana phlaeas) and numerous bees and wasps.				Stated in main Report	**Nature Conservation SPG**

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
Important Species: Marshy Grasslands	Examples of important plant species include devil's-bit scabious (Succisa pratensis), heath spotted-orchid (Dactylorhiza 7xceeden) and southern marsh-orchid (Dactylorhiza praetermissa), meadow thistle (Cirsium dissectum), marsh lousewort (Pedicularis palustris), petty whin (Genista anglica) and ragged robin (Lychnis flos-cuculi). Other associated important species include snipe (Gallinago gallinago), common frog (Rana temporaria), marsh fritillary (Eurodryas aurinia) and small pearl-bordered fritillary (Boloria selene), narrow-bordered bee-hawkmoth (Hemaris tityus), slender ground-hopper (Tetrix subulata) and Cheilosia chrysocoma (a hoverfly)				Stated in main Report	**Nature Conservation SPG**
SACs, SPAs and Ramsar Sites (internationally designated sites)	**The River Usk** The River Usk is a SAC under the EC Habitats Directive; recent minor additions have been designated as SAC. The section within Newport City Council falls within the River Usk (Lower Usk) SSSI. The River Usk comprises a large, linear ecosystem that acts as an important wildlife corridor, an essential migration route and a key breeding area for many nationally and internationally important species, namely; sea lamprey, brook lamprey river				Stated in main Report	**Nature Conservation SPG** **http://www.severnestuary.net/sep/pdfs/sephabitatsandspecies.pdf**

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
	lamprey, twaite shad, Atlantic salmon, and bullhead. Water quality and quantity are considered favourable for these species. The Usk is of special interest as a fine example of a river running over sandstone geology and for its associated plant and animal communities. Its character spans a wide range of types from upland, base-poor stream to major mesotrophic Lowland River with extensive tidal reaches. The Usk is one of the largest rivers in Wales, extending over 120km from its source on Mynydd Ddu on the Carmarthenshire-Powys border to its confluence with the Severn estuary south of Newport. Only a short section of the Lower Usk (approximately 22km), falls within the City of Newport but this does include the confluence with the Severn Estuary. **The Severn Estuary** The range of habitats represented includes intertidal mudflats, sand banks, rocky platforms and saltmarsh, as well as sea cliffs and coastal grasslands. Large beds of eel-grass (Zostera spp.) and tubeworm (Riftia pachyptia) reefs occur offshore, along with a wide range of benthic communities. The international significance of the Severn Estuary is recognised through its designation as a Ramsar Site and as a SPA, due to the habitats within the					

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
	estuary and the communities of birds supported within these habitats. The estuary is also identified as a SAC; this designation covers the whole marine environment, not just the coastal strip. The River Usk comprises a large, linear ecosystem that acts as an important wildlife corridor, an essential migration route and a key breeding area for many nationally and internationally important species, namely; sea lamprey, brook lamprey river lamprey, twaite shad, Atlantic salmon, and bullhead. The Severn Estuary is an important wintering ground for a range of migratory wildfowl and waders, being a vital link of bird migration that stretches from Siberia to Africa. Birds come to the estuary both to over-winter and while on passage to and from their final wintering grounds. Key species of international significance include European white-fronted goose, bewick's swan, shelduck, dunlin and redshank. Migratory fish species include salmon, sea trout, river and sea lamprey and twaite and allis shad, NCC is a member of the Association of Severn Estuary Relevant Authorities (ASERA), which has been established to prepare a management scheme for the SAC in accordance with statutory requirements.					

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
SSSIs (nationally designated)	The city contains 11 SSSIs, either wholly or in part: **The River Usk SSSI (refer also to section above)** All of the area of the River Usk that falls within the city lies within the River Usk (Lower Usk) SSSI (this SSSI also extends well out of the city to the north-east). **The Severn Estuary (refer also to section above)** The seaward boundary of the City lies adjacent to a section of the Severn Estuary SSSI. **The Gwent Levels** The Gwent Levels comprise the single largest and most important of the nationally designated sites in the city area. The Gwent Levels are in fact designated in six separate, contiguous SSSIs, comprising (from west to east): • Rumney and Peterstone SSSI (eastern part only) • St Brides SSSI • Nash and Goldcliff SSSI[1] • Whitson SSSI • Redwick and Llandevenny SSSI (all except				Stated in main Report	**Nature Conservation SPG**

[1] Gwent Wildlife Trust and WING manage the Solutia Reserve at Great Traston Meadows (which partly falls within the Nash and Goldcliff SSSI)

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
	south-easternmost portion) • Magor and Undy SSSI (this lies adjacent to the latter, but falls outside of the NCC boundary) In total the SSSIs cover some 5,700ha, about 4,500ha of which lies within the City of Newport. The Gwent Levels lie along the whole length of the seaward edge of the City. **Penhow Woods SSSI and NNR** This SSSI comprises two areas of woodland, one of which (Coed Wen) lies completely within the city area. The City (and ancient parish) boundary bisects the second area. The area of SSSI which falls within the NCC boundary is also designated as a NNR. These areas comprise ancient semi-natural woodland on the slopes and summits of shallow limestone hills and lie on calcareous soils. The woodland comprises high forest and coppice, and contains frequent small-leaved lime (Tilia cordata). The ground flora includes nationally scarce orchids and also wild daffodil (Narcissus pseudonarcissus). **Parc Seymour Woods SSSI** This SSSI comprises an area of coppiced sessile oak (Quercus petraea) woodland on the Old Red Sandstone, and is the last substantial semi-natural relict of the formerly extensive ancient woodlands of Wentwood Forest.					

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
	Langstone-Llanmartin Meadows SSSI This comprises two small areas of unimproved wet meadow containing a wide diversity of grassland and wetland plant communities. Associated species include meadow thistle (Cirsium dissectum) and fen bedstraw (Galium uliginosum). **Plas Machen Wood SSSI** This is a small area of tall coppice woodland dominated by alder (Alnus glutinosa) on wet ground with a characteristic wet woodland ground flora.					
National Nature Reserves	Newport Wetland				Stated in main Report	
Local Nature Reserve (locally designated)	To date, one Local Nature Reserve (LNR) has been declared in the city, at Allt-yr-yn[2], on the north-western edge of Newport. A number of other sites are also under consideration.				Stated in main Report	**Nature Conservation SPG**

[2] WIND now manages only the Allt yr Yn LNR and shares management of the Solutia Reserve

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
cSINCs designated	**Rivers or Streams** **River Ebbw** Major river system supporting a range of associated habitats and species, including kingfisher *(Alcedo atthis)* and sand martin *(Riparia riparia)* **Malpas Brook** Freshwater stream used by otters **Monk's Ditch** Linear freshwater stream used by otters **Afon Llwyd** Freshwater linear stream which supports otters **Reedbeds** **Gwent Levels Wetlands Reserve** Extensive reedbed site **Ynys-Y-Fro Reservoir** Large reservoir with areas of reedbed. Identified as GOS key site for nesting and wintering wildfowl. **Pilot's Hill** Saltmarsh and brackish reed swamp **Ringland Way March** Reedswamp and marsh. Supports Cetti's warbler and reed bunting. **Greenmoor Pool** Formerly standing water which now support reedswamp. Cetti's warbler site.				Stated in main Report	**LBAP**

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
	Monmouthshire and Brecon Canal (along or near to) **Bettws Fields/Canal Fields** Semi-improved neutral grasslands, marshy grasslands and scrub along the canal. **Monmouth and Brecon Canal** Freshwater canal with adjacent bankside habitats. Otter site. **Monmouth and Brecon Canal (West)** Disused linear waterway with mosaic of adjacent habitats. Otter site. **Allt-yr-Yn** Extensive mosaic of ancient semi-natural woodlands, scrub, semi-improved neutral grasslands, marshy grasslands, hedges, etc. **Gwasted Mawr** Marshy grassland containing ponds with good dragonfly fauna and other local invertebrates. Otter spraints have been recorded. **Malpas Brook** Linear freshwater stream. Otter site.					

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
Non Statutory Nature Reserves (locally designated)	NCC sites managed under agreement by Gwent Wildlife Trust through its Newport branch, the Wildlife in Newport Group (WING). These comprise • Ringland Wood • Oaklands • Duffryn Pond • Lodge Wood • Caerleon Comprehensive School Nature Reserve, Coldbath Lane, Caerleon Where such sites also meet the criteria for SINC designation, they will be so recognised (currently there is no ongoing biological survey of the County Borough's resources and therefore it is likely that there are sites, for which at present no data is held, which would meet SINC criteria.)				Stated in main Report	
Commons	There are ten registered commons larger than 1ha in size in the Newport City Council area. Most of these are concentrated in the Gwent Levels area and include the Rivers Usk and Ebbw Foreshores, an extensive area of saltmarsh and intertidal habitats. Commons outside the Levels include the Mynydd Allt yr fach, Llandevaud and Coed y Caerau.					

<table>
<tr><th>Indicator</th><th>Quantified data (Newport)</th><th>Comparators (Quantified data for South Wales and Wales/England)</th><th>Targets</th><th>Trends</th><th>Issue identified</th><th>Source</th></tr>
<tr><td>Key Reedbed Sites</td><td>
<table>
<tr><th>Site Name</th><th>Type</th><th>Size (Ha)</th></tr>
<tr><td>Tredegar House</td><td>Lakeside</td><td>0.2</td></tr>
<tr><td>River Usk (Newport-Caerleon)</td><td>Estuarine</td><td><0.5</td></tr>
<tr><td>River Usk (Tidal pond at Grove Park)</td><td>Estuarine</td><td><0.5</td></tr>
<tr><td>River Usk (near Docks)</td><td>Estuarine</td><td><0.1</td></tr>
<tr><td>Newport Docks</td><td>Artificial</td><td><0.5</td></tr>
<tr><td>Llanwern Steelworks</td><td>Artificial</td><td><0.5</td></tr>
<tr><td>Gwent Levels Wetlands Reserve</td><td>Artificial (coastal)</td><td>57</td></tr>
<tr><td>Wentlooge Levels</td><td>Coastal</td><td>>2</td></tr>
<tr><td>River Usk/Sôr Brook Confluence</td><td>Estuarine</td><td>0.1</td></tr>
<tr><td>Liswerry</td><td>Artificial</td><td>0.1</td></tr>
<tr><td>Nash (between Monsanto and Aluminium works, Uskmouth)</td><td>Artificial</td><td>c.1</td></tr>
</table>
</td><td></td><td></td><td></td><td>Stated in main Report</td><td>Biodiversity Guide for Gwent, 2001-2005 (GGBAG) in LBAP</td></tr>
<tr><td>Priority Habitats for Newport</td><td>T1: Habitat Action Plans for Tranche 1 of Newport's LBAP
Upland mixed ashwoodsT1</td><td></td><td></td><td></td><td>Stated in main Report</td><td>LBAP</td></tr>
</table>

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
	• Wet woodland T1 • Recent semi-natural woodland and scrub (includes carr) • Planted coniferous woodland • Lowland wood pasture and parkland • Hedgerows (includes ancient and/or species rich hedgerows) • Roadside verges • Arable and horticulture (includes cereal field margins) • Improved grassland • Neutral grassland T1 • Calcareous grassland • Wet grassland (includes purple moor grass & rush pasture, and fen meadows) • Coastal and floodplain grazing marsh T1 • Acid grassland and lowland heathland • Bracken • Fens, marsh and swamp • Reedbeds T1 • Standing open water • CanalsT1 • Rivers and streams T1 • Inland rock • Gardens T1 • Parks, allotments and school grounds					

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
	• Urban (includes buildings, industrial and retail, waste and derelict ground) • Maritime cliffs and slopes (includes maritime grassland) • Coastal saltmarshT1 • Mudflats and seagrass (eelgrass) bedsT1 • Marine (includes sublittoral sands and gravels) **Reedbeds** Reedbed is one of the rarest habitats in the UK. There are relatively few large reedbeds in Gwent, the most notable ones being in Newport. An important reedbed site is the Gwent Levels Wetlands Reserve (Uskmouth), which includes both wet and drier reedbed areas. There are currently 57 ha of reedbed at the Reserve. Key reedbed sites are identified below. Several areas of reedbeds fall within wetland areas notified as Sites of Special Scientific Interest (SSSIs): Gwent Levels SSSI Complex, River Usk. In addition, the River Usk is a candidate SAC and the Severn Estuary is notified as a Wetland of International Importance under the Ramsar Convention and as an SPA under the EC Birds Directive. One of the larger reedbeds (Gwent Levels Wetlands Reserve) is owned and managed as a reserve by CCW. In addition, any sites that meet the relevant criteria (whether habitat or for associated species) will be					

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
	identified as Sites of Importance for Nature Conservation (SINCs). Five sites have been identified by Newport City Council as cSINCs for their importance as reedbeds, and are identified below. **Monmouthshire and Brecon Canal** Newport City Council has identified six cSINCs along or near to the canal, details of which are identified below. **Coastal Levels** Levels habitats occur along the entire southern edge of the city, extending for a distance of some 18.5km and encompassing an area of about 5000ha within the city area, about 4500ha of which lies within SSSIs. Important species are outlined in below. **Mudflats** Mudflats in Newport extend for approximately 20 km along the Bristol Channel, and up into the Usk Estuary. The Severn Estuary is one of the largest in Britain and Europe and possesses the second largest tidal range in the world. Mudflats have a low biodiversity but are characterised by high biological productivity and a large biomass. **Woodlands** Woodland is very well represented in the city, a					

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
	high proportion of which is semi-natural broadleaved and much of which is ancient woodland (woodlands which have been in existence since 1600). These include about 15 larger sites (greater than 10ha), and a very large number (in excess of 500) of smaller woodlands (less than 10ha). Many of these (except those smaller than 2ha) have been included in the county Ancient Woodland Inventory (Walker & Buckley 1989). In addition, there are about half a dozen large plantation woodlands. Most of the larger woodlands (those in excess of 25ha) in the city are dominated by conifers grown for timber, and are generally considered to be of lesser nature conservation value than seminatural woodland. However, large conifer plantations may themselves have some intrinsic value, supporting specialised birds such as crossbill (Loxia curvirostra) or nightjar (Caprimulgus europaeus). **Parklands** There are also at least nine historic parks in the city area, but only about half of these support large old trees and/or are likely to be medieval or earlier in origin. Medieval deer parks were often created from ancient woodlands and continue to support populations of characteristic plants, lichens and invertebrates, especially those associated with very large, dead or moribund trees (Harding & Rose					

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
	1986; Alexander 1999). **Wet Woodland** • Key Wet Woodland sites in Newport are: • Plas Machen (3ha) (SSSI) • Stabrick Works (10ha) (site is shared with Torfaen County Borough Council) • Llwyni Wood (0.5ha) • Coldra Wood (1.5ha) • Mescoed Mawr (1.5ha) **Riverine Habitats** The River Usk is a very important habitat in the city, recognised by its high level of statutory protection (see above). However, the city also contains a number of other major rivers and streams, including the Afon Ebbw, a section of the Afon Rhymni and various tributaries of the Usk. The Monmouthshire and Brecon Canal also forms an important waterway in the city. These waterways are especially important as linear features connecting numerous adjacent habitats along their length, including various wetlands, scrub communities, woodlands and marshy grasslands. There are estimated to be at least 50km of major waterways within the City outside the Gwent Levels. Important species are outlined below. **Neutral Grasslands**					

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
	There are estimated to be about 70 known semi-improved neutral grassland sites in the City, but the great majority of these have become fragmented and are small in size (no larger than approximately 5ha.). There are about half a dozen larger sites comprising small series of adjacent semi-improved fields, the largest of which measures about 20ha in extent. This huge reduction in unimproved and semi-improved neutral grasslands is typical of much of lowland Britain, although it appears to have been more severe in Newport than elsewhere in the surrounding region. Important species are outlined in below. Examples of key/high quality neutral grassland sites in Newport are: • Allt-yr-Yn (1.85ha) (LNR) • Fairfield (1.1ha) • Delbury (info unavailable) **Coastal and Floodplain Grazing Marsh** The Gwent Levels possess a mosaic of habitats including coastal and floodplain grazing marsh. Unlike other grazing marshes in the UK, there is little peat near the surface; most of the fields are improved and therefore there is little botanical interest in the fields. Drainage ditches and reens intersect the floodplain and contain important populations of submerged, floating, emergent and					

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
	bank-side plants, which encourage aquatic invertebrates. Floodplain is also found along the River Usk. In comparison with the Gwent Levels, the floodplain along the River Usk has few drainage ditches and the biodiversity interest is mostly in the fields. Key examples of floodplain grazing marsh can be found at Caerleon. **Open Water** There are about 12 large areas (5-10ha or greater) of open water, including the main dock lagoons. Most of these larger sites are either reservoirs or industrial lagoons, with ecological value for wintering and passage migrant birds, amphibians and dragonflies. There are also a number of larger ornamental and fishing lakes, which support more diverse marginal and aquatic habitats, valuable for a variety of wetland species. **Gardens** Gardens can provide a multitude of habitats for a wide range of species. They can provide food and shelter for birds, butterflies, moths, frogs, hedgehogs, and even bats and foxes. There are approximately 47,000 households (excluding flats) in Newport.					
	Key habitat resources:					

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
	Designated Sites Two sites associated with Newport have European designations as Special Protection Areas (SPAs) and Ramsar sites to conserve habitats of listed rare or vulnerable birds and regular migratory species, and / or as Special Areas of Conservation (SACs / cSACs) to conserve habitats and listed rare or vulnerable species. **The River Usk** Many rare, threatened and declining species are associated with the river, including otter (Lutra lutra), kingfisher (Alcedo atthis), sand martin (Riparia riparia), river and brook lampreys (Lampetra fluviatilis and Lampetra planeri), twaite (Alosa fallax) and allis shad (Alosa alosa). **The Severn Estuary** The estuary is internationally important for its wintering wildfowl and waders, and lies on a major migratory bird route. The estuary also supports nationally important populations of migratory fish, including the rare and declining allis shad, twaite shad and river and sea lampreys. Otters occupy many parts of the estuary. The Severn Estuary's ports are extremely important to the local and regional economy. There are major ports at Bristol (Royal Portbury and Avonmouth), Cardiff, Newport and Barry, together with a number					

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
	of smaller facilities elsewhere. Maintenance dredging is required to ensure that safe navigable depths are maintained within the port for commercial shipping - there are high siltation rates in Severn Estuary - docks and their immediate entrances require regular maintenance dredging, including Avonmouth, Portbury, Sharpness & Newport Docks. **Coastal Saltmarsh** The following Nationally Scarce species have been identified: • Marsh mallow *Althaea officinalis* (Goldcliff Pill, Wetlands Reserve) • Slender hare's-ear *Bupleurum tenuissimum* (Goldcliff Pill, Wetlands Reserve) • Bulbous Foxtail *Alopecurus bulbosus* (Goldcliff Pill, Wetlands Reserve) • Golden samphire *Inula crithmoides* (Uskmouth, Wetlands Reserve) **Threats** Land claim for agriculture and industry. Continuous threat of industrial development such as airport, barrage etc. • Erosion (estimated that UK saltmarshes are being lost through erosion at a rate of 100 ha a year) and coastal squeeze.					

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
	• Accretion. It is not sufficient to offset the rate of erosion. • Changes in coastal processes may result from sea level rise, dredging (navigational and aggregate), disposal of dredged material, coastal protection works, discharges and development. • English cordgrass. This species is a fertile strain of a hybrid between the native small cordgrass (Spartina 26aritime) and the non-native smooth cordgrass (Spartina alterniflora). English cordgrass has spread and/or been planted to stabilise mudflats around the coast. It produces a monoculture that bird species such as redshank do not favour. At some sites it thus represents a loss of their feeding habitat; however, at present in Newport it is seen as valuable. • Level of grazing. For example, intensive grazing creates a sward attractive to wintering and passage wildfowl and waders, whilst less intense grazing produces a tussocky structure, which favours breeding waders. • Pollution including nutrient enrichment and heavy metals. • Litter. It may cause physical damage through abrasion and smothering of the benthic communities. Birds may become entangled in or ingest plastic litter leading to injury or fatality.					

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
	• Physical damage from vehicles, scramble bikes, fishermen etc. • Disturbance to birds using the saltmarsh (from dog walkers, anglers, engineering works etc). • Sea level rise. • Other activities that may be identified as part of the preparation of the management scheme being produced by the Association of Severn Estuary Relevant Authorities (ASERA)* (see website, www.severnestuary.net/asera). *ASERA was formed by the relevant authorities, i.e. those organisations with local power or functions which have, or could have, an impact on a marine area. These organisations have a statutory duty to ensure that they carry out their functions to comply with the Habitats Directive. **Mudflats** **Threats** • Land reclamation for development for transport and urban infrastructure and industry (already removed 25% of Great Britain's intertidal flats). • Barrage schemes. • Dredging of Severn estuary for shipping purposes. Substrata and fauna are removed and recovery is extremely slow. • Pollution including oil, bio-accumulating chemical, heavy metals and other chemicals.					

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
	Sewage and riverine discharge can result in anoxic conditions and a decrease in diversity of fauna and flora. • Eutrophication. The presence of an extensive algal mat resulting from eutrophication reduces the biomass and diversity of the infauna but will increase numbers of grazers such as snails (Hydrobia spp.). • Angling and bait digging. Bait digging causes physical disturbance to the mudflat habitat and damage to incidental species. • Human disturbance to bird populations during feeding and roosting. • Introduction of non-native invasive species for example Spartina anglica (cord-grass). • Rising sea levels may change estuarine dynamics and sedimentation processes. • Other activities that may be identified as part of the preparation of the management scheme being produced by the ASERA (see website, www.severnestuary.net/asera and Saltmarsh HAP for more details. • **Threats- Upland Mixed Ash Woodland** • Overgrazing by deer (if present), sheep and rabbits, leading to a change in the woodland structure and an impoverished ground flora. Natural regeneration will be prevented. • Cessation of traditional management practices					

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
	such as coppicing has led to neglect. • Structural and age diversity has become much reduced. • Changes in the floral composition through the invasion of non-native species such as sycamore. • Increased ecological isolation as a result of tree / hedgerow removal. • Changes in species composition brought about by the effects of Dutch Elm disease. • invasion by introduced species, e.g. cherry laurel (Prunus laurocerasus) and grey squirrels. • Climatic change and atmospheric pollution. • Over development such as housing and industry. **Threats: Wet Woodland** • Natural succession leading to development of drier woodland communities. • Habitat loss through clearance and conversion to other land uses. • Artificial and natural changes to the hydrological regime on which the woodland depends. • Lack of appropriate management e.g. flood alleviation schemes and subsequent economic development, again leading to lack of regeneration or changes in the vegetation structure.					

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
	• Fragmentation of woods leading to increased likelihood of loss of wet wood component through development of drier woodland types • Lack of natural regeneration. • Alder diseases reduce alder populations, thus changing the composition of the wood. • Invasive species such as Japanese Knotweed and Himalayan balsam reducing the quality of sites. Particularly relevant at Starbrick Works. • Inadequate management practices due to lack of financial support, poor access to sites. • Vegetation communities are vulnerable to climatic change and atmospheric and water pollution. • Encroachment of industry into Starbrick Work's woodland. **Riverine Habitats** **Threats** • Eutrophication (nutrient enrichment) caused by the run-off of fertilisers from adjacent farmland. This problem is exacerbated by the high degree of agricultural improvement of land in intensively farmed river valleys and by the removal of riparian corridors, which can act as a buffer zone to trap run-off. • Accidental or deliberate pollution incidents, especially associated with industry and intensive					

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
	agriculture (e.g. silage effluent or sheep dip) in river valleys. Pollutants entering watercourses outside Newport's boundary may be carried downstream, so an integrated approach to pollution control is required. • Some pollutants such as pesticides and heavy metals may have a long term impact, even if they are no longer in use. • Canalisation of river and stream courses, especially in urban areas, leading to loss of riverine habitat, increased flow rates and increased risk of flooding further downstream. • Urbanisation and development in catchments generally leads to faster run-off through drains and therefore increased peak flows after heavy rainfall. This brings increased flood risk and often pollution of watercourses. • Drainage of agricultural land leading to reduced water table levels in floodplain areas with associated loss of wetland and riparian habitat. • Invasive plant species such as Japanese Knotweed, Himalayan balsam and Giant Hogweed, which rapidly colonise along river valleys and which out-compete native streamside vegetation. • Litter. It blocks the water courses and greatly increases the risk of floods. **Reedbeds**					

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
	Threats • Decline through natural succession (to woodland) and lack of, or inappropriate management, leading to accumulation of plant material, scrub encroachment and drying out. • Loss of habitat through development such as industrial, residential and infrastructure, due to tipping, and in the past, through land claim such as conversion to intensive agriculture. • Loss and deterioration due to pollution of freshwater supplies to reedbeds e.g. toxic chemicals may lead to losses of associated invertebrates, fish and amphibians (and therefore prey for key bird species); eutrophication may lead to reed death; siltation leading to possible drying out. • Loss of reedbed area due to excessive water abstraction and land drainage. • Vulnerability of remaining habitat due to small size and fragmented nature; and vulnerability of associated species dependant on the habitats due to critically small population sizes. • Recreational disturbance especially where adjacent to residential developments. • Relative sea-level rise (associated with climate change) leading to predicted loss of coastal reedbed habitat. • Spread of invasive species such as Himalayan					

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
	balsam (Impatiens glandulifera) , Japanese Knotweed (Fallopia japonica) and Giant Hogweed (Heracleum sphondylium). **Neutral Grasslands** **Threats** • Continuing agricultural improvement, including ploughing, re-seeding and applications of fertiliser and/or herbicides. • The ongoing move away from traditional hay production towards intensive silage production. • Lack of appropriate management, including over-grazing, under-grazing, cessation of grazing and irregular or inappropriate timing of mowing/hay cuts or grazing. • Loss of habitat due to developments such as housing, road schemes, mineral extraction or landfill. • Tree planting or afforestation, which is often grant-aided. • Habitat fragmentation brings increased risk of species extinctions (including key plant species) in small remnant sites. • Lack of awareness of the importance of old pastures and hay meadows among landowners and local authorities. • The belief amongst landowners that unimproved and semi-improved neutral grasslands are of					

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
	low agricultural value and the absence of sufficient targeted grants to encourage retention and management of these habitats. **Coastal and Floodplain Grazing Marsh** **Threats** All development types. • Neglect in the form of a decline in traditional management. • Pollution including eutrophication. • Changes in water level management including groundwater abstraction. The ecology of the ditch and reen will alter as a result; for example, the number of breeding waders is known to decline as a result of low water levels in spring and summer and a lack of winter flooding. • Extensive and prolonged flooding can have a detrimental impact on this habitat. • Arable farming on the Levels tends to require a lowering of water levels and potential loss of interest in the ditch system. **Monmouthshire and Brecon Canal** **Threats** • Water and sediment pollution (including eutrophication from nitrates or phosphates in run-off from sewage or fertiliser, oil, industrial, and mine water). The water quality along the stretch in Newport is classified poor by the EA					

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
	(General Quality Assessment grade E, 1998). • Rubbish dumping, fly tipping and vandalism. • Excessive abstraction in particular the mechanical removal of sediment during March, and infilling. • Stocking with fish. • Surfacing wide paths, clearing scrub and carr. • Lack of appropriate management leading to the drying out of the channel, scrub encroachment, and choking of the water surface by floating invasive waterplants such as duckweed (Lemna spp.) and water fern (Azolla filiculoides). • Use of powered boats can damage aquatic plants and disturb sensitive fauna, although in some circumstances low – moderate levels of use can increase the diversity of aquatic vegetation and help maintain an open channel. • Mowing of bankside vegetation including emergent vegetation at sensitive times of the year. Emerging froglets and toadlets use this vegetation during June and July. • High maintenance costs associated with keeping water in canals. • Conflict of users, for example fishermen, walkers, horseriders, cyclists, naturalists, and health and safety issues etc. **Gardens**					

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
	Threats • Lack of knowledge about the range of species that can be attracted to a garden, and how to attract them. • Fear of wildlife or of attracting wildlife to gardens, in particular snakes, foxes and bats. • Application of pesticides and fertilisers. These can remain in the soil and bioaccumulate through the food chain. Many pesticides and fertilisers can reach watercourses through run-off and/or leaching thus harming freshwater wildlife, and our own water supply. Beneficial invertebrates such as ladybirds, lacewings and wasps may also be destroyed. These predatory invertebrates have the potential to consume large numbers of aphids and other garden pests. The use of peat for compost and mulch destroys native bogs. • Removal of decaying material that could provide good compost whilst also acting as a food source and shelter for micro-organisms and invertebrates. • Removal of most/all vegetation through construction of patio, paving, and decking, or the addition of woodchip, pebbles, and stones. • Loss of garden space to car parking facilities such as garages and drive-ways. • Introduction of non-native, invasive species. The					

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
	wind, birds and other organisms can carry seeds and pollen long distances and have the potential to introduce them to the landscape where they can out-compete and/or breed with native species etc. • For example, Japanese Knotweed (Fallopia japonica) was originally introduced as a garden species and is now a well-established alien species • Domestic pets (particularly cats) can be a real threat to birds and small animals. It has been estimated that the British cat population could be killing at least 300 million animals and birds every year (The Mammal Society, 1997).					
Air Quality	In December 2002 Newport City Council declared seven Air Quality Management Areas (AQMA), under the provisions of Part IV of the Environment Act 1995. These are: • Glasllwch AQMA • Shaftesbury/Crindau AQMA • St Julians AQMA • Malpas Road AQMA • Caerleon Road AQMA • Royal Oak Hill AQMA • Caerleon High Street AQMA The 2011 Air Quality Progress Report proposed two further AQMAs at:				See main report	Air Quality Progress Report 2011

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
	• Caerleon Road / Chepstow Road • Malpas Road (Graig Park – Pillmawr Road) During 2010 the passive monitoring data has shown that all non M4 related AQMAs show some exceedances of the Air Quality Objective for NO2. The measures within the existing Air Quality Action Plan are therefore assumed to have not had enough impact to reduce NO2 levels to below the objective levels during 2010. There were two monitoring locations outside existing AQMAs which have show exceedances above the objective level of NO2. This includes tube NCC44 (Malpas, Montgomery Road) and NCC47 (9, Castle Street, Caerleon). We are currently undertaking further monitoring at these sites Data collected from diffusion tube monitoring during 2009 and 2010 appears to demonstrate that NO2 levels have dropped significantly in areas adjacent to the M4 between junctions 24 and 28. The introduction of the 50mph speed limit and enforcement cameras between these junctions is a plausible explanation for the marked reduction in pollutant levels. All AQMAs along the M4 are now significantly below the objective level. The area would benefit from assessment with a continuous					

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
	monitor to provide additional confidence in these findings.					

Table A.2 - Air Quality Objectives contained in the Air Quality (Wales) (Amendment) Regulations 2002

Pollutant	Concentration	Measured as	Date to be achieved by
Benzene	16.25 $\mu g/m^3$	Running annual mean	31.12.2003
	5.00 $\mu g/m^3$	Annual mean	31.12.2010
1,3-Butadiene	2.25 $\mu g/m^3$	Running annual mean	31.12.2003
Carbon monoxide	10.0 mg/m^3	Maximum daily running 8-hour mean	31.12.2003
Lead	0.5 $\mu g/m^3$	Annual mean	31.12.2004
	0.25 $\mu g/m^3$	Annual mean	31.12.2008
Nitrogen dioxide	200 $\mu g/m^3$ not to be exceeded more than 18 times a year	1-hour mean	31.12.2005
	40 $\mu g/m^3$	Annual mean	31.12.2005
Particles (PM_{10}) (gravimetric)	50 $\mu g/m^3$, not to be exceeded more than 35 times a year	24-hour mean	31.12.2004

	40 $\mu g/m^3$	Annual mean	31.12.2004
Sulphur dioxide	350 $\mu g/m^3$, not to be exceeded more than 24 times a year	1-hour mean	31.12.2004
	125 $\mu g/m^3$, not to be exceeded more than 3 times a year	24-hour mean	31.12.2004
	266 $\mu g/m^3$, not to be exceeded more than 35 times a year	15-minute mean	31.12.2005

Source: Air Quality Progress Report 2011

Figure A.1 - Severn Estuary Designations 2001

Source: Severn Estuary Strategy, 2001
Note: Since 2001, the pSAC has become a cSAC

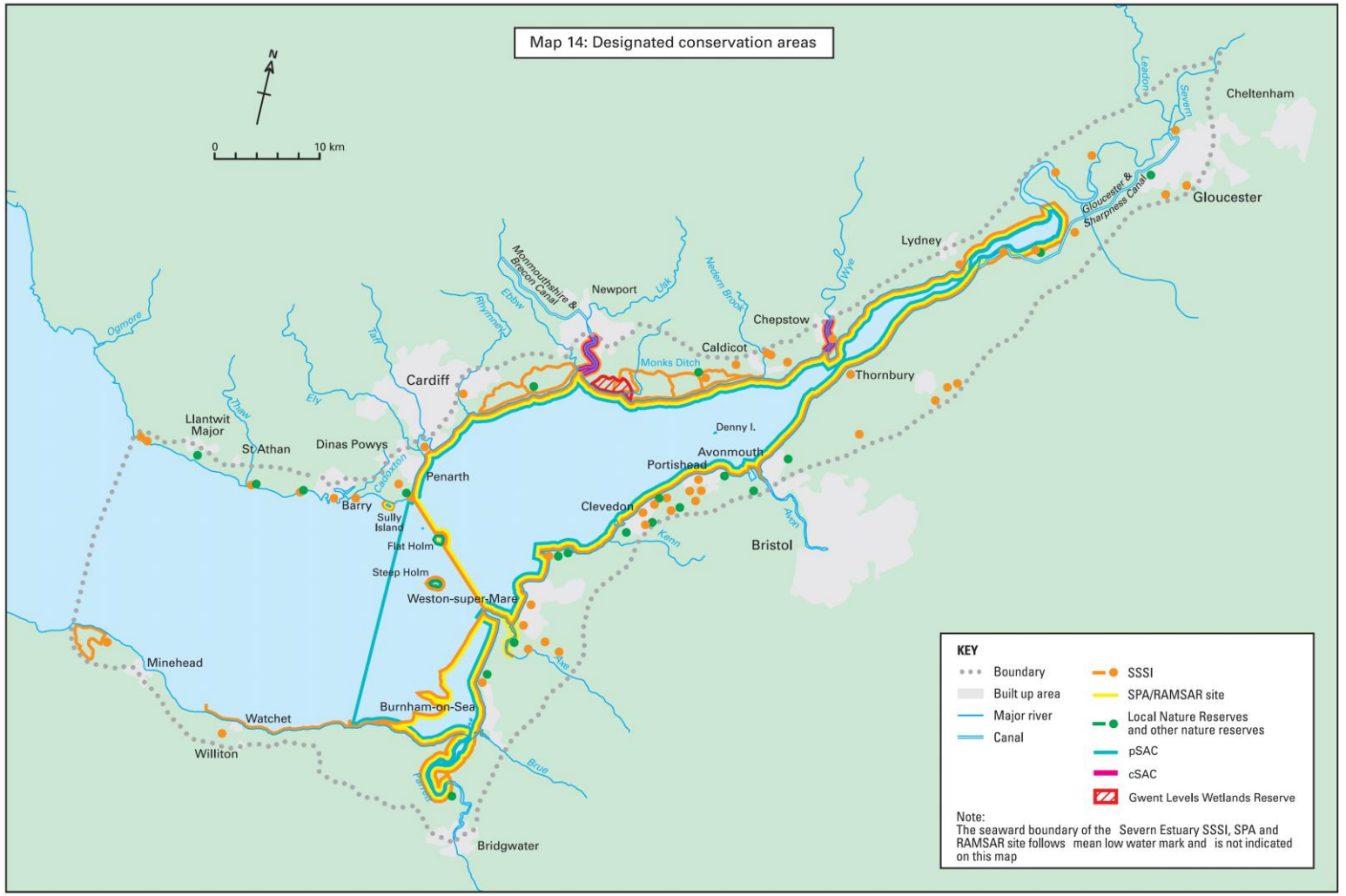


Figure A.2 – SSSI locations

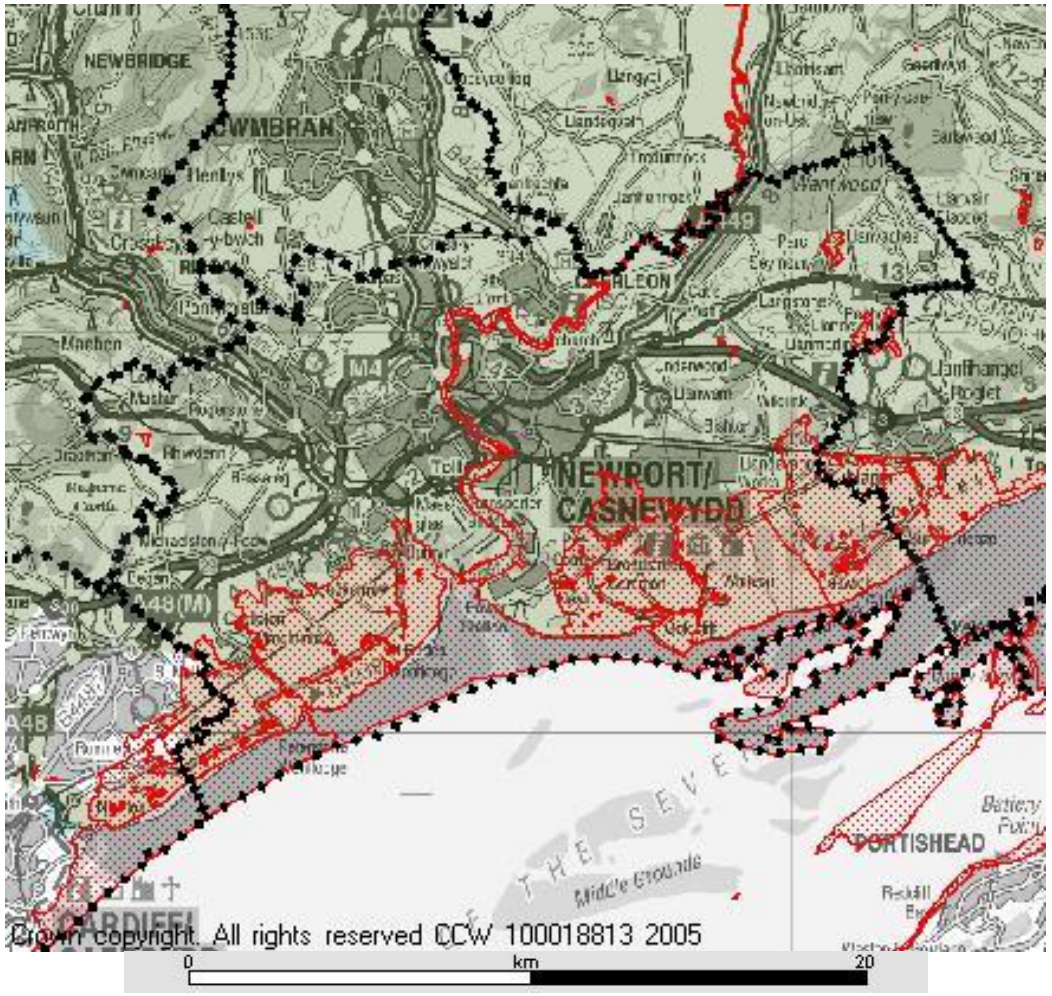
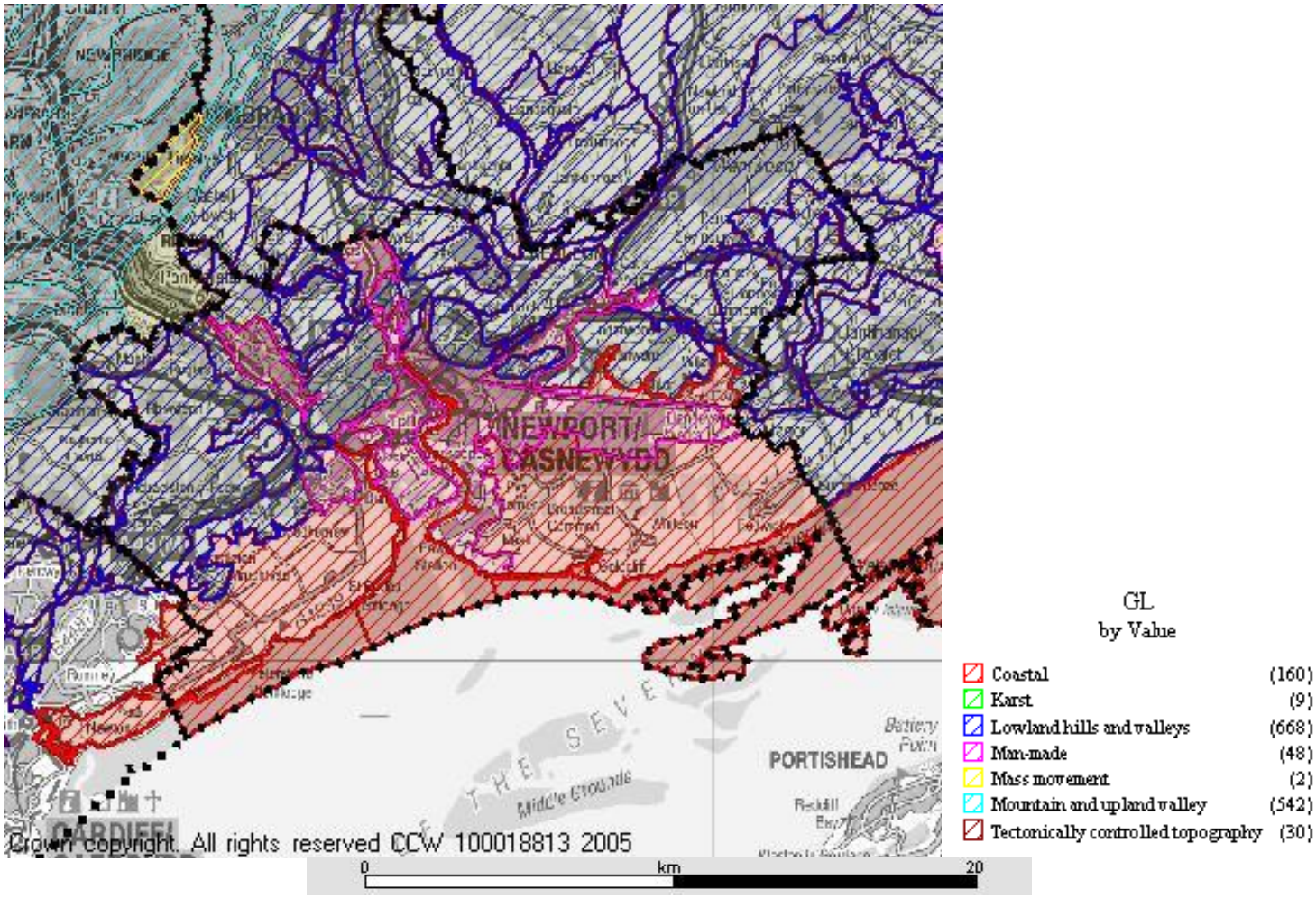


Figure A.3 - Geological Landscape



A.2.1 SEA topics: Landscape, Human Health

Newport City Council (population around 138,000) is a highly developed and urbanised part of the former County of Gwent. Countryside and rural landscape accounts for about 70% of the total land area within the local authority.

Newport is surrounded by landscapes including the Wye Valley, an Area of Outstanding Natural Beauty (AONB); the undulating Vale of Usk, famous for its salmon fishing; the Brecon Beacons National Park and Forest of Dean – both less than an hour's drive from Newport.

A key feature in the landscape is the valley of the River Usk, which effectively divides the city into two almost equal parts. Another important feature of Newport's landscape is the stark contrast between the flat, coastal plains of the Gwent levels in the south, and the higher ground and rolling hills inland to the north.

Around half of the main forest and woodlands in Newport (520 Has), the most significant being Wentwood Forest, lies within the Newport City Council boundary. The whole forest area has approximately 150km of tracks, in addition to footpaths, bridleways and green lanes. It is divided into sections that are managed by the Forestry Commission, Abbey Forestry and, more recently, a 325 Ha block purchased by the Woodland Trust. The Woodland Trust also manages a smaller 7.1 Ha site, known as Coed Wenallt, in the North-West of Newport and close to the boundary with Caerphilly County Borough Council.

Newport City Council owns and manages 25 woodlands, varying in size, and totalling some 172Ha. It is thought that informal access such as dog walking is the most popular activity throughout the majority of these woodlands.

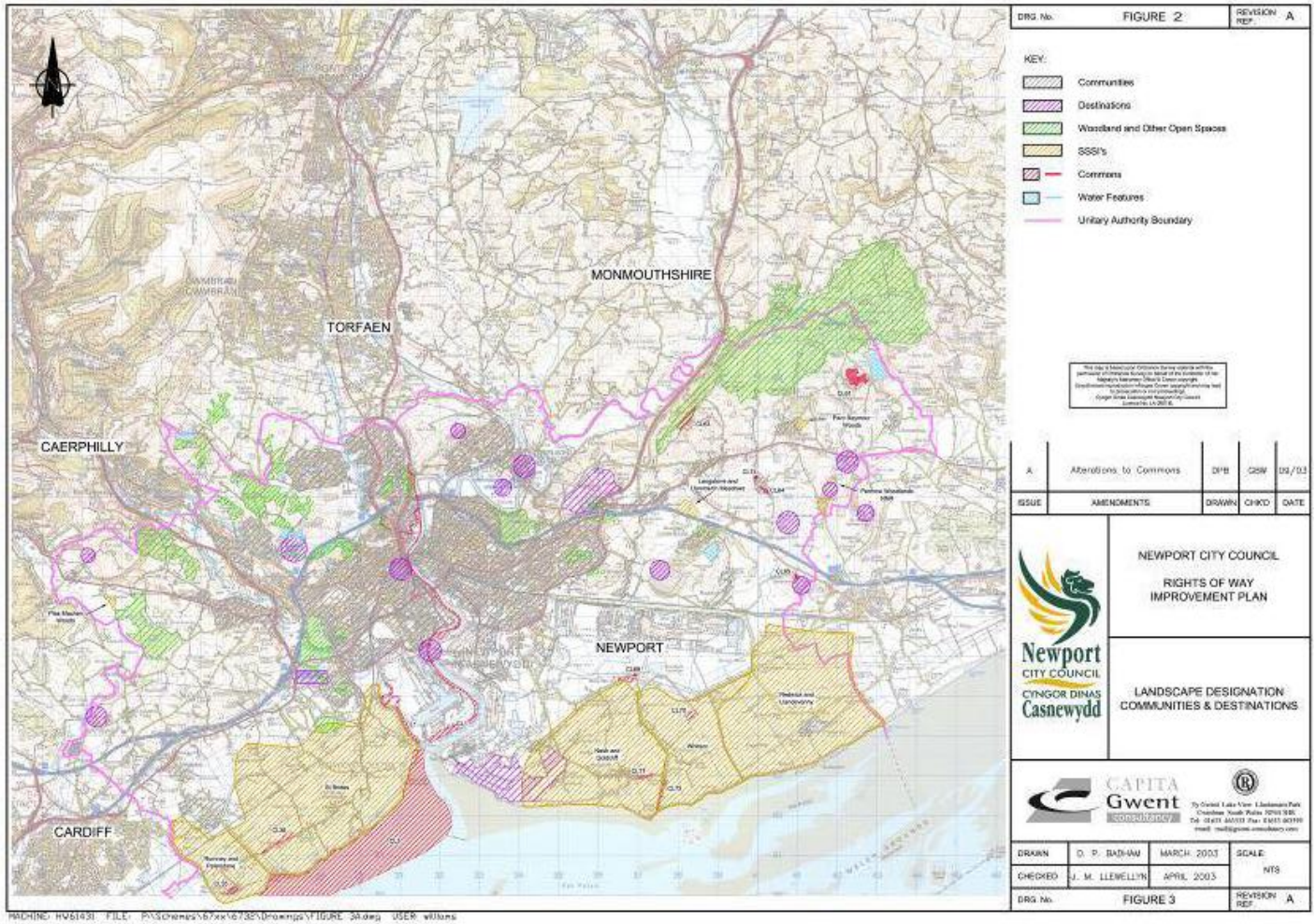
Important in understanding the landscape is the contribution of 'borrowed views' of areas outside the County Borough to the overall perception of the character and quality of the landscape. To the north, the high valley tops associated with the South Wales coalfield complex, such as Twm Barlwm, Mynydd y Lan, Mynydd Idlwyn and Mynydd Machen form a strong visual boundary. Towards the south, extensive views are afforded across the Severn Estuary towards Avonmouth and the North Somerset coast. Between these, views from within the County Borough of the urban/industrial complex of the town itself provide an indication as to the true essence of the study area.

Landscape Character Areas were identified in 'Landscapes Working for Newport Vol.1'. The 11 identified were:

- Wentlooge Levels
- Caldicot Levels
- Bishton- Llanwern
- Usk Valley
- Christchurch – Kemeys Graig Ridge
- Llanvaches
- Llandevaud- Penhow
- Allt-yr-yn – Coed Mawr
- Western Rural Newport
- Northern Rural Newport

- Tredegar Park

Figure A.4 – Landscape Designations



From the Landscape Strategy (1999) assessments, the following conclusions were made:

- Character Assessment Areas (CAAs) identified within the Landscape Strategy warrant designation as a Special Landscape Area within their own right.
- Of the CAAs identified, the following warrant further detailed consideration and assessment to identify landscapes within them that justify specific protection:-
  - CAA1: Wentlooge Levels
  - CAA2: Caldicot Levels
  - CAA4: Usk Valley
  - CAA5: Cristchurch- Kemeys Graig Ridge
- The appraisal also identified a number of CAAs of local importance to the Newport Landscape:
  - CAA7: Llandevaud- Penhow
  - CAA8: Allt-yr-yn/ Coed Mawr
  - CAA11: Tredegar Park

A.2.2 Threats to Landscape Character Areas (1999) are identified as:

Wentlooge Levels

- The gradual erosion of the underlying character of integrity of the area, in terms of vegetation, habitats, historic and cultural aspects eg Duffryn Phase 3, M4 relief road, Newport Southern Distributor Road;
- Inappropriate landscaping associated with new developments, which do not reflect the visual and nature conservation values of the CAA;
- Tipping: soil storage, flytipping and raising ground levels;
- Changes in agricultural practice and tenure e.g. turf stripping, amalgamation of farm units; and
- Gradual increase in ‘horsiculture’ with attendant subdivision of fields, and development of stables and outbuildings.

Caldicot Level

- The assessment matrix illustrates the importance of the individual aspects that comprise the LCA, and the assessments show a constant but improving landscape condition. Much of the area is well managed, but localised deterioration is evident and likely to continue. The main issues relating to this area are:

- Erosion of the overall integrity of the nature conservation and heritage value of the LCA through development proposals such as the M4 Relief Road, Wetland Reserve at Goldcliff;
- Changes in agricultural practice and tenure, such as turf stripping, amalgamation of farm units, increase in horsiculture; and
- Use of landscape mitigation proposals for new development which do not properly reflect the intrinsic character of the LCA eg industrial estates in South East Newport.

Bishton-Llanwern

- Notwithstanding the presence of the SSSI and important historic landscape elements, the LCA takes into account the strong influence upon topography made by the underlying geology. The other aspect areas identified underpin the landscape character and morphology. The proximity to the eastern edge of Newport also exerts strong visual influences upon the landscape.
- From the appraisal, the following issues have been identified:
- The continued pressure from development, around Newport, Langstone and Wilcrick;
- Gradual deterioration and degradation of farmed landscape with loss of landscape features such as hedgerows, small spinneys etc.
- Deterioration in the landscape quality around settlement edges, with inappropriate boundary treatments, piecemeal developments and flytipping;
- Degradation of the visual and sensory qualities of the LCA by the M4 motorway

Usk Valley

- The assessment matrix shoes a relatively wide distribution of component aspects, and the definition of the LCA is strongly influenced by the visual, natural history and cultural elements. Despite the recognised value of the LCA, the following issues have been identified:
- Pressure upon the integrity of the landscape resource due to development schemes and proposals;
- Inappropriate landscape development through items such as intensified agricultural practice and leisure facilities. Despite the often high standards of development, the resultant landscape does not reflect the pattern of the area, and is often visually prominent from the surrounding area;
- Perceived low quality of landscape by the public, which equates the exposed mudflats at low tide with unattractive landscapes; and
- General degradation of the landscape close to settlements, with poor management practice, horsiculture and flytipping.

Christchurch: Kemeys Graig Ridge

- The key to the LCA is the strong historic and cultural links with the development of the Newport landscape, together with the prominent visual characteristics, and underlying nature conservation values. The key issues relating to this area are:
- Loss of characteristic woodland flora/fauna dues to replanting of semi natural ancient woodlands;

- Loss of overall landscape character due to creation of inappropriate landscapes associated with new development proposals e.g. Celtic Manor Golf Course;
- Pressure for development, particularly around settlement edges and key road junction e.g. the Coldro;
- Loss of historical landscape integrity due to continuing development pressures and proximity to urban areas;
- Degradation of visual and sensory character by A449(T) road/ M4 motorway;
- Degradation of landscape quality around settlement fringes- flytipping, inappropriate management.

Llanvaches

- Notwithstanding the presence of a SSSI/National Nature Reserve, the primary influences in determining the extent of this LCA are the landform and vegetation patterns resulting from the underlying geology, and the important historic landscape elements.
- Within the area, the following issues have been identified:
- General degradation of landscape framework, with area being poorly managed;
- Impact of stone quarrying at Penhow Quarry;
- General degradation of historic landscape elements, particularly buried archaeology and landscape components e.g. parklands and field patterns

Llandevad-Penhow

- The LCA contains a number of aspects of moderate, i.e. 'locally important' values. This is reflected by the generality of the issues affecting the area and the historic landscape elements, similar to the rest of Newport. The main issues applying to the area are:
- Pressure for development, particularly around Langstone, with consequent degradation of settlement edge zone e.g. mixed quality boundaries and flytipping;
- Impact of M4 and A48 road corridors on visual and sensory qualities of the LCA;
- Gradual degradation of the overall landscape framework;
- Reduction in the overall integrity of historic landscape, due to development, land use changes and practices.

Allt-yr-yn Coed Mawr

- The LCA is not dominated by any particular aspect topic, and is an example of the combination of a range of locally important elements all contributing to a particular sense of place and character. The main issues pertaining to the area are:
- Pressures for development around settlement edges, and within the countryside e.g. golf courses;

- Degradation of landscape framework around settlement fringes due to items such as inappropriate boundary treatments to development sites, with mixtures of styles and materials that create a visually poor environment, together with flytipping and horsiculture;
- Landscaping of new developments, which does not reflect the underlying, wooded nature of the LCA;
- Impact of M4 on visual and sensory qualities of the LCA;
- Loss of underlying flora and fauna in ancient, semi-natural woodlands.

Western Rural Newport

- The LCA reflects its location on the western flank of the County Borough, and contains a number of influences that extend beyond the County Borough boundary. The spread of aspect area evaluations reflect this, in that they identify a 'typical' landscape of the area, with no dominant elements or features. The main issues relating to the LCA are:
- Pressure for development, particularly around settlement edges and transportation corridors;
- Loss of nature conservation value of rivers and valleys, particularly the Ebbw;
- Detraction of M4/A48 (M) and A467 road corridors from visual and sensory character of the area;
- Loss of flora and fauna associated with ancient, semi-natural woodland habitats;
- Degradation of integrity of historical landscape elements of the area, such as parklands, large estates and houses

Northern Rural Newport

- The LCA forms a distinct area on the northern edge of the County Borough with strong links to the landscape to the north, primarily in Monmouthshire. The historical and cultural landscape features are particularly concentrated around Caerleon, whereas the landform is typical of much of this part of sub-region. The main issues relating to the area are:
- The visual degradation of the landscape through urban development e.g. Lodge Farm, Caerleon, which is not readily integrated into the landscape;
- The close proximity of the LCA to the landscapes of Monmouthshire, and the need to ensure an integrated approach to their management and development;
- The visual impact of adjacent urban areas and road corridors upon the quality of the landscape. This is particularly marked in the M4 crossing of the River Usk, and the interface with the northern suburbs of Newport;
- Loss of the value of riparian habitats due to the impacts of development and loss of water quality.

Tredegar Park

- The assessment matrix shows a wide spread of aspect areas. The visual importance of the group of open spaces in relation to the entrance to Newport from the west, together with the strong historic and cultural landscape influences have led to the delineation of this LCA. The main issues relating to this includes:
- Loss of integrity of historic landscape, in particular the formal parkland around Tredegar House.
- Development pressure on urban edge sites e.g. Tredegar Park Gold Course, Duffryn.
- Visual and sensory detraction of the M4 corridor upon the landscape character of the area.
- Loss of value of riparian habitats associated with the Ebbw river;
- General degradation of the landscape due to lack of or unsympathetic managements e.g. The Gaer.

A.2.3 Historic Landscape Characterisation

(source: http://www.ggat.org.uk/cadw/historic_landscape/Gwent%20Levels/English/GL_Main.htm)

A.2.4 *"The Gwent Levels are an extensive low lying area of estuarine alluvium located on the north side of the Severn estuary in south-east Wales between Cardiff and the River Rhymney in the west and Chepstow on the River Wye in the east…*

A.2.5 *The Levels are a landscape of extraordinarily diverse environmental and archaeological potential. Although they are an important wetland resource in their own right, archaeologically the area contains a variety of landscapes of different dates, and nowhere else is it possible to make the period distinctions so easily…*

A.2.6 *Having been reclaimed from the sea at various times during the historic period, the present land surface is a supreme example of a 'hand-crafted' landscape, artificially created and entirely the work of man, preserving clear evidence of distinctive patterns of settlement, enclosure and drainage systems. However, because of recurrent phases of inundation and alluviation, there is also a proven, and quite possibly vast, potential for extensive, buried, waterlogged, archaeological and environmental deposits belonging to the earlier landscapes, which extend beyond the seawalls and banks into the intertidal mudflats. The Levels are therefore a uniquely rich archaeological and historical resource in Wales, and certainly of international importance and significance…*

A.2.7 *The present derived landscape thus comprises the following features: major reens resulting from natural watercourses; major reens which are wholly artificial; inland abandoned sea banks whose origins are obscure; sea walls probably originating in the 16th century; gouts where reens meet and coffer gouts where they cross; pills where the major reens discharge either into tidal channels or into the estuary itself; the bridges across the reens and the roadways built upon embankments; and not least the distinctive and characteristic field patterns belonging to different phases of enclosure.*

A.2.8 *In relation to the buried, archaeological landscape, Mesolithic remains have been discovered at Goldcliff, stratified in an estuarine clay underlying a sequence of peat deposits. Additionally, late Mesolithic human footprints, impressed into the lower Wentlooge Formation have been found at Uskmouth.*

Again they were preserved in estuarine clay beneath a deposit of clay. It is reasonable to suppose that other important evidence of Mesolithic activity will be found preserved further inland, and perhaps most particularly at the interface between the levels and solid geology to the north.

A.2.9 *Bronze Age activity has been recorded at various sites on desiccated raised peat beds, such as at Chapel Tump. More recently, outside the area described here, at Caldicot Castle, there is detailed evidence of palaeochannels, pile structures, a boat strake and a considerable amount of cultural material. Iron Age evidence has been discovered in the intertidal zone at Goldcliff with rectangular timber buildings, trackways and fishtraps on a shelf of fen peat. Also outside, but near the area, at Barland's Farm, Wilcrick, Roman stone and timber structures and the remains of a late 3rd century Romano-British boat have been found, alongside a buried tidal creek, emphasizing the remarkable state of preservation of archaeological material in the levels.*

A.2.10 *The Middle Ages are represented by a large number of Anglo-Norman sites including castles, moated sites, churches, mills, manor houses and court houses. There is evidence of continuity in the forms of land use between the medieval and post-medieval periods. The area saw increasing enclosure of the fields although, as late as 1830, considerable areas remained common. Whilst much of the basic network of reens had been established before this period, it continued to be developed and modified, particularly as the land became enclosed.*

A.2.11 *Over recent years, a range of spectacular archaeological sites have been excavated and, since 1987, a series of Sites of Special Scientific Interest have been notified in the Levels. The present landscape represents the latest archaeological period and provides the diverse ecological niches on which the nature conservation interests depend."*

A.2.12 Recreational Amenity: Rights of Way (PRoW)

There are approximately 300kms of PRoW within the local authority area. The table below shows that the vast majority (85%) of currently recorded PRoW in Newport hold footpath status.

Table A.3 - PRoW in Newport

Type	Number	Kilometres	Miles
Footpath	743	287	179.4
Bridleway	15	6.8	4.3
Restricted Byway	17	6	3.8
BOATS	3	0.3	0.2
All	778	300.1	187.7

Source: Newport City Council Rights of Way Improvement Plan

Table A.4 – Newport's footpaths and other rights of way which are classified as easy to use in comparison to other local authorities

	2005-2006	2004-2005	2003-2004	2002-2003	2001-2002
Blaenau Gwent	84.33	96.3	87.6	87.5	90.0
Bridgend	63.05	25.8	43.0	53.3	41.0
Caerphilly	80.46	85.0	85.0	85.0	84.0
Cardiff	66.92	52.6	37.4	34.4	26.0
Carmarthenshire	28.48	20.0	18.4	9.3	M
Ceredigion	46.47	35.6	28.8	27.3	24.6
Conwy	21.73	35.9	34.0	57.2	34.0
Denbighshire	64.16	66.9	56.0	64.5	52.0
Flintshire	67	58.0	52.7	53.3	39.0
Gwynedd	39.02	30.3	46.1	44.1	32.7
Anglesey	46.86	44.5	44.8	40.0	20.6
Merthyr	90.49	80.0	85.7	49.2	67.0
Monmouthshire	52.1	47.4	46.0	50.0	59.0
Neath Port Talbot	64.82	62.8	60.0	77.0	68.0
Newport	**61.76**	**53.7**	**59.3**	**47.1**	**39.0**
Pembrokeshire	50.46	44.7	46.3	34.0	M
Powys	37.93	35.0	55.7	46.1	20.0
Rhondda Cynon Taff	66.66	64.0	58.9	52.0	27.2
Swansea	46.37	50.7	44.0	49.8	69.7
Torfaen	47.69	49.1	49.3	37.1	39.4
Vale of Glamorgan	64.58	51.0	51.0	57.4	72.0

	2005-2006	2004-2005	2003-2004	2002-2003	2001-2002
Wrexham	34.24	39.1	42.0	31.6	25.0
Wales Average	41	51.4	47.4	43.7	46.6

Source: Newport City Council Rights of Way Improvement Plan

In addition to the Best Value Performance Indicators, a PROW survey undertaken by CCW in 2002 covering 33% of the network in Newport produced results suggesting that Newport was amongst the best in Wales from a signposted and easy to use perspective.

A.2.13 Historic Landscape

In 1996, the Gwent Levels were subject to a major landscape characterisation project funded by Cadw and Welsh Historical Monuments. As a result, and through professional archaeological consensus, the area has been place on the national Register of Landscapes, Parks and Gardens and as Historic Landscape of Outstanding Importance.

The present landscape represents human efforts to drain the salt marshes and to hold back later raises in sea-level. The present sea wall, without which the present landscape would be submerged by the sea, is probably a late medieval feature, constructed to deal with a rise in the sea-level at that period. Recent work has shown that this historic landscape is rich, not only in surviving earthworks and field patterns, but equally important in the remains of buried archaeology both in the inter-tidal zone and inland of the sea wall.

The Levels are important, therefore, for their unique combination of landform, ecological, archaeological and historic landscape interests, which the water management regime of thousands of years has both created and protected. However, and changes to the delicate interdependent environmental regime, or modern development will have an adverse effect of the internationally recognised archaeological resource. In general in October 1994 just 55% of the Wentlooge Level survived compared to their extent in the 18th Century before the expansion of Newport Docks.

A.2.14 Scheduled Ancient Monuments

Newport currently has 67 Scheduled Ancient Monuments within its boundary.

A.2.15 Listed Buildings[3]

Newport City Council has planning responsibilities for over 400 ‘listed buildings’ within its geographical boundary.

A.2.16 Conservation Areas

There are currently fifteen designated Conservation Areas within the Newport City Council area:

1. Beechwood Park

[3] A full list of listed buildings in Newport can be found at: http://www.newport.gov.uk/xpedio/groups/public/documents/web_text/n_064374.pdf

2. Belle Vue Park
3. Caerleon
4. Clytha
5. Kensington Place
6. Lower Dock Street
7. Lower Machen
8. Monmouthshire and Brecon Canal
9. Redwick
10. St Woolos
11. Stow Park
12. The Shrubbery
13. Town centre
14. Tredegar House and Grounds
15. Waterloo

A.2.17 Registered Parks and Gardens

- Beechwood Park (NP19 8AJ) is a late-19th-century urban park which has been altered very little. It consists of open areas with tree planting, woodland, terraces, recreation areas and a narrow ravine with ornamental water features. Thomas Mawson is likely to have been the designer. Current use of site: recreational / sport. This site is open to the public.
- Bellevue Park is the first public park designed by Thomas Mawson in 1893 and remains more or less intact. The park has many ornamental trees from Mawson's time and later. There is a tea pavilion with terraces and an ornamental water garden in a ravine with Pulhamite rockwork, pools and cascades. Current use of site: recreational / sport. This site is open to the public.
- Brynglas (NP20 5QU) is a large late 19th-century garden surviving in an urban area on ground sloping down to the River Usk. There is a wide terrace by the house, informal gardens with tree and shrub planting and an area of deciduous woodland with underplanting and paths, known as the 'wilderness'. The house is currently an adult training centre. This site is NOT open to public.
- Llanwern Park dates from the late 18th to early 19th century. The house and kitchen garden have gone, but the park survives in its entirety and there is a well-preserved icehouse. Current use of site: food / drink production. This site is NOT open to public.

- Machen House has a mid-19th-century garden with a well-preserved mock-Gothic structure which includes castellated boundary walls and mock turrets. Remnants of the informal garden include two naturalistic ponds. Augustus Morgan built the house and laid out the gardens between 1831 and 1835. The site included a maze garden and kitchen garden which no longer exist. Current use of site: ornamental. This site is NOT open to public.
- Pencoed Castle, Llandevaud A 16th-century raised terrace walk and enclosure survive on the south side of the ruined castle. The enclosure is surrounded by walls that were in place by the mid-18th century but are likely to be earlier. The enclosure is now pasture but has previously been orchard and shrubbery. This site is NOT open to public.
- Plas Machen has the remains of a 16th-century garden layout. There are two walled enclosures with terracing retained by massive stone walls. A further flat area is bounded by a rectangular fishpond whose size and orientation suggest that it was conceived as part of the overall design. This site is NOT open to public.
- St Woolos Cemetery (NP20 3NA) is a well-preserved landscaped garden cemetery that was opened for burial in 1854 and further extended in the late 19th and the early 20th centuries. The eastern part of the cemetery contains the original path layout and informal tree and shrub planting, mostly of evergreens. This site is open to the public.
- Parts of a grand 17th-century layout survive at Tredegar Park (NP10 8YW), although the integrity of the site has been compromised by road development. A late 18th-century landscaping phase included the creation of a sinuous lake and the removal of some formal elements such as 17th-century avenues. The gardens consisted of several compartments, one of which has recently been restored to its 18th-century layout with parterres of inorganic materials and a small mount. Current use of site: recreational / sport. This site is open to the public.

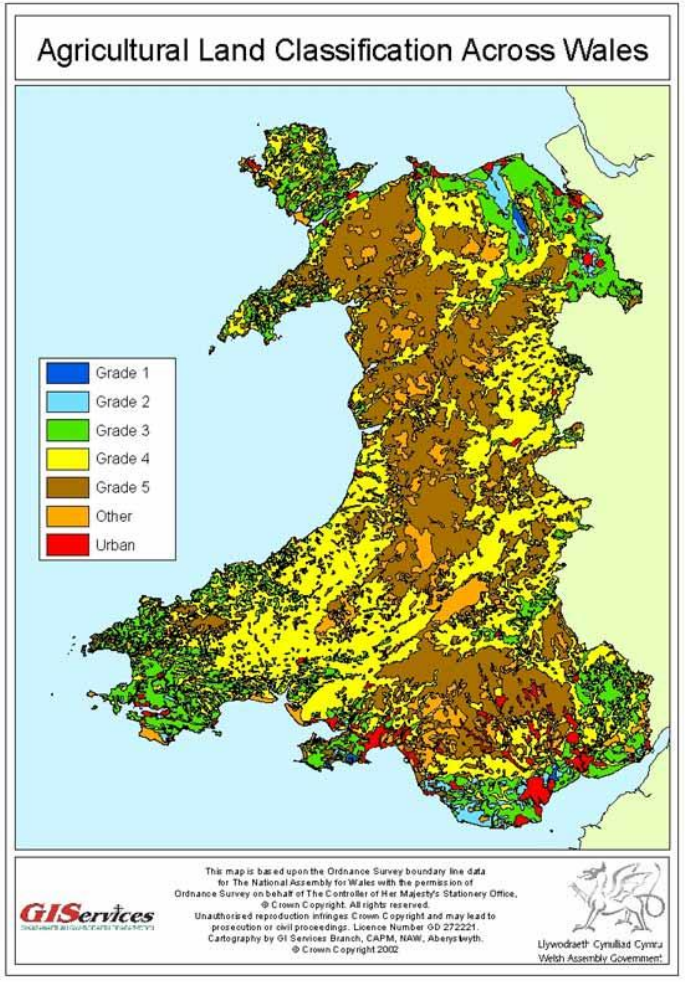
A.2.18 Landscape, Soils and Geology

There is currently an identified data gap for detailed data regarding agricultural land classification. However, the map for Wales (CCW) above indicates that the area is largely classified as 'urban'.

The landscape ranges from the high moorlands to the North West, comprising mainly of Devonian Old Red Sandstone, to the lower, gently undulating landscape of the south, which is typified by much younger fluvial deposits, underlain by Triassic mudstones.

The most extensive formation is the Devonian St. Maughans Group. This is made up of marls, sandstones, limestones and conglomerates and forms the majority of the Old Red Sandstone found in the Borough. This provides the main source of the region's aquifers. These sediments were derived under warm humid conditions. It was after this period that the Carboniferous Coal Measures that are found to the northwest were deposited. These have since played a fundamental part in South Wales' economic development.

Industry has predominantly been situated along the banks of the river Usk. The geological succession along the lower Usk is fairly uniform. The upper layers are predominantly made up of made ground to varying degrees of thickness. This tends to be thicker on the Western Banks where industry has been located for longer. Underlying the heterogeneous made ground are the soft alluvial and estuarine clays and silts. These vary in thickness and often contain layers of peat. Such layers can generate natural gas. Beneath the alluvium one can find sands and gravels, which can locally act as an aquifer. These tend to be thinner, and sometimes absent to the east of the Usk. Below, one encounters the bedrock, which is primarily Triassic/Devonian mudstones and sandstones. The old red sandstone is considered a minor aquifer. In parts it can be fractured or potentially fractured with low permeability.



A.2.19 Contaminated Land

There are several sites within the City that have been contaminated in the past, but have since had the contamination addressed and are now remediated to a standard that is suitable for use. It is likely that the majority of potentially contaminated sites will be situated in areas where industry has been heavily concentrated in the past.

A.2.20 Material Assets: Waste

Newport has achieved a 31% recycling and composting rate, which is well ahead of the Welsh Assembly target by recycling and composting almost 24,000 tonnes of waste. Over the 2006 to 2007 financial year Newport:

- recycled and composted over 13,000 tonnes at the civic amenity site and bring banks
- collected over 10,600 tonnes from its own doorsteps
- began collecting the magic figure of '1,000 tonnes a month' at the kerbside

Newport City Council has to ensure that the amount of biodegradable waste sent to landfill is no more than 75% of 1995 rates. This statutory figure is equivalent to a 40% recycling/compost achievement in 2010.

The amount of rubbish being landfilled has also fallen for a third consecutive year. The 50,000 tonnes buried in Newport during 2006-2007 is a 10,000 tonne reduction on the 60,000 tonnes buried in 2003-2004.

According to the Audit Commission in Wales (2001/2002), Newport City Council's refuse collection service was in the top 25% in terms of service performance and the bottom 25% in terms of service cost.

AEA Technology plc consultants carried out a study on municipal waste composition for the National Assembly in Wales in February 2003. The study concluded that about 46% of the overall MSW arisings in Wales could potentially be targeted for dry material recycling, and that a further 21% of the overall MSW arisings could potentially be targeted for composting.

Table A.5 - Percentage arisings of recyclable and compostable materials in the Municipal Waste Streams

	Percentage arisings of recyclable and compostable
Readily recyclable materials	38
Additional recyclables that could be	8
Compostable materials*	21
Total recyclable and compostable	67

*includes soil, garden and compostable kitchen waste excluding other putrescibles such as meat. Inclusion of other petrscilbles would increase the compostable materials to 29%

Source: Waste Management Strategy 2004

Figure A.3 - Public Rights of Way

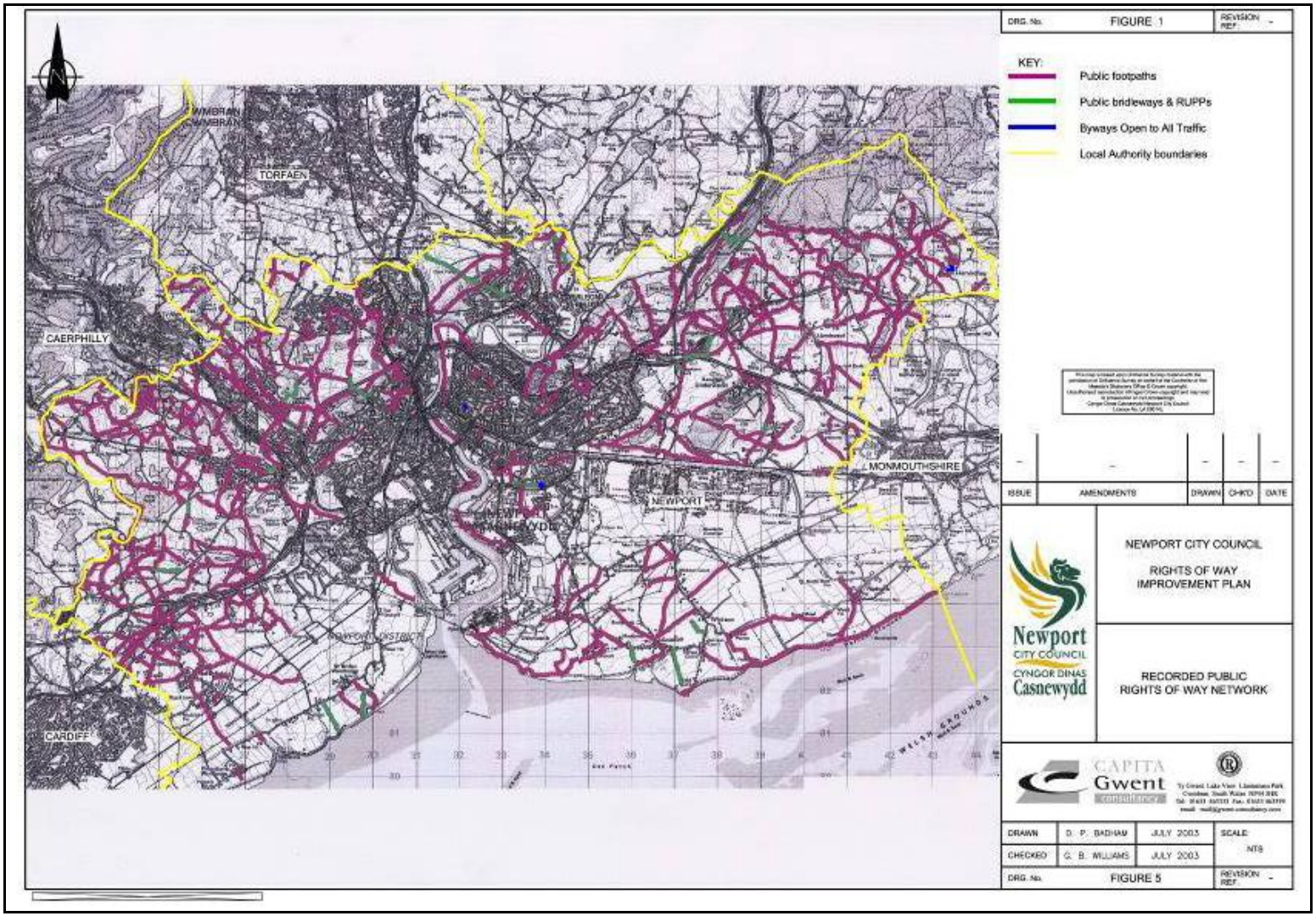


Figure A.4 – Proposed Cycle Route (Sustrans)

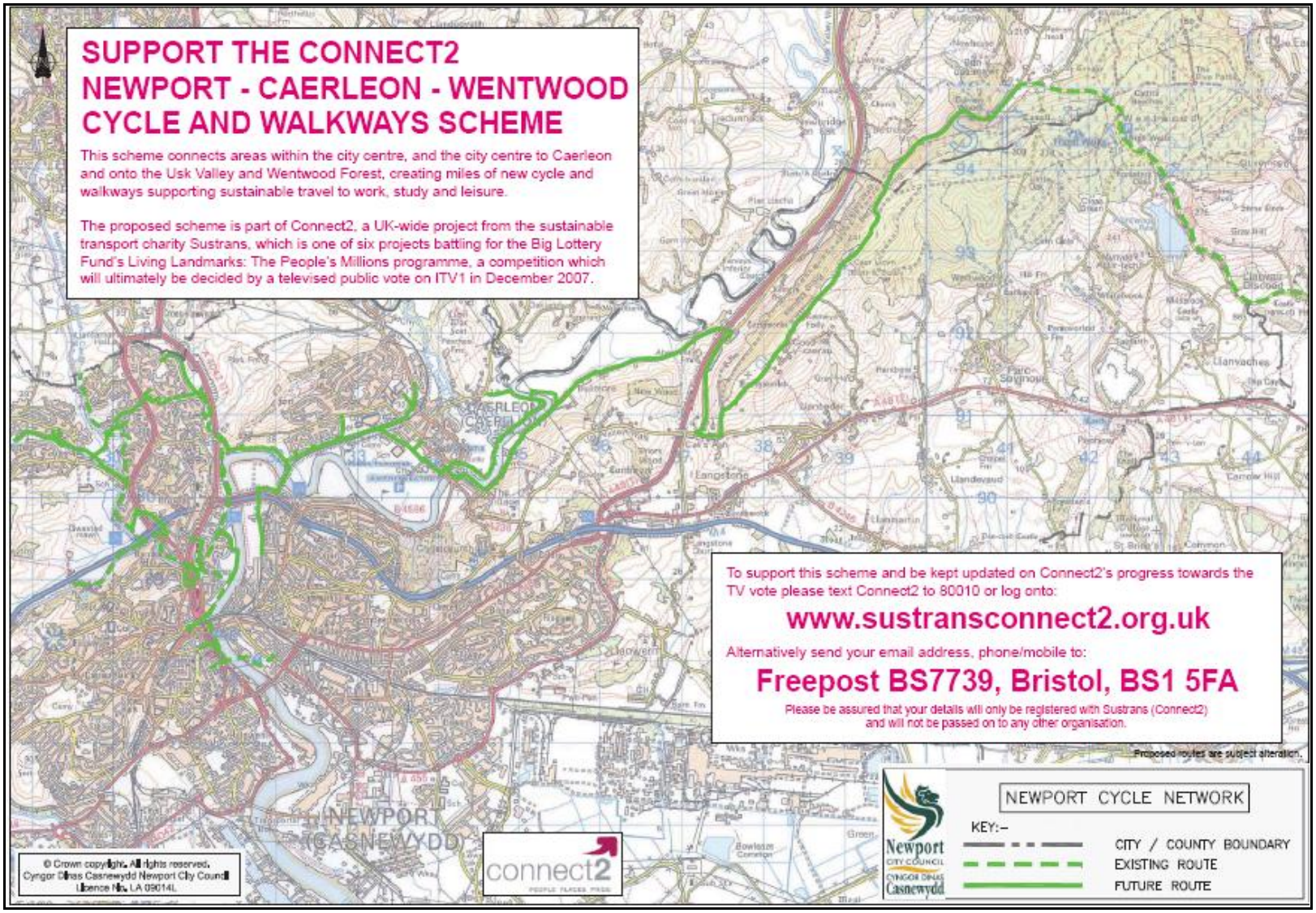


Figure A.5 – Landscape Character Areas

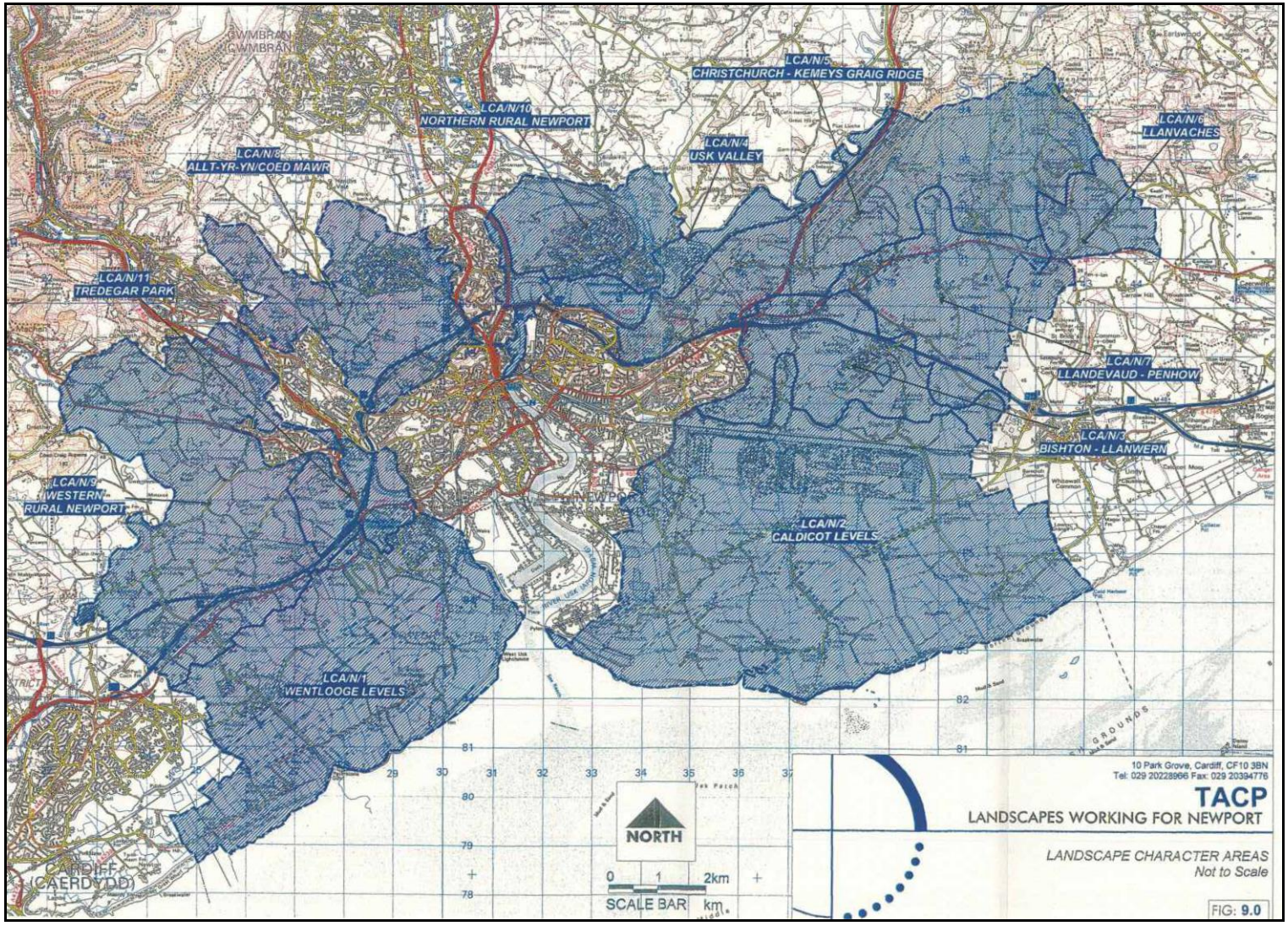
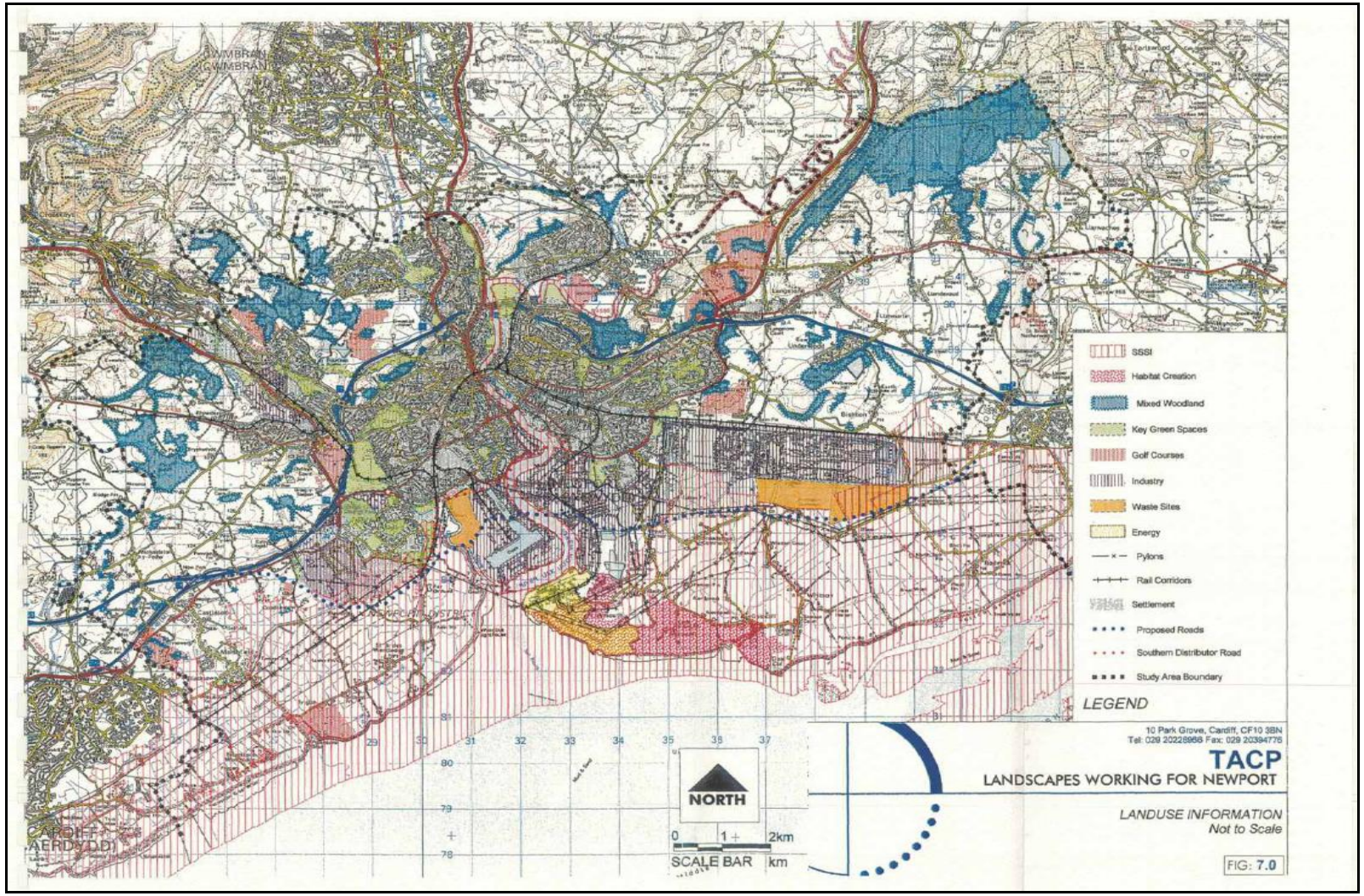
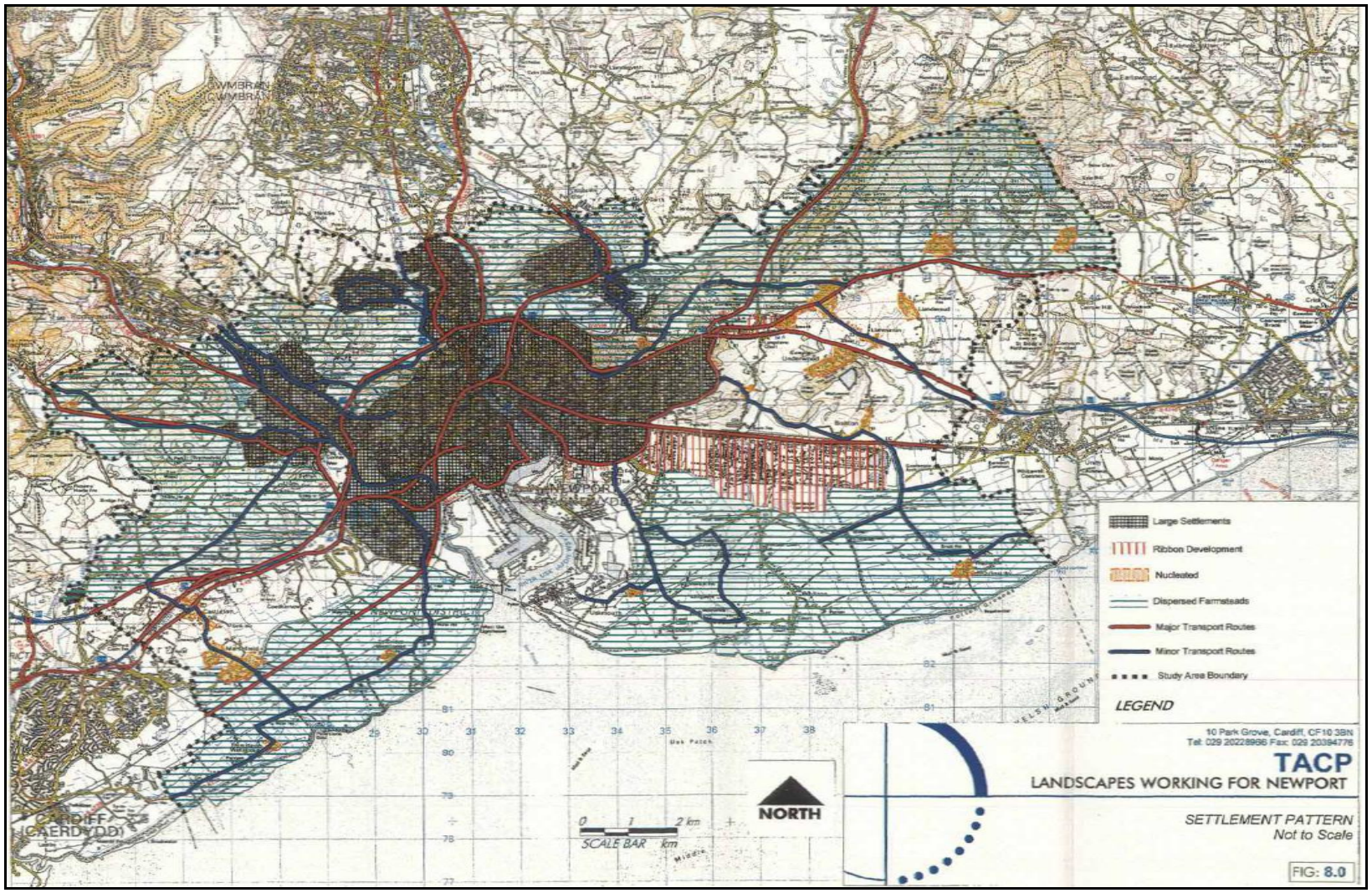


Figure A.6 - Land use Information



Source: Landscapes Working for Newport Volume 1 1999

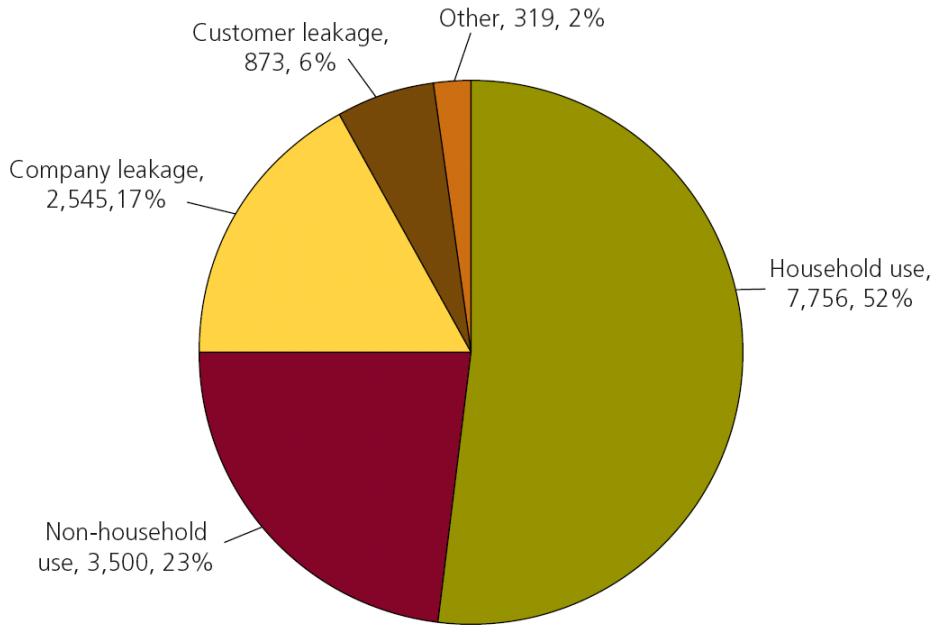
Figure A.7 – Settlement Pattern



Source: Landscapes Working for Newport Volume 1 1999

A.2.21 SEA topics: Water

Figure A.8 - Public water supply, England and Wales (megalitres (Ml) per day, and %)



Source: based on Ofwat 2007 data

Usk Catchment Abstraction Management Strategy: Overview of the existing water resource availability and the target water resource availability at low flows

WRMU name	Associated main river	Resource Availability Status				Details of the WRMU are on pages
		Individual WRMU status	Integrated WRMU status	Target status in 2013*	Target status in 2019*	
1	Sor Brook	Water Available	Water Available	Water Available	Water Available	23-25
2	River Usk	Over Licensed	Over Licensed	The Usk Habitats Directive RoC process will determine the level of abstraction where 'no adverse effect' on the integrity of the SAC can be concluded. Please see Section 4.2 for further details.		26-29
18	Bettws/Malpas Brook**	Over Licensed	Over Licensed	Over Licensed	No Water Available	30-33

* For WRMU 2, the level of abstraction determined through the Usk Habitats Directive RoC process is not a CAMS resource availability status target but a level that must be achieved in order to satisfy the Habitats Regulations.

** The name of the watercourse changes from Bettws Brook to Malpas Brook after flowing through Bettws village.

Wye Catchment Abstraction Management Strategy: Overview of the existing water resource availability and the target water resource availability at low flows

WRMU Name	Associated main river	Resource Availability Status				Details of the unit is on page
		Individual WRMU status	Integrated WRMU status	Target status in 2014	Target status in 2020	
1	Lower Wye	No water available	No water available	For the River Wye SAC and SAC tributaries the Wye Habitats Directive RoC process will determine the level of abstraction where "no adverse effect" on the integrity of the SAC can be concluded. For non SAC water courses, CAMS will be followed.		32
8	Upper Wye	No water available	No water available			36
10	Lugg	No water available	No water available			38
17	Eign Brook	No water available	No water available	No water available	No water available	42

Ebbw and Lwyd Catchment Abstraction Management Strategy: Overview of the existing water resource availability and the target water resource availability at low flows

WRMU/GWMU Name	Associated main river	Resource Availability Status				Details of the unit is on page
		Individual WRMU status	Integrated WRMU status	Target status in year 2010	Target status in year 2016	
1	Ebbw and Sirhowy	Over Abstracted	Over Abstracted	Over Abstracted	No Water Available	17
10	Lwyd	No Water Available	No Water Available	No Water Available	No Water Available	20
14	Lwyd	Over Licensed	Over Licensed	Over Licensed	No Water Available	22

Resource Availability Status Categories

Indicative resource availability status	Licence availability
Water available	Water is likely to be available at all flows including low flows. Restrictions may apply.
No water available	No water is available for further licensing at low flows. Water may be available at higher flows with appropriate restrictions.
Over-licensed	Current actual abstraction is such that no water is available at low flows. If existing licences were used to their full allocation they could cause unacceptable environmental damage at low flows. Water may be available at high flows, with appropriate restrictions.
Over-abstracted	Existing abstraction is causing unacceptable damage to the environment at low flows. Water may still be available at high flows, with appropriate restrictions.

Severn Estuary Shoreline Management Plan Review Theme Areas

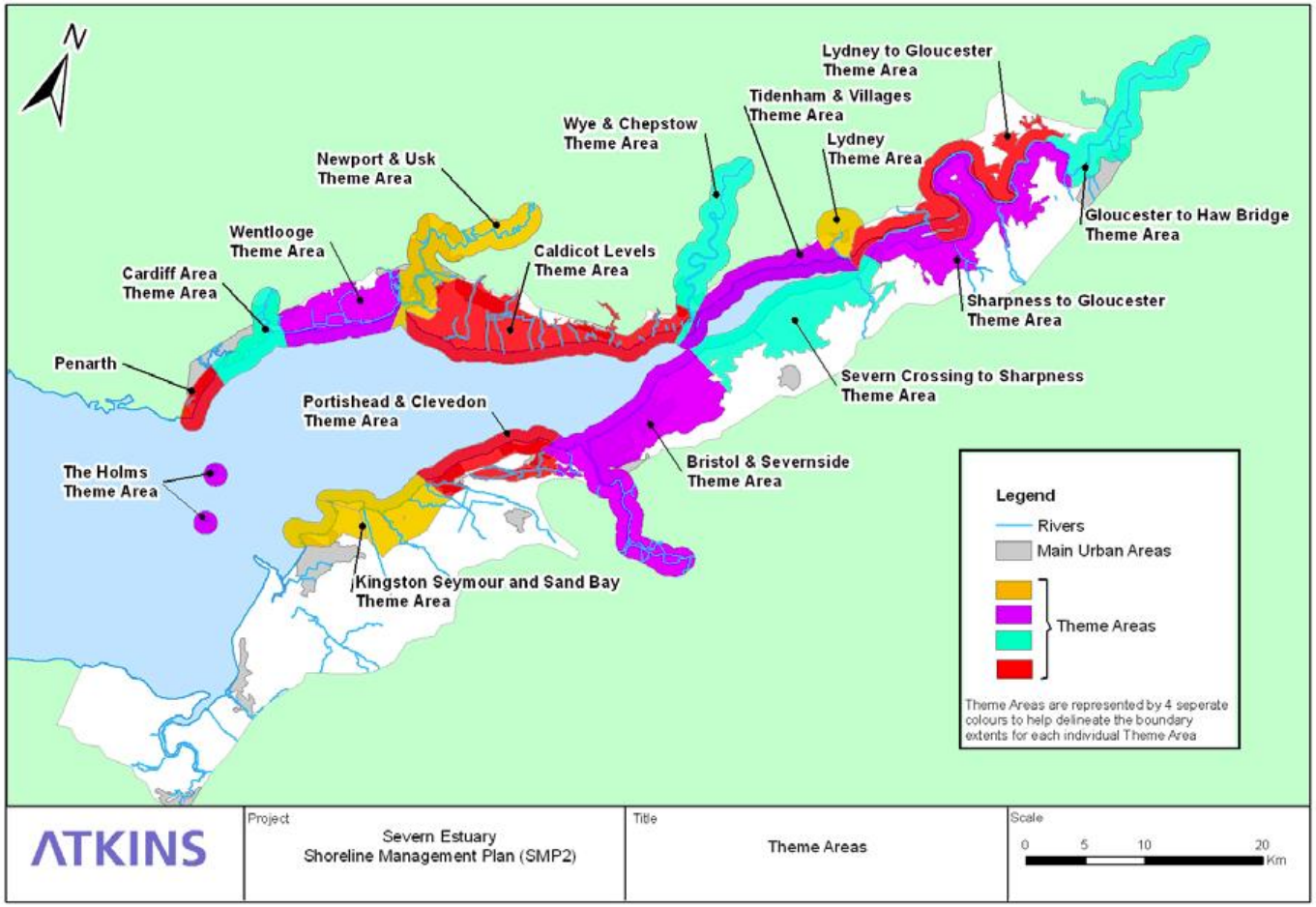
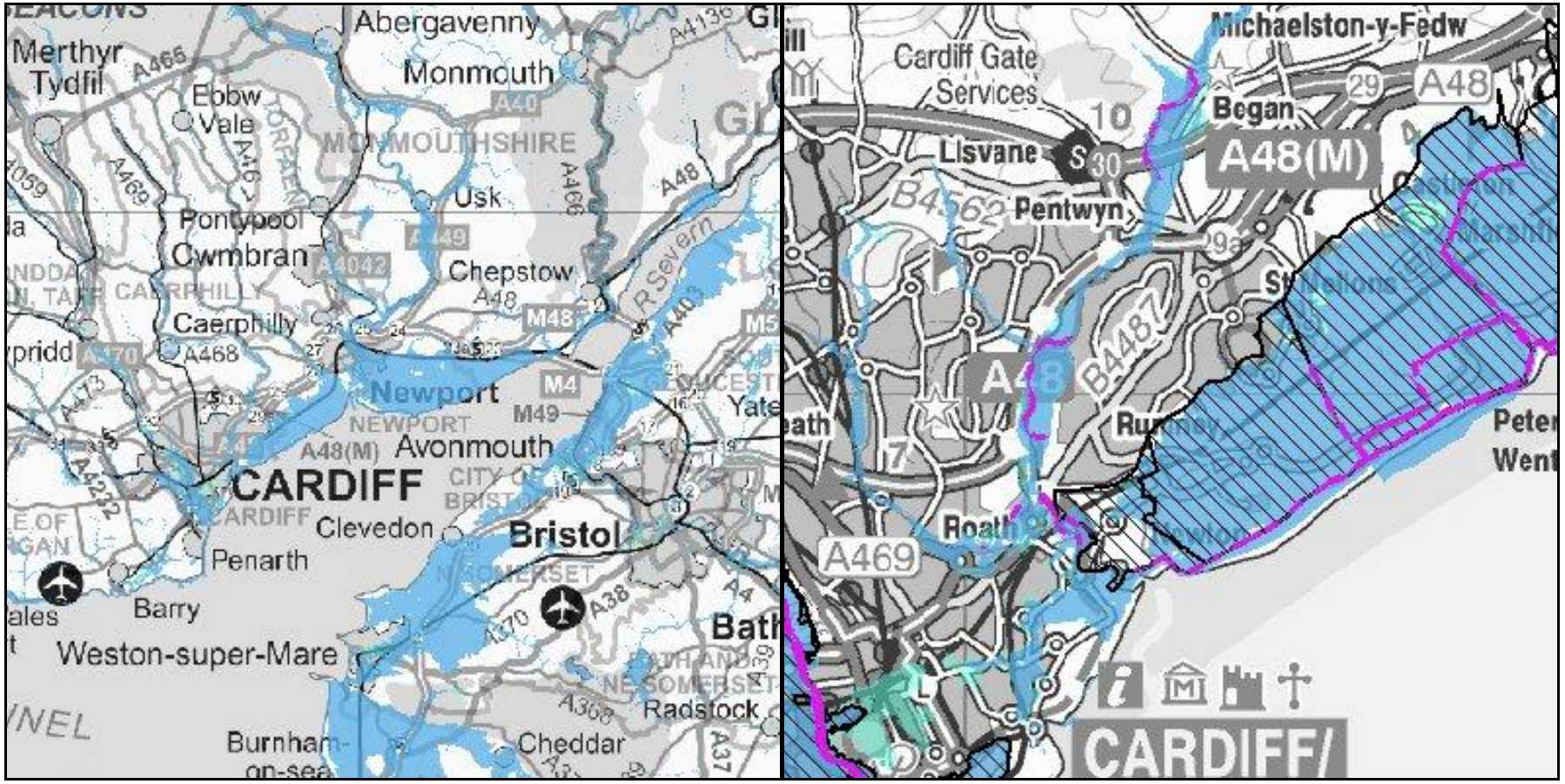
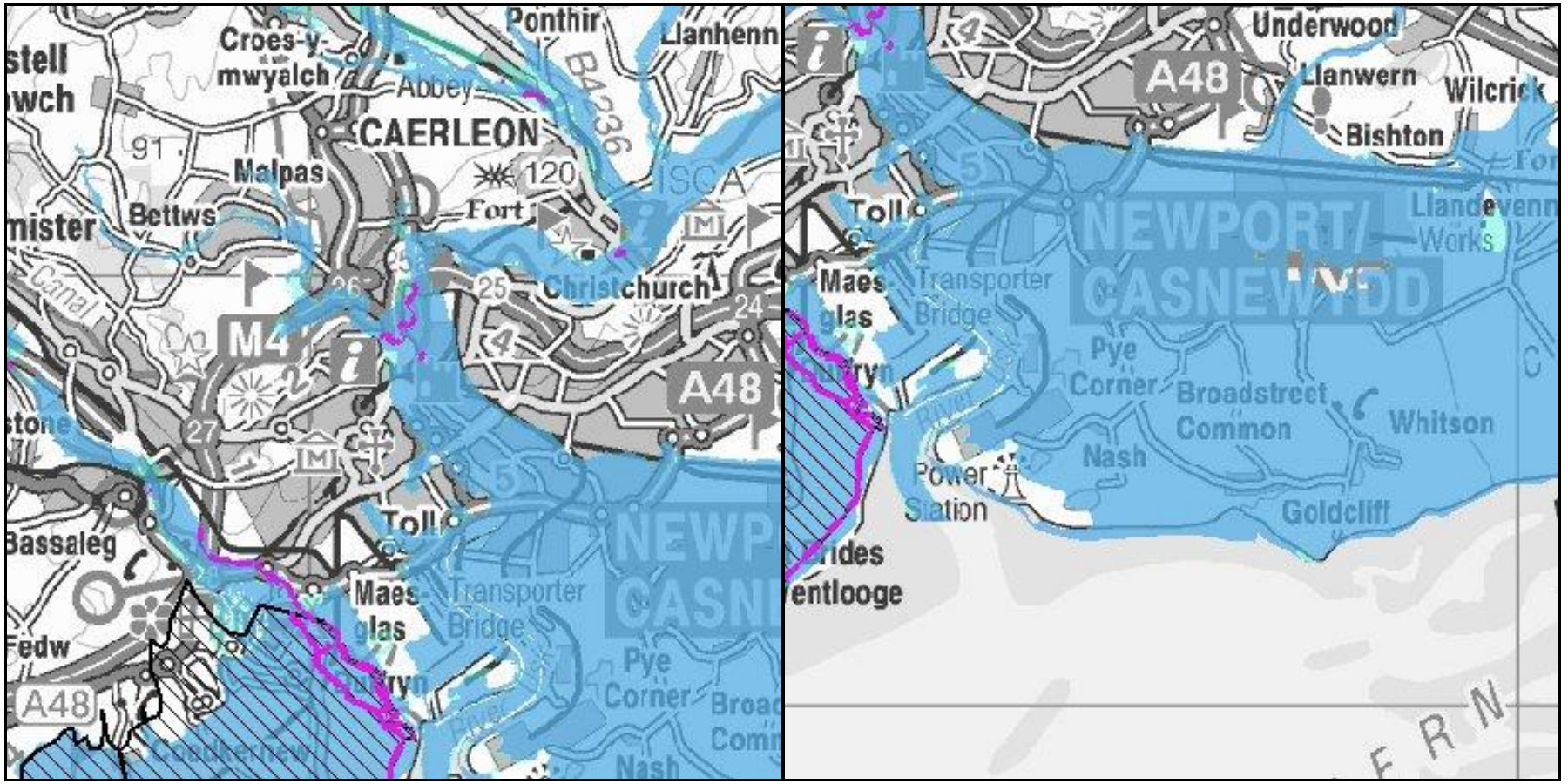


Figure A.9 - Environment Agency Flood Risk Maps

Flooding from rivers or sea without defences Extent of extreme flood Flood defences Areas benefiting from flood defences




Croes-y-mwyalch
Ponthir
Llanhenn
Abbey
CAERLEON
Malpas
Bettws
Christchurch
M4
A48
Toll
Bassaleg
Maes-glas
Transporter Bridge
Pye Corner
Nash
Underwood
Llanwern
Wilcrick
Bishton
NEWPORT/ CASNEWYDD
Llandevenn
Works
Broadstreet Common
Whitson
Power Station
Goldcliff

Llanhennock
A449
Parc
Seymour
Llanvaches
13
A48
Langstone
Penhow
Llandevaud
Cat's
Ash
22
Llanmartin
24
Underwood
A48
Llanwern
Wilcrick
Bishton
23a
23
Services
Llandevenny
Works
Magor
NEWPORT/
CASNEWYDD
Caldicot Level
Broadstreet
Common
Whitson
Redwick
Grounds
Llanvair
Discoed
Llanmelin Wood
VENTA SILV
Caerwent
ROMAN
ROAD
Highmoor Hill
Llanfihangel
Rogiet
Undy
Toll
Summerleaze

Figure A.10 - TAN15 Development Advice Map

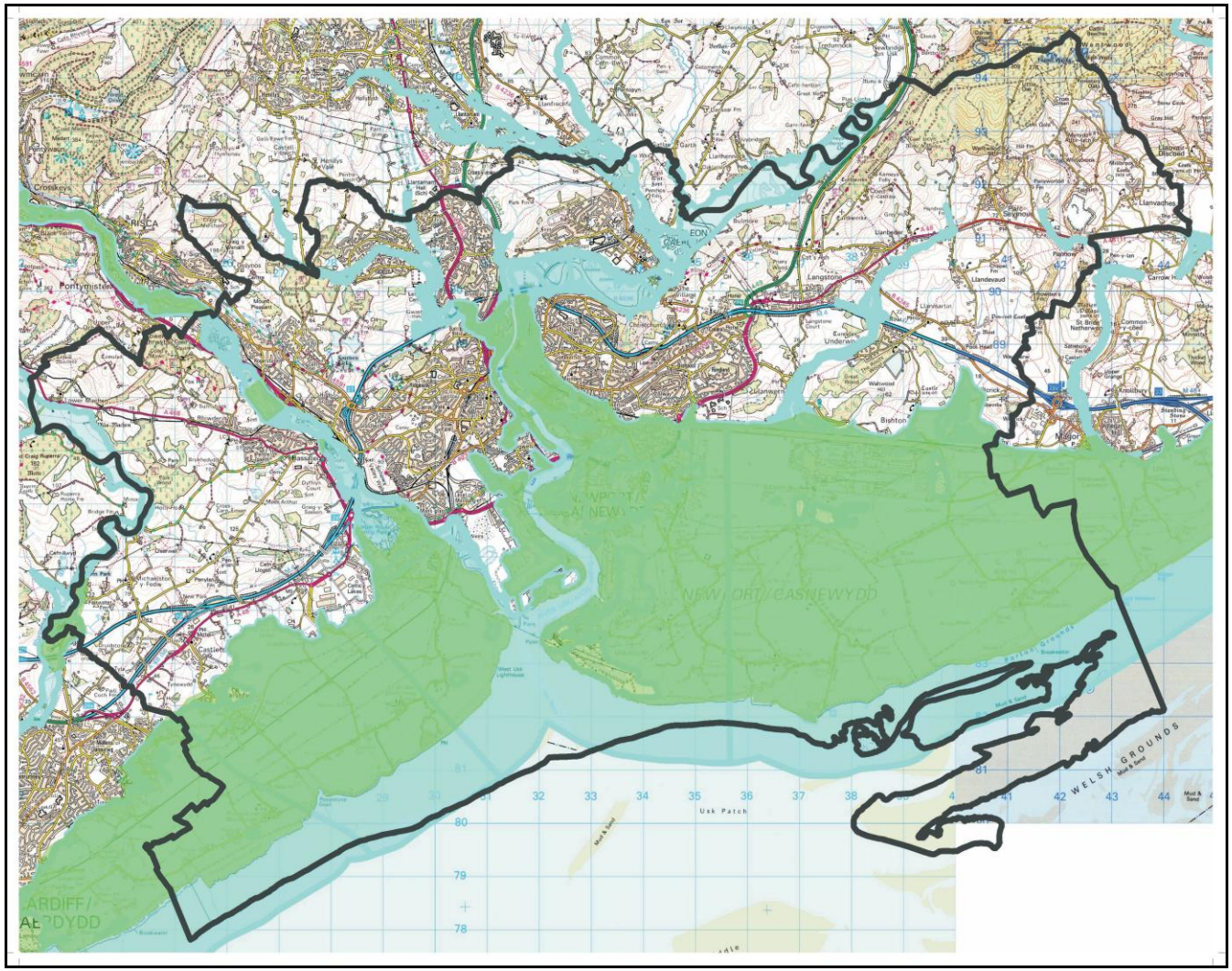
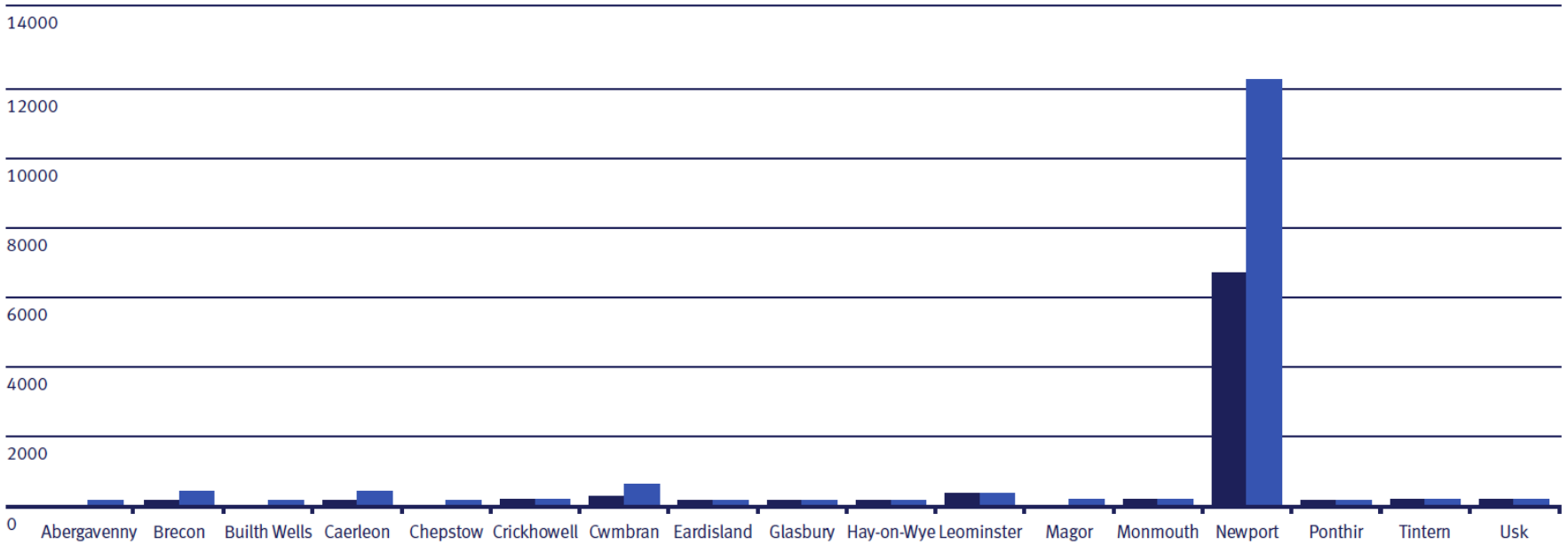


Table A.6 - Table of Flood Levels in Newport (Including Climate Change)

Flooding Frequency	Tidal
1%	8.75m
0.5%	8.84m
0.1%	9.08m

The figures in the table are based upon current information taken from the Flooding Strategy produced by Atkins, and show the various OS Levels to Ordnance Datum for different flooding return periods including climate change up to 2050.

Figure A.11 - Wye and Usk CFMP Current and future (2100) numbers of properties at risk from a 1% AEP flood event (including Newport)



A.2.22 Water: Groundwater Source Protection Zones

The Environment Agency has identified groundwater Source Protection Zones (SPZ) in the City. The total SPZ area for Newport lies to the north of the City, just to the east of Malpas.

A.2.23 SEA topics: Climatic Factors

Carbon Footprint

Table A.7 - Newport's footprint compared to other Welsh Cities

Wales	City	Planets	Footprint gha
Smallest	Newport	2.78	5.01
	Swansea	2.84	5.12
	Cardiff	2.89	5.20

Wales	City	Planets	Footprint gha
	St Davids	2.92	5.26
Largest	Bangor	2.93	5.27

A.2.24 Predicted Climate Change in Wales

Table A.8 - Wales Climate Change

Wales 2080	low emissions	high emissions
Annual mean temperature	+1.5°C	+4.0°C
Winter temperature	+1.0°C	+4.0°C
Summer temperature	+2.0°C	+3.5°C(N) +4.5°C(S)
Annual precipitation change	within normal variability	-10% (E)
Winter precipitation change	+10%	+30%
Summer precipitation change	-20%	-40% (S&E) -50% (N&W)
Average winter snowfall amount	-40 %	-100%

A.2.25 SAP rating

In 2005, the average SAP[4] rating for private sector dwellings in Newport was 51. This compares to an average SAP rating of 46 based on the findings of the 2005 EHCS, which also used SAP 2005. A SAP of less than 30 is considered unacceptably low and represents a difficult and expensive dwelling to heat. In Newport 1,920 dwellings (3.9%) had a SAP rating of less than 30, compared with the 2005 EHCS average of 11.6%.

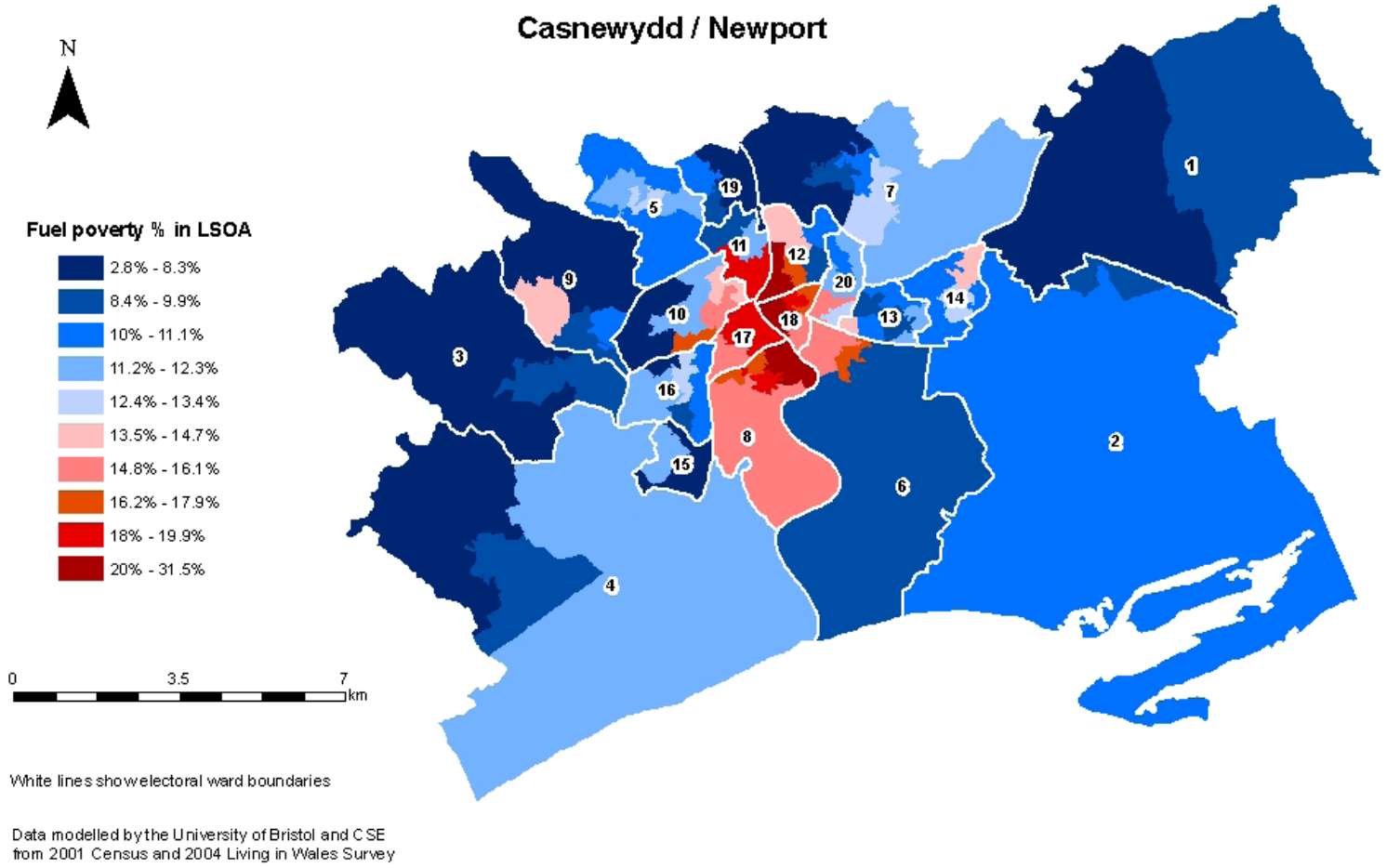
The majority of dwellings (72.2%) had a SAP rating between 31 and 59, compared with average found in the EHCS 2005 at 72.1%. There were, however, more dwellings with a SAP rating above 60 than fund in the EHCS 2005, (23.9% compared with 16.3%).

There was an estimated 4,000 (8.2%) dwellings where the household is in fuel poverty in Newport compared with approximately 11% in Wales based on the Fuel Poverty in Wales 2004 report. The cost of carrying out all works to all dwellings where the residents are not in fuel poverty but where potentially improvements could be made was £5.8 million in 2004. This represents an average expenditure of approximately £2,500 per dwelling in 2,400 properties.

It is acknowledged that this data may be out of date, and measures are being taken to try to source more recent figures.

[4] The Standard Assessment Procedure or SAP is a government rating for energy efficiency. It is expressed on a 0-100 scale The higher the number the better the energy rating for that dwelling.

Figure A.12 – Fuel Poverty Map



Source: January 2009, The Heat is On Final Report

Table A.9 - All energy efficiency measures that could be carried out

Measure	Dwellings	Percent of stock
Loft insulation	30,400	62.5%
Wall insulation	17,400	35.8%
Double glazing	6,900	14.2%
Cylinder insulation	11,800	24.3%
New boiler	12,600	25.9%
New central heating	800	1.6%
Any measures	**40,200**	**82.7%**

Table A.10 – Local and Regional Estimates Carbon Emissions by End User, Summary 2005

Local Authority and Government Office	Industry and Commercial	Domestic	Road Transport	LULUCF	Total	Population Thousands (2001)	Per capita Total CO_2 (tonnes)	Domestic per capita CO_2 (tonnes)
Region								
Blaenau Gwent	225	181	72	-5	473	70	6.8	2.6
Bridgend	825	336	277	-19	1419	129	11.0	2.6
Caerphilly	463	424	221	-4	1103	170	6.5	2.5
Cardiff	1302	712	552	6	2573	305	8.4	2.3
Carmarthenshire	799	454	528	8	1788	173	10.3	2.6
Ceredigion	243	185	245	-42	631	75	8.4	2.5
Conwy	237	299	336	-28	844	110	7.7	2.7

Local Authority and Government Office	Industry and Commercial	Domestic	Road Transport	LULUCF	Total	Population Thousands (2001)	Per capita Total CO_2 (tonnes)	Domestic per capita CO_2 (tonnes)
Denbighshire	253	249	253	-31	723	93	7.8	2.7
Flintshire	1413	387	417	5	2222	149	15.0	2.6
Gwynedd	338	309	405	-119	932	117	8.0	2.6
Isle of Anglesey	273	184	165	43	665	67	9.9	2.8
Merthyr Tydfil	160	144	116	-6	414	56	7.4	2.6
Monmouthshire	398	231	439	-8	1060	85	12.5	2.7
Neath Port Talbot	7914	357	371	-24	8618	134	64.1	2.7
Newport	**1182**	**361**	**531**	**3**	**2077**	**137**	**15.2**	**2.6**
Pembrokeshire	540	307	316	66	1228	114	10.8	2.7
Powys	425	345	561	-219	1112	126	8.8	2.7
Rhondda, Cynon, Taff	683	579	403	-31	1634	232	7.0	2.5
Swansea	728	561	406	17	1711	223	7.7	2.5
The Vale of Glamorgan	828	309	250	26	1412	119	11.8	2.6
Torfaen	351	216	113	1	680	91	7.5	2.4
Wrexham	915	323	241	-7	1473	128	11.5	2.5
TOTAL WALES	**20494**	**7451**	**7218**	**-370**	**34793**	**2903**	**12.0**	**2.6**

A.2.26 SEA topics: Soil, Landscape, Water

Table A.11– Geological Succession in the Newport Area

Geological Succession in the Newport area				
Age	**Formation**		**Thickness (metres)**	**Lithology**
Quaternary	Superficial	Marine or Estuarine Alluvium	Up to 16	Clay and peat bands overlying sands and gravels
Jurassic	Lower Lias	Lower Lias Clay Blue Lias	45 – 60	Blue grey argillaceous, shelly limestone with thin mudstone
Triassic	Rhaetic and Keuper	Cotham and Westbury Beds	5 – 7	Black shales and mudstones with thin beds of limestone and sandstone
		Mercia Mudstone Group	110 – 116	Mudstone and siltstones with thin beds of limestone
Major unconformity				
Devonian	Old Red Sandstones	Brownstones	125 – 190	Red grey sandstones and red green mudstones
		St Maughans Group	470 – 625	Marls, sandstones and limestones with thick beds of conglomerate
		Raglan Marl Group	345 – 625	Red mudstone and silty mudstone with some limestone bands

A.3 Social Baseline

A.3.1 SEA topics: Population and Human Health

The most recent actual data shows that the population of Newport has been increasing. The population has grown by 6% between 2001 and 2011. In 2011, the population of Newport was estimated at 145,736 with 51% female and 49% male. The rate of increase slowed each year between 2001/02 and 2004/05, but picked up again in 2005/06. Over the projection period, the population of Newport is projected to continually increase.

In 2004, the population was around 139,000, divided into 20 Wards, extending over 84 square miles (218km^2) the largest (by population) being Liswerry containing 7.4% of the total population. The rural area of Langstone was the smallest of the Wards with just 2% of the total population. Caerleon, the largest outlying "village" had over 8,000 inhabitants, just over 6% of the total population.

The 2006-based population projections estimate that total population of Newport is projected to increase by 19,300 (or 13.8 per cent) by mid-2031. This is below the average population growth (14.1 per cent) projected to be seen across all Welsh local authorities. The total population of Newport is projected to increase by between 2 and 3 per cent every 5 years until mid-2031.

A.3.2 Ageing Population and the dependency ratio

In Newport 48% of the residents are male and 52% female – reflecting the fact that a greater proportion of females survive beyond 60 years of age (2001). In Newport, it is projected that more growth will be seen in the male population (16.9 per cent) than in the female population (10.8 per cent) (2006-based).Of the population, 6% are under 5 and 16% are aged 65 or over. Both these groups make great use of health and social care services, yet largely make no financial contribution to the provision of services, rendering them heavily dependent on the working population.

The most recent actual data shows that expectation of life in Newport has generally seen an upward trend. This upward trend is projected to continue over the projection period, from 78.9 in 2005/06, to 82.8 in 2030/31

The number of people of working age within Newport is projected to:

- Increase between mid-2006 and mid-2026;
- Remain fairly constant between mid-2026 and mid-2031.

The number of pensioners within Newport is projected to increase continually until mid-2031, despite increases in pensionable age for both women (from 2010) and men (from 2024). The rate of increase will be highest between mid-2026 and mid-2031 (around 11 per cent). The increase in the number of pensioners is due to two factors; firstly improvements in mortality rates mean people are living longer; and secondly, the ageing on of larger cohorts, such as those born after the Second World War, often termed the 'baby boomers'.

At the start of the projection period (2006), the dependency ratio (the number of children and pensioners per 1,000 adults of working age) within Wales was around 660 per 1,000 people of working age.

The proportion of children aged 0-15 rose by 1% and the proportion of resident aged 65 and over increased by 0.4%. The largest decrease in population (4.2%) was found in the 16-29 age-band.

The number of children within Newport is projected to:

- Decrease between mid-2006 and mid-2011;
- Increase between mid-2011 and mid-2026;

- Decrease again from mid-2026 until mid-2031.

These changes are due to two factors; firstly, the difference between the number of births and the number of children turning 16 (classed as working age) in each 5-year period; and secondly migration. For each 5-year period, Newport is predicted to see a net inflow of children. The increases seen between mid-2011 and mid-2026 are a result of there being more births than children turning 16 and the net inflow of children.

The dependency ratio within Newport is projected to fluctuate between 630 and 660 (per 1,000 people of working age) over the projection period. This is affected by fluctuations in both the number of children and the number of people of pensionable age; however, the increase between mid-2026 and mid-2031 is predicted to be driven by an increase in the number of people of pensionable age, even when changes in state pension age are taken into account.

Table A.1A.2 - SEA Topics: Population, Human Health, Material Assets

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Source
Population 2001 (% of residents)	Total number: 137011 Females: 52% Males: 48%	England and Wales: 51.4(f); 48.6(m) Wales: 51.6(f); 48.4(m)			Newport City Council, Key Statistics
Population 2001 aged 0-4 (% of total pop)	6.6	England and Wales:6.0 Wales:5.8			Newport City Council, Key Statistics
Population 2001 aged 5-15 (% of total pop)	15.9	England and Wales:14.2 Wales:14.5			Newport City Council, Key Statistics
Population 2001 aged 16-29 (% of total pop)	15.9	England and Wales:17.5 Wales:16.6			Newport City Council, Key Statistics
Population 2001 aged 30-64 (% of total pop)	45.6	England and Wales:46.4 Wales:45.8			Newport City Council, Key Statistics

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Source
Population 2001 aged 65+ (% of total pop)	16.1	England and Wales:16.0 Wales:17.4			Newport City Council, Key Statistics
Early Years Education and Childcare	>90% of 3 year olds benefit from the take up of a part time education place available in a 'mixed economy' of settings (including playgroups through the medium of English and Welsh). Over 150 additional early years places have been created in the non-maintained sector since 2004/5. All eligible children are offered a high quality childcare place.			Steady growth in number of childcare places to pre-school children, including increased provision in the most deprived areas.	Children and Young People's Plan 2008
IMR	Only one other Local Health Board' records higher instances per 1000 births.			Children and Young People's Plan seeking to address this issue into the future.	Children and Young People's Plan 2008

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Source
Physical Inactivity	Primary school age children inactive: 15% Secondary school age children inactive: 21%	Welsh average: Primary: 12% Secondary: 24%			Children and Young People's Plan 2008
Diversity	12% of school age children are from a variety of minority ethnic backgrounds.				Children and Young People's Plan 2008
Ethnic Minorities 2001 (% of all persons)	4.8	Wales: 2.1		It is likely that this population has grown significantly.	Children and Young People's Plan 2008
Welsh Speaking 2001 (% of all persons)	9.6	Wales: 20.5		Low proportion	Newport City Council, Key Statistics

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Source
Deprivation	Caerleon: 16th least deprived ward in Wales Pillgwenlly: 15th most deprived			Newport has some of the most deprived Wards in Wales, together with some of the least deprived.	Children and Young People's Plan 2008
Unemployment 2006	Working age population: 6.5% 22% households with dependent children did not have an adult in employment (2001)	Welsh average: 5.3%			ONS 2007 in Children and Young People's Plan 2008
Benefits	8 wards (out of 20) account for 68.7% of all children (5490) living in benefits-dependent households.				Children and Young People's Plan 2008

A.3.3 Education: Future Capacity of Schools

The pupil forecasting model[5] allows the prediction of surplus places. By 2010/11 it is estimated that Newport City Council will have 8 schools with over 25% surplus places (3 schools lower than in 2007/08) and 13 schools that are oversubscribed by more than 10% (6 schools more than in 2007/08). At an LEA level it is estimated that by 2010/11 Newport will only have 4% surplus places across all primary schools and be 11% oversubscribed across secondary schools.

Crime

A.3.4 Overall Crime

(Police data refers to period 01st October 2006 – 31st September 2007)

- The last 12 months has seen a 3% increase in overall crime on the previous year.
- The most recent 6-month period has seen a reduction of 8% on the previous 6 months.

Over 50% of reported crime can be classed as acquisitive crime

The 2004/05 crime audit found that fear of crime is high in Newport communities and that residents are concerned about anti social behaviour. Certain crimes such as burglary, robbery, hate crime and domestic abuse have a disproportionate impact upon victims and there are reported to be concerns about speeding, graffiti, noise nuisance and other issues that impact upon the quality of life in residential areas.

The vast majority of residents (80.9%) have not experienced crime whilst living in Newport. The category with the highest return at 8.5% was car crime followed by harassment at 6.9%. Burglary had affected 3.7% of residents. When asked about security measures fitted to their dwellings, the following list provides the results:

Anti-social Incidents

- 40% of all anti-social incidents reported to the police were recorded within the four wards of Stow Hill, Lliswerry, Victoria and Bettws. A third of these incidents explicitly mention youths in the incident details as the cause of the call.
- ‘Rowdy/nuisance’ behaviour accounts for 72% of police anti social incidents
- There has been a decrease in reported incidents to the community safety wardens
- Groups of young people are the most common complaint.
- Noise complaints are also increasing.

[5] http://www.newport.gov.uk/stellent/groups/public/documents/report/cont219863.pdf

- The peaks in antisocial behaviour incidents tend to be in the autumn in October and November and during the late Spring/Summer.
- Allt-yr-yn and Shaftesbury wards are showing an increase in antisocial behaviour in specific areas within the wards.

A.3.5 Fear of Crime

- Members of the Citizens Panel did not feel as safe in 2007 during the day walking near their homes or in the city centre as they did in 2006.
- There has also been little change in how people felt at night when walking where they live or in the city centre.
- The majority of people still feel unsafe or very unsafe when walking in the city centre at night.

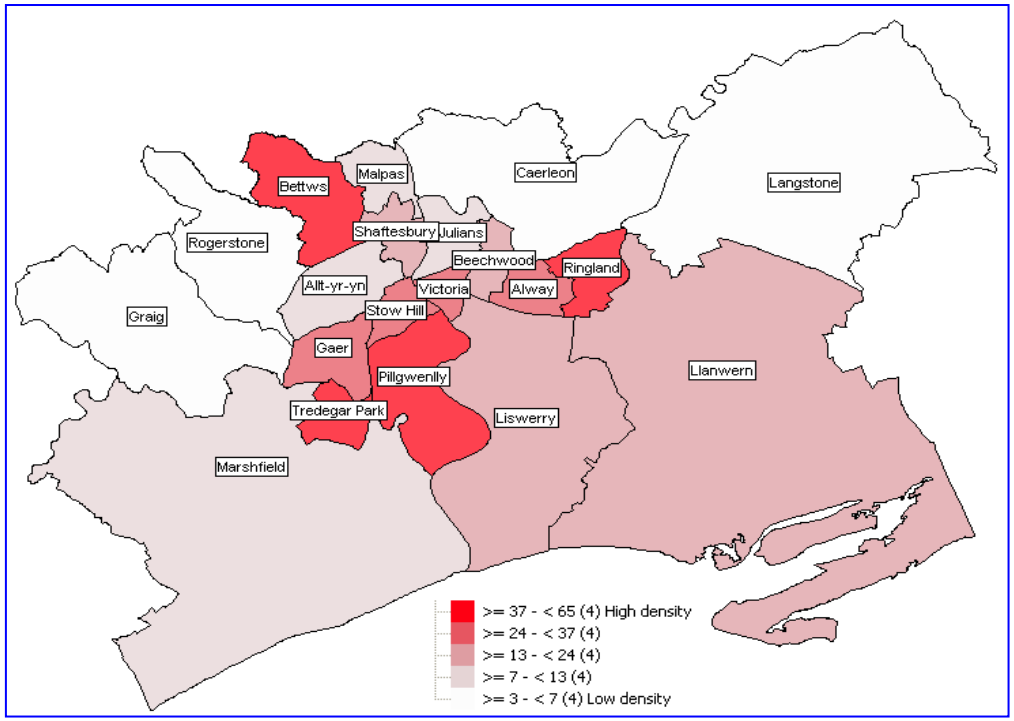
A.3.6 Deprivation and Fear of Crime

The following figures demonstrate the areas within Newport that suffer from high deprivation, and how this correlates with crime levels.

As the decline of traditional employment across South Wales has progressed, various social problems have intensified. Four of Newport's electoral wards feature within the list of Wales' 100 most deprived wards and a further six sub-wards qualify for funding under the Assembly Government's Communities First programme. The 2001 Census showed Newport ranking below the rest of the UK in several key social and economic indicators, for example, unemployment rates were just above the national average, with a greater number of Newport citizens suffering from a limiting long term illness.

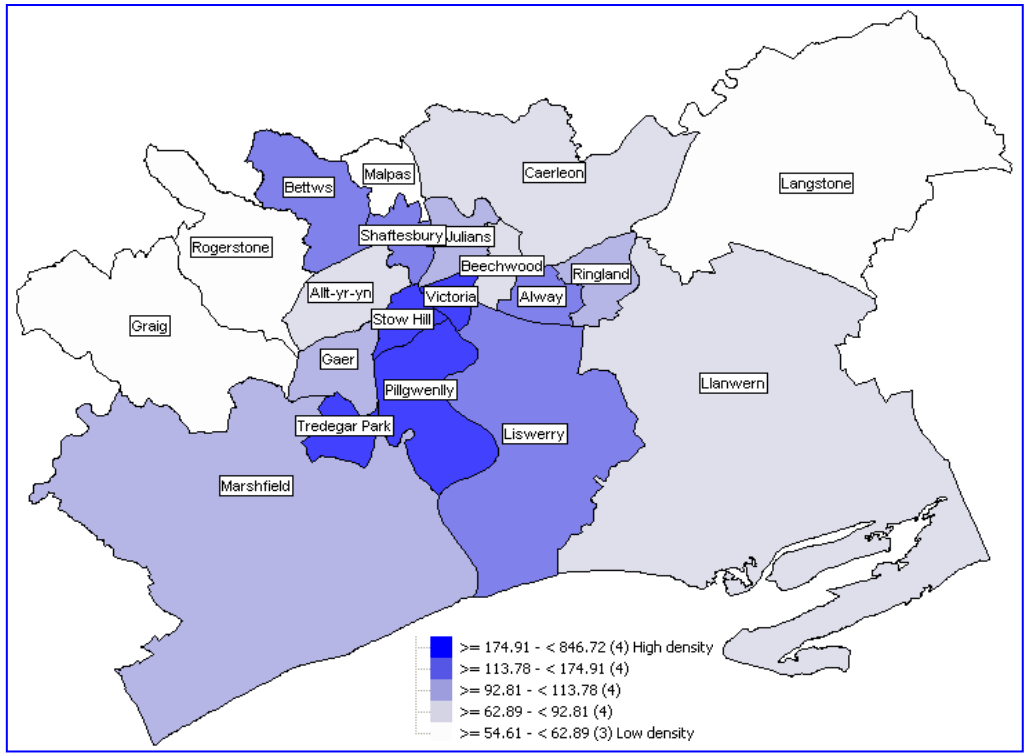
In Figures 3.3 and 3.4 it can be seen that eight of the 20 wards, which equates to 37% of Newport's population, are amongst the most deprived fifth of electoral wards in Wales (Newport Community Safety Partnership Strategic Assessment 2008)

Figure A.13 - Individual wards scored against the Welsh Index of Multiple Deprivation. Higher scores indicate more deprived areas.



Source: Newport Community Safety Partnership Strategic Assessment 2008

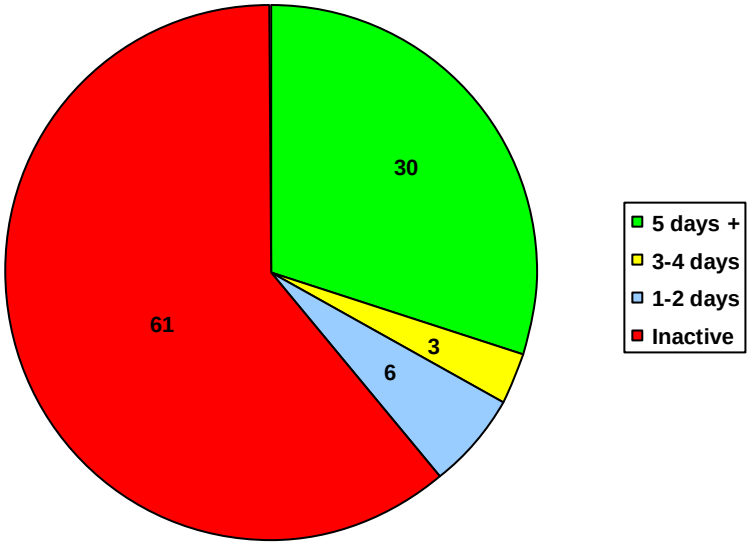
Figure A.14 - Crimes per 1,000 population as recorded in the last 12months.



Source: Newport Community Safety Partnership Strategic Assessment 2008

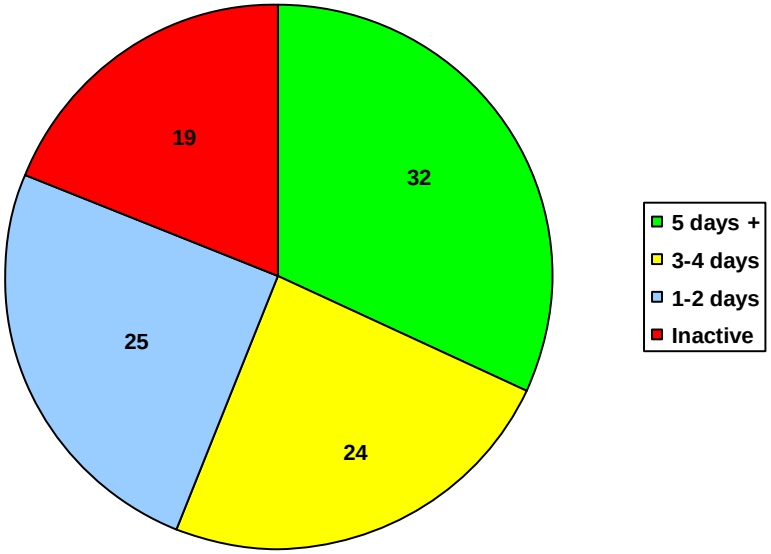
A.3.7 **Physical Activity (Sports Council for Wales 2006)**

Figure A.15 - Number of days on which 30 minutes of physical activity is undertaken: Adults (Newport)



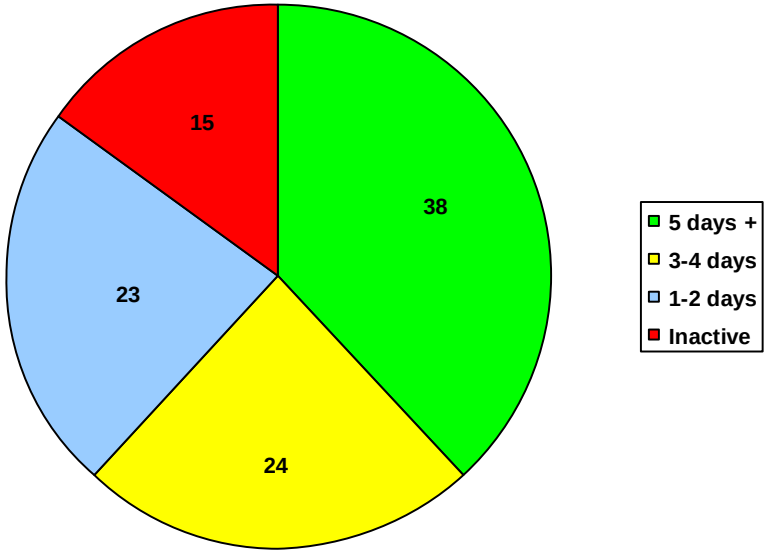
Base: Adults in Newport aged between 15 and 65 years

Figure A.16 - Number of days on which 60 minutes of physical activity is undertaken: Young people (Newport)



Base: Young people in Secondary Schools in Newport aged 11-16 years

Figure A.17 - Number of days on which 60 minutes of physical activity is undertaken: Children (Newport)



Base: Children in Primary Schools in Newport aged 7-11 years

Physical Activity

A.3.8 Open Space Provision by Ward

Judged against National Playing Field Association (NPFA) standards, Table A.13 demonstrates that in the majority of wards, there is a shortfall in provision of accessible open space (2006). This is the case in 12 out of the 20 wards, with the largest shortfall being 14.04ha in Victoria ward. However, there is a surplus against requirements in seven of the wards, with the largest over provision being 20.22ha in Liswerry ward. This indicates a large disparity in access to open space across the plan area, which could have implications for sustainable communities.

Table A.13 - Open Space Provision by Ward

Ward	Site Area (Ha)	Population 2001	NPFA req	Shortfall/ Surplus
ALLT-YR-YN	13.35	8583	20.60	-7.25
ALWAY	11.69	8492	20.38	-8.69
BEECHWOOD	12.23	7594	18.23	-6.00
BETTWS	26.51	8278	19.87	6.64
CAERLEON	17.26	8708	20.90	-3.64
GAER	32.5	8568	20.56	11.94
GRAIG	6.998	5492	13.18	-6.18
LANGSTONE	4	3905	9.37	-5.37
LISWERRY	45.701	10616	25.48	20.22
LLANWERN	5.78	3027	7.26	-1.48
MALPAS	20.886	8143	19.56	1.33
MARSHFIELD	3.4	4245	10.19	-6.79
PILLGWELLY	10.98	5333	12.80	-1.82
RINGLAND	17.48	8470	20.33	-2.85
ROGERSTONE	16.81	8807	21.14	-4.33
SHAFTESBURY	10.66	5488	13.17	-2.51
ST JULIAN'S	32.41	8729	20.95	11.46
STOW HILL	11.19	4453	10.69	0.51

Ward	Site Area (Ha)	Population 2001	NPFA req	Shortfall/ Surplus
TREDEGAR PARK	22.17	3387	8.13	14.04
VICTORIA	2.01	6688	16.05	-14.04

A.3.9 Access to Facilities: Thresholds

Assessment Standards

Table A.12 reproduces the BREEAM (EcoHomes 2006) accessibility standards to services and facilities identified as requirements in moving towards sustainable development. In addition, Barton et al. (2003) publication *Shaping Neighbourhoods,* has translated a combination of government publications and academic research into a useful summary table of desirable accessibility standards, reflecting the aims of achieving sustainable extensions to existing settlements. The relevant parts of the summary accessibility standards outlined in this publication are reproduced in Table A.13 and provide a more detailed and higher standard of provision than outlined in the EcoHomes standards.

Table A.14 - EcoHomes Rating Tra3: Local Amenities

Proximity to Local Amenities
Within 500m of a food shop and post box
Within 1000m of 5 of the following: food shop, postal facility, bank/cash machine, pharmacy, primary school, medical centre, leisure centre, community centre, public house, children's play area, place of worship, outdoor open access public area
Safe pedestrian routes to the local amenities

BREEAM: EcoHomes 2006

Table A.15 - Accessibility Standards

Local facility	Illustrative catchment populations	Minimum reasonable accessibility standards at different gross densities (assuming bendy routes)			
		40ppha	60ppha	80ppha	100ppha
Nursery/ first school	2,000	600m	500m	400m	400m
Primary/ middle school	4,000	800m	700m	600m	500m
Secondary School	8,000	1,200m	1,000m	700m	700m
Secondary School (large)	16,000	1,500m	1,200m	1,000m	1,000m
Health Centre (4 doctors)	10,000	1,200m	1,000m	900m	800m
Local Shop	1,500	500m	400m	400m	300m
Pub	6,000	1,000m	800m	700m	600m
Post Office	5,000	800m	700m	600m	600m
Community Centre	4,000	800m	600m	600m	500m
Local Centre	6,000	1,000m	800m	700m	600m
District Centre/ Superstore	24,000	1,900m	1,500m	1,300m	1,200m
Leisure Centre	24,000	1,900m	1,500m	1,300m	1,200m

Barton *et al*. (2003)

A.3.10 Community Facilities

There are 20 Community Centres and halls in and around the Newport area, for use by local groups and individuals. Most have catering facilities and some have a stage area, making them ideal venues for celebrations such as birthday parties and discos.

The Community Centres also play host to a wide range of activities for adults and children including fitness classes and after-school clubs.

Sustainable Transport; Accessibility; Human Health

A.3.11 Walking

There are approximately 300km of Public Rights of Way (PRoW) within the local authority area. The vast majority (85%) of currently recorded PRoW in Newport hold footpath status.

In addition to the Best Value Performance Indicators, a PRoW survey undertaken by CCW in 2002 covering 33% of the network in Newport produced results suggesting that Newport was amongst the best in Wales from the perspective of signposting and ease of use.

A.3.12 Cycle Routes

The National Cycle Network (NCN) in Newport provides opportunities for recreational use for cyclists and pedestrians. The NCN in Newport totals around 52km and runs through both urban and rural areas, with many sections being off road. However, it has been necessary to link routes across, or along, busy roads. There are three separate NCN routes in Newport, two of which form part of the Celtic Trail, which is a fully waymarked 220 mile journey across South and West Wales.

There are also a number of local cycle routes across Newport, totalling around 21km which provide links to the NCN and provide easier access to the countryside.

A.3.13 Cycling

Newport City Council is working in partnership with Sustrans and the Celtic Manor Resort to identify the issues associated with the creation of a new leisure/cycling route that, when completed, will create a route between Newport City Centre and the attractive open countryside around Caerleon, eventually linking to Wentwood Forest.

This proposed route will form part of the Sustrans Connect 2 project, which is all about connecting “people to people, people to places, and people to a pride in their local community” (www.sustransconnect2.org.uk)

Newport City Council is also about to commence cycle hire schemes to encourage families and beginners to take up cycling as an active pastime;

- The Active Lifestyles Cycle Hire Project will see almost 200 bikes located at Newport International Sports Village. This will include provision for youths, and bikes with child trailers. There is therefore a local need for safe, off-road and well way-marked cycle routes.
- The Active Lifestyles Cycle Hire Project will also have a cycle trailer for community use. This can be used to take the hire bikes into other communities, therefore making the project accessible across the City. Thus, there is a need for local, suitable waymarked trails throughout all communities within Newport.

The Local Health Board, in conjunction with Newport City Council, is running an active lifestyles initiative known as 'Going for Gold'. it is hoped that this will encourage greater participation in cycling and walking across the City: again necessitating local, suitable cycle trails, which are linked between areas, creating a suitable network for more active participants.

A.3.14 Human Health

According to the 2001 census, 21.6% of the Newport population were found to be living with a limiting long-term illness, which represented a large increase of 6% from 15.6% in 1991 and ranked Newport at 14 out of the 22 authorities (rank one – highest level of illness) in Wales. This compared with the figure of 18.2% for England and Wales, and 23.3% for Wales.

Figures for numbers of permanently sick or disabled people indicate that 7.9% of people fell into this category, ranking Newport 15 out of the 22 authorities.

An additional new Census question asking about state of health indicated that 12% of people stated that their health was "not good"m a figure close to the Welsh average of 12.4%.

The proportion of the resident population with a limiting long term illness ranged from 26.7% in Pillgwenlly and 26.4% in Ringland, down to 14.9% in Langstone. For Newport, this amounted to 21.6% of the resident population, which compared with 18.3% for England and Wales. The proportion of the resident population providing unpaid care ranged from 12.9% in Rogerstone and 12.6% in Caerleon, down to 9.3% in Victoria. For the city of Newport this amounted to 11.2% of the resident population, which compared with 10% for England and Wales.

Newport had the third highest rate of babies born with a 'low birth rate' across Wales in 2001, and an infant mortality rate significantly higher than the national average. Newport has a high rate of teenage pregnancies in 16-19 year old young women.

It is acknowledged that this data may be out of date, and measures are being taken to try to source more recent figures.

Housing

A.3.15 Households

In 2001 the city of Newport had 56,535 households with residents, an increase of 7.6% since 1991. The average household size decreased from 2.50 persons in 1991 to 2.39 in 2001. The average household size in England and Wales also decreased by 0.11 per cent during the same period.

Household types in 2008 tend to follow national (2004) distribution patterns, with the majority of households comprising two adults (35%), and the second largest is the traditional family (25%). Following this, the third largest distribution is Lone Older (60+years) (15%) with all other percentages under 10%.

In 2001, the highest proportion of lone parent households with dependent children was in Tredegar Park Ward (21.5%) followed by 14.7% in Always and Bettws. The proportion of households with dependent children and no earners ranged from 20.7% in Tredegar Park followed by 13.7% in Always, down to 2% in Graig Ward.

At the ward level, the proportion of households without the sole use of basic amenities fell from 1.3% in 1991 to 0.3% in 2001. The England and Wales figure also fell from 1.3% to 0.5%. 30% of households had no car in 2001 showing a 7% decrease since 1991. 26.8% of households in England and Wales had no car in 2001.

The proportion of households without the sole use of basic amenities was highest in Stow Hill Ward at 0.9%, compared with the City of Newport at 0.3%. Stow Hill also had the highest percentage of households in privately rented accommodation (19.9%) and the smallest average household size (2.06). The percentage of households without access to a car ranged from 6.3% in Langstone to 52.9% in Pillgwenlly. The Newport figure was 30.5%.

Owner occupation rose between 1991 and 2001 from 67.2% of households to 70.5%. Households renting from the Council or Housing Associations fell from 25.9% of the total in 1991 to 21.7% in 2001. The proportion of households renting privately also fell from 6.6% in 1991 to 4.8% in 2001. Owner occupied houses comprised 68.0% of the England and Wales total and those renting from the Councils/ Housing Associations made up 19.2% of the total. It is acknowledged that this data may be out of date, and measures are being taken to try to source more recent figures.

A.3.16 Material Assets, Population and Human Health: Housing

On 31 March 2005, the Local Authority had a housing stock of 9,544 homes, representing over 15% of total dwellings within Newport.

In line with national trends, the size of the Council housing stock has been steadily declining for a number of years. This is due to a number of tenants exercising the Right to Buy which in 2004 resulted in a loss of 200 homes from public sector ownership. Over the last four years, the City Council has also embarked on a rationalisation of its unpopular housing stock. A total of 570 homes requiring significant investment have been demolished. These units include maisonettes and flats in Always, Bettws and Ringland.

On 31 March 2005 there were 3,630 active and 3,455 deferred applicants on the Housing Register. In addition there were 1,009 existing tenants seeking a transfer to alternative accommodation. This compares with 2,799 and 2,462 respectively for the same date the previous year.

It is acknowledged that this data may be out of date, due to the fluctuating nature of the housing market, and measures are being taken to try to source more recent figures.

A.3.17 Quality of Housing Stock

Based on the House Condition Survey data, 45,200 dwellings (92.9%) can be classified as failing the WHQS. The only comparable available is from the Living in Wales 2004 survey which only considered social housing and found a 99.2% failure rate at that time.

The stock condition survey (2008) shows that £240 million capital investment will be required to bring the stock up to the Welsh Housing Quality Standard by 2012.

Table A.16 - Occupiers with a disability by dwelling condition

Group	Category 1 hazard	In disrepair	Fuel poor
Resident with disability	18.4%	19.2%	10.8%
Newport Average	23.9%	17.3%	8.2%

Source: 2008 House Condition Survey

A.3.18 Housing Affordability

Newport's annual house price increase since 1998 has been broadly in line with the Welsh average, but with Newport's average house price being consistently 4% higher than the Welsh average. Between April 2003 and April 2007, the average house price in Newport increased by 60%.

Homeless households in the greatest need increased by 70% in 2003/04 and homelessness applications increased by 50% in the last 3 years. In 2005-06 a total of 1,035 people presented themselves as homeless, of which 357 were from young people aged 16-24.

The figures in the baseline demonstrate that the average earner can no longer afford the average priced house in Newport. This affordability gap has widened in recent years – the percentage of homes sold for £80,000 or less fell from 80% in 1998 to 11% in 2005.

Table A.17 - Housing requirement over the next five years (2007)

Housing Type	Gross Housing Requirement	Housing Supply	Net Housing Requirement (Surplus)
5-year requirement			
Market	37,911	33,201	4,710
Intermediate	3,875	3,060	815
Social	17,247	15,333	1,913
TOTAL	59,033	51,594	7,438

Source: Newport, Torfaen and Monmouthshire Local Housing Market Assessment, Opinion Research Services 2007

Table A.18 – Newport Housing Market Trends 2006

	Average Earnings 2005	Lowest 10% Earnings
Level of Earnings	£25,756	£11,684
Mortgage Amount based on 3 times salary rate (95% mortgage)	£84,890	£42,574
Average Property Price	£152,438	£152,438
Affordability Gap	£67,548	£109,894

Source: Newport Housing Market Trends – March 2006 (Source for Average Earnings: Annual Survey of Hours and Earnings (ASHE), 2005). (in Local Housing Strategy 2007)

A.3.19 Housing and Ethnic Background

Pakistani, Indian and Chinese populations are more likely to own their own homes, as shown in the main data table below. This is consistent with the proportion of the Indian population employed in managerial roles. In the case of the Chinese and Pakistani populations this may be because they are more likely to be small employers or working on their own account and have properties attached to their business.

A.3.20 Private Sector Housing Condition Survey 2008

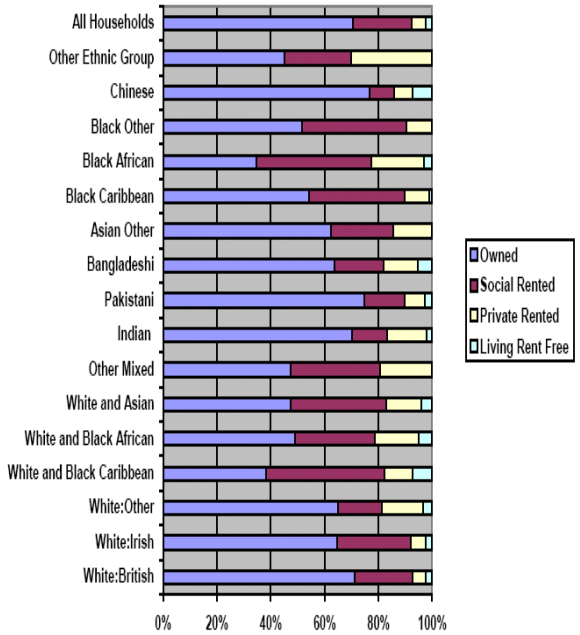
The vast majority of dwellings within Newport are either medium/large terraced houses (31.1%) or semi detached houses (29.6%). There are small proportions of converted flats (2.9%), low rise purpose built flats (five or less storeys) (4.5%) and bungalows (6.2%).

The vast majority of dwellings (90.8%) are houses generally occupied as built. Of the remainder, most are converted or purpose built flats. An estimated 2.1% of dwellings are HMOs, representing 1,010 buildings being used to house multiple households.

Table A.19 - Housing

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
Tenure (% of households) Owner occupied	70.5					Newport City Council, Key Statistics
Tenure (% of households) Rented council/housing association	21.7					Newport City Council, Key Statistics
Tenure (% of households) Rented private landlord	4.8					Newport City Council, Key Statistics
Tenure (% of households) Rented other	3					Newport City Council, Key Statistics
Detached	17.3					Newport City Council, Key Statistics
Semi-detached	32.5					Newport City Council, Key Statistics

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
Terraced	34.5					Newport City Council, Key Statistics
Flat/maisonette or apartment	11.9					Newport City Council, Key Statistics
Converted accommodation	3.5					Newport City Council, Key Statistics
Caravan or temporary	0.3					Newport City Council, Key Statistics

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
Tenure by Ethnic Group 						
Children residing in lone parent households (% of all persons)	29.7	25.1				Children and Young People's Plan 2008

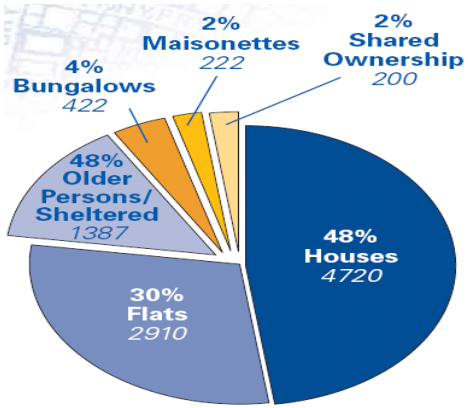
Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
Limiting Long Term Illness 2001 (% of all persons)	21.6	England: 18.2 Wales: 23.3				Newport City Council, Key Statistics
Person Providing Un-paid Care 2001 (% of all persons)	11.2	England: 10.0 Wales: 11.7				Newport City Council, Key Statistics
Household Amenities (% of households) With central heating and sole use of bath/shower and toilet	96.1					
Household Amenities (% of households) Without central heating and with sole use of bath/shower and toilet	3.57					
Unsuitable Housing Accommodation too Expensive	2251					Local Housing Strategy 2007 (Source Newport, Torfaen and Monmouthshire Local Housing Market Assessment, Opinion Research Services, 2007)

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
Unsuitable Housing Overcrowding	2281					Local Housing Strategy 2007 (Source Newport, Torfaen and Monmouthshire Local Housing Market Assessment, Opinion Research Services, 2007)
Unsuitable Housing Sharing Facilities	1164					Local Housing Strategy 2007 (Source Newport, Torfaen and Monmouthshire Local Housing Market Assessment, Opinion Research Services, 2007)
Unsuitable Housing Home too Difficult to Maintain	3130					Local Housing Strategy 2007 (Source Newport, Torfaen and Monmouthshire Local Housing Market Assessment, Opinion Research Services, 2007)

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
Unsuitable Housing Support Needs	4609					Local Housing Strategy 2007 (Source Newport, Torfaen and Monmouthshire Local Housing Market Assessment, Opinion Research Services, 2007)
Unsuitable Housing Condition of Dwelling or Amenity Problems	8292					Local Housing Strategy 2007 (Source Newport, Torfaen and Monmouthshire Local Housing Market Assessment, Opinion Research Services, 2007)
Unsuitable Housing Separation from Partner	235					Local Housing Strategy 2007 (Source Newport, Torfaen and Monmouthshire Local Housing Market Assessment, Opinion Research Services, 2007)

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
Unsuitable Housing Neighbour Problems or Harassment	2047					Local Housing Strategy 2007 (Source Newport, Torfaen and Monmouthshire Local Housing Market Assessment, Opinion Research Services, 2007)
Unsuitable Housing Tenancy/ Mortgage Under Notice	781					Local Housing Strategy 2007 (Source Newport, Torfaen and Monmouthshire Local Housing Market Assessment, Opinion Research Services, 2007)
Unsuitable Housing Total	19,145				There is a high number of people living in unsuitable housing.	Local Housing Strategy 2007 (Source Newport, Torfaen and Monmouthshire Local Housing Market Assessment, Opinion Research Services, 2007)

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
Private Sector stock totals by sub-area	▪ St Julians/ Victoria/ Beechwood: 18.7% ▪ Caerleon/ Langstone/ Llanwern: 12.3% ▪ Always/ Liswerry/ Ringland: 16.9% ▪ Gaer/ Stow Hill/ Tredegar Park: 10.9% ▪ Allt-yr-yn/Malpas/Shaftesbury: 17.1% ▪ Bettws/Graig/Marshfield/ Rogerstone: 20.8% ▪ Pillgwenlly: 3.3%					Private Sector Housing Condition Survey 2008

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
Profile of Council Properties Owned by Newport City Council 						http://www.newport.gov.uk/stellent/groups/public/documents/report/cont035940.pdf

A.3.21 Cultural Heritage: Stow Hill Area Chartist Project

The Chartist March of 1839 is a unique part of Newport's history with huge latent potential to promote the regeneration of the city centre as a major heritage site of national importance. Appropriate street furniture and planting on Stow Hill from St. Woolos to Westgate Square will demarcate this area as specifically "Chartist". The commissioning of a number of Chartist murals along the length of lower Stow Hill (to replace the existing mural in John Frost Square) will raise the profile of this part of the city centre, enhancing its recreational and historic assets, and assist in reducing the fear of crime. Chartist murals appearing on Stow Hill and enhanced interpretation of the existing sculptures in Westgate Square will amplify city centre vitality and viability by encouraging footfall throughout the day and evening. The conservation and regeneration of buildings such as the Westgate Hotel, the adjacent St. Mary's Institute and the derelict buildings at the junction of School Lane/Stow Hill will enhance the historic environment to make this a key feature of the city centre, creating a sense of place, local identity and distinctiveness, improving the image of the townscape to further support business growth and encourage inward investment.

A sustainable Chartist Citizenship Centre will create a centre of excellence for community cohesion and citizenship education, generating interest from the education and tourist sectors adding to educational achievement by creating additional educational facilities for both passive and active learning and networking with other heritage sites in Newport and beyond.

Chartist Citizenship Project – Benefits (Accent Newport Trust)

- The city's historic environment conserved and enhanced
- Chartist Citizenship Centre - A Centre of Excellence
- Increased business growth
- Chartist Education Pack for KS2 pupils
- Enhanced image of Newport
- Improved educational achievement
- Increased city centre footfall during the day & evening
- People appreciate their own and other cultures
- More tourists visit the city
- A sense of place and distinct local identity created
- Tourists tell their friends about the Chartist story
- Citizenship responsibilities promoted
- A dynamic place to promote our heritage
- Less anti-social behaviour
- A Chartist Festival cultural fortnight
- Reduced fear of crime
- Professionally written Chartist Musical Production
- Enhanced curriculum materials for citizenship education

- Musical adaptation for KS3/4 pupils
- Better interaction between community groups
- More people thinking about culture & heritage
- Citizenship issues are presented in concrete form
- Viability of the city is improved
- Attitudes towards BME groups become more positive
- A focus for citizenship education
- Improved formal and informal education
- Improved townscape to support investment
- Improved recreational and historic assets in the city
- Voter apathy challenged
- More people celebrate the Chartists' story
- Enhanced social and recreational facilities
- Further research into the Chartist story
- Better interaction between community groups
- Cultural appreciation is improved
- Improved health by more walking opportunities
- Individual and community life is enriched
- Newport's cultural identity strengthened
- Communities working together for the common good
- Promotion of other heritage sites in Newport & beyond
- Digitisation of Chartist depositions and artefacts

- More people being active in civic life
- Capacity building in the local community
- Better sense of pride in the city
- Increased local biodiversity and additional habitats
- Another asset to market during the Ryder Cup
- More people thinking about the benefits of tourism
- Stow Hill proud of its heritage
- A more vibrant city
- A place of sanctuary and safe for young people set up
- More people working together for a better city
- Correlation of Chartist Websites
- More people working for the common good
- Community cohesion strengthened
- More young people with aspirations for the future
- Our common heritage celebrated
- More people becoming active citizens
- More people working together to build a better future

A.4 Economic Baseline

SEA topics: Population, Material Assets

A.4.1 Benefit Claimants

Newport has a high proportion (3.1% of working age population 2008) of people claiming Job Seekers Allowance, compared to Wales (2.4%) and Great Britain (2.2%).

Compared to Great Britain, Newport has a high proportion of people claiming benefits (19.2% compared to 14.2% of resident working age population 2007). However, this figure is similar to the Wales average of 18.8%. The highest proportion of the total benefits claimed is incapacity benefit at 9.9%. This is higher than Great Britain (7.2%) but lower than the Welsh average (11.0%)

A.4.2 Earnings

Median weekly full time earnings in Newport are £426.80, markedly above the Welsh median of £402.50. This is; however, considerably lower than the UK median of £447.10. Part time workers in Newport earn only slightly more than the Welsh median of £137.50 a week, with a median pay of £140.202.

A.4.3 Employment

The unemployment rate from Oct 2006-Sep 2007 was 6.0% compared to 5.3% in both Wales and England. This suggests a lack of employment opportunities in Newport. The economic activity rate ranged from 71.3% in Graig Ward down to 50% in Pillgwenlly. Unemployment ranged from 13.8% in Pillgwenlly followed by 11.8% in Tredegar Park, down to 2.4% in Langstone (2001). It is acknowledged that this data may be out of date, and measures are being taken to try to source more recent figures.

Between 2001 and 2006, there has been a marked decrease in employment in the construction and manufacturing sectors. In 2006, 81% of employment was in the service sector, with the highest proportion (29.7% of all employment) being employed in Public Administration, Education & Health.

A.4.4 Economic Activity

Newport has proved to be adaptable and resilient, securing high levels of investment in modern growth sectors of the economy. Over the last decade Newport has seen more than £3 billion of private sector investment and created over ten thousand jobs, primarily in high technology and service industries, with figures showing that the daily inflow of commuters is second only to Cardiff within Wales. There have been encouraging rates for the start up of new businesses, with Newport ranking amongst the top five locations in the UK for business formation (a community strategy for Newport 2005 – 2015)

In 2006, there were more VAT registrations for businesses (9.7% as a proportion of stock at the end of the year) than deregistrations (8.2%) indicating a growth in local business. This compares to the registrations in Wales (7.8%) and Great Britain (9.4%) who show lower registrations, but also fewer deregistrations (6.3% and 7.4% respectively). The stock in Newport at the end of 2006 was 3,035.

Positive trends and indicators of ongoing economic success can be linked directly to Newport's strategic location, excellent communication links and skilled, flexible workforce.

The percentage of the population that was economically active Oct 2006-Sep 2007 was 78.4% (of these 73.8% are employed). This is comparable to the Great Britain figure of 78.5% and higher than Wales at 75.1%. Compared to 2001, the Newport proportion shows an increase of approximately 15%.

A.4.5 Newport Redevelopment and Regeneration[6]

(Source: Newport Community Safety Partnership Strategic Assessment 2008)

Newport is undergoing an extensive transformation that is reported as being capable of changing the face of the city.

Newport City Council together with Newport Unlimited and a number of developers are taking forward projects that will regenerate the city and aim to turn it into a thriving centre for business, leisure and living.

The vision set out in Newport's master plan focuses on the renewal of the city, aiming to revive the city centre and the surrounding districts. The plan calls for a more sustainable city, where people can live closer to places where they work and shop and are encouraged to use public transport.

The regeneration of Newport, which includes the new £200 million facelift of the city centre, is now well under way. The new retail scheme covers an area comprising of Kingsway, Upper Dock Street, John Frost Square and the Bus Station. This site is expected to be completed for the 2010 Ryder Cup.

The new £5 million Newport City Footbridge was officially opened on 12th September 2006 - the first project to be delivered as part of the regeneration programme. The Newport City Footbridge forms a key part of Newport's regeneration plans by linking the east and West banks of the River Usk, allowing people to travel quickly and safely between the two. The footbridge significantly improves access to the city centre from the east of Newport.

Other developments include:

- New City Centre University Campus - A new multimillion-pound campus for Newport's city centre has been given the go-ahead. The £20 million campus will be situated on the banks of the River Usk in the city centre, and will be the first phase of an intended £50 million development for the University. Initially it will house the Newport School of Art, Media and Design, signalling a return of the school to the centre of the city. According to Universities UK, universities have a major impact on their surroundings. For every 100 university jobs, a further 89 are created by 'knock on' effects, and Higher Education creates about £4 billion in foreign earnings annually for the UK. The new campus will be part of a lively cultural hub on the banks of the Usk, and attract other facilities and amenities.
- City Spires - Plans to develop the current Cambrian Centre into a new £90 million retail and leisure scheme called City Spires are progressing. Proposals for the City Spires development have been granted planning permission by the council, including 92,000 sq. ft of retail and leisure space, 80,000 sq. ft of office space, an 882-space car park, hotel and apartments. The development, with its 100-metre skyscraper tower, will create a bold statement of the city's ambition at a gateway location into the city centre. The developers are also including more than £1 million of works to improve the area along Queensway and Cambrian Road and are re-opening Railway Street as a pedestrian route. Developers will completely redevelop the centre to complement the £200 million Friars Walk project they are already leading in the city centre.

[6] Source www.newport.gov.uk

- Work on transforming part of the former Pirelli Cables site in Newport into a high-quality industrial park has started. Forty-five industrial units, providing 43,000 sq. feet of workspace with the capacity to accommodate approximately 100 people, are being built on just over four acres of the 26-acre brownfield site. The £3.9 million project is a joint venture between the Welsh Assembly Government and Newport and Gwent Enterprise (NGE) and has been supported by £1.3 million of European funding. • The Business Park will provide 42 small units and three larger units and will have CCTV, security fencing and an automated gate entry system.
- The area around Spytty Pill will become a new ecological park along the river, providing a haven for wildlife.
- Development on the previously vacant and derelict riverbank is already underway with housing developments taking place at Willenhall Street and other developments are planned for the remaining sites down to Spytty Pill.
- Plans to regenerate Alway have also been approved after a long period of public consultation. Developers will be building 239 homes, a community centre, police station, retail units, multi-use games area, and other works. The 7.5 Ha site will be in a figure of eight shape around Elgar Circle in the north and Alway Parade to the south.
- Llanwern development - Plans for almost 4,000 homes at Llanwern represent one of the largest brownfield development schemes in Wales. Permission has been granted to transform the 600-acre former steelworks site into a £1billion sustainable, mixed use development comprising housing, office and industrial space, public open space and a range of community facilities. The full redevelopment of this site, which was formerly part of the Corus steelworks site, is expected to take 20 years to complete. Facilities being provided include two new schools, lakes and other open spaces, as well as a park and ride facility to serve a new railway station. Substantial new sports and play areas will be created, with a multipurpose community centre, and a district centre with local shops, café bars and restaurants. At the heart of the new development will be three inter-connected lakes and a large park area. Construction of the scheme and on-site employment space will generate approximately 6,000 new jobs, nearly as many as the steelworks in its heyday. The development was one of three major regeneration projects for the east of the city that recently received planning approval.

A.4.6 Ethnic Background

The data shows the economically active proportion of the Indian population, over 50% of which were employed in managerial occupations. The economically active proportion of the Bangladeshi population was most likely to be employed in semi routine and routine occupations.

A.4.7 Travel to work

Figures from the 2001 Census of Population show a total of 69,784 people working in Newport, which is an increase from 61,190 in 1991. The proportion travelling in from outside Newport has increased. 29,646 or 42% were resident outside of the Authority in 2001, compared with 34.9% in 1991 and 29.1% in 1981. The origins of Newport's workforce can be seen in the table below (the table includes all Authorities with at least 100 of their residents working in Newport).

In 2001, 57.5% of the workforce resided in Newport itself while four other Authorities each provided more than 5% of the labour force, i.e. Caerphilly (10.8%), Torfaen (9.0%), Cardiff (7.0%) and Monmouthshire (6.1%). Swansea, South Gloucestershire, Powys and North Somerset, meanwhile, all supplied more than 100 workers to Newport in 2001 despite not doing so in 1991.

The largest increase in the share of Newport's workforce over the ten years came from Cardiff, followed by Torfaen and Rhondda, Cynon Taff. The only reduction in percentage share was Newport itself (-7.6 percentage points), indicating a rise in commuting to the area.

The number of workers resident in Newport in 2001 was 56,154, compared with 52,210 in 1991. The majority of these, 40,138 or 71.5%, remained in Newport to work. Outside Newport, the most popular destination of its resident workforce was Cardiff (9.5%), followed by Torfaen (5.4%) and Monmouthshire (3.6%).

The numbers commuting to work in Newport were much higher than residents travelling out to work, illustrating the importance it has to the surrounding region. There was a net inflow of 13,630 workers in 2001, compared with 8,980 in 1991 and 8,300 in 1981.

The majority of people in Newport drove to work by car or van (67.7%), as was the case in England and Wales although the figure was lower at 55.2%. A greater proportion of people in Newport also travelled to work by bus, minibus or coach (8.3% Newport : 7.4% England & Wales) and as a passenger in a car, van, taxi or minicab (9.4% Newport : 6.8% England & Wales) than at the national level.

Overall public transport (i.e. train, underground, metro, light rail, tram, bus, minibus or coach) was utilised to a greater extent nationally (14.5% England & Wales : 9.6% Newport) due to train, underground, metro, light rail or tram use being substantially more widespread in England and Wales (7.1% England & Wales : 1.3% Newport). Newport did, however, have the second highest proportion of people commuting to work by public transport in Wales, albeit that overall numbers are relatively low.

Travelling on foot ranked as the second most significant method of transport at the national scale compared with fourth in Newport. In addition, the percentage share using a bicycle was more than twice as high in England and Wales (2.8%) than in Newport (1.1%), and the proportion of people working from home was noticeably more widespread at the national level (9.2% England & Wales: 4.4% Newport).

The only method of transport to experience an increase in its percentage share between 1991 and 2001 was the driving of a car (+6.6 percentage points), although the proportion of those working at home also rose by 1.5 percentage points. The numbers travelling as car passengers (+801) and by bicycle (+66) both grew over the period, despite their percentage shares falling by 0.5 percentage points and 0.1 percentage points, respectively.

Commuting by bus, travelling by foot and, to a lesser extent, the use of motorcycles and trains, however, all declined both in absolute and proportional terms. Commuting by bus fell by 1,329 people and its share by 3.2 percentage points, motorcycle use decreased by 213 people and 0.5 percentage points, and train use declined by 51 people and 0.3 percentage points. Travelling on foot, meanwhile, contracted by 834 people and proportionately by 2.2 percentage points, which may be due to the population working increasingly further afield, with the average distance travelled to work being 11.45km in 2001.

It is acknowledged that this data may be out of date, and measures are being taken to try to source more recent figures.

Material Assets: Economy

A.4.8 Tourism

The value of tourism to the economy of Newport has risen by over 35% in the last 6 years (draft Tourism Strategy for Newport 2004-2008). Tourism is now worth £152 million annually to the economy of Newport. 420 Full Time Equivalent jobs have been created over the same period.

A recent study show that 3,635 jobs are in this sector footprint, equating to over 5% of employment in Newport.

Grant has already been allocated by the Welsh Assembly Government for the Five Counties regeneration programme for tourism. With the advent of the Ryder Cup in 2010 the eyes of the world will be on Newport and indeed is now attracting attention.

The substantial growth in the value of tourism is due to a general growth in the industry worldwide, effective marketing campaigns especially in the Business tourism sector, the programme of major Millennium Stadium Events in Cardiff and substantial private sector investment such as the Celtic Manor.

Newport has a rich heritage, especially Roman (see landscape)

The county boasts a host of recreational and leisure provision including internationally renowned golfing, Tredegar House and Country Park, and the Celtic Manor Resort.

A.4.9 Retail

Due to its current market share, coupled with strong expenditure and population growth in the catchment, there is significant potential capacity for the city centre to attract more development in the run up to 2016, rising from 7,000 m^2 gross in 2006, to 34,400 m^2 in 2011 and 66,200 sq m gross in 2016. This includes both the full range of fashion, household and other comparison goods as well as electrical and DIY goods and furniture, carpets etc.

A.4.10 Education and skills

The percentage of the population with no qualifications across the City of Newport was recorded at 33.6%, positioning Newport at nine in Wales (rank one – lowest level of qualifications). The percentage of the population with a degree or higher was 16.8%, making Newport 13 in Wales (rank one – highest level of population with degree or higher).

The proportion of residents aged 16 to 74 with no qualifications ranged from 50.2% in Ringland followed by 49.2% in Bettws, down to 17.2% in Graig.

Currently there are approximately 160 pupils taught in special schools. 100 of these are taught within the Newport area and attend the authority's Special School (Maes Ebbw). The school has developed a successful inclusion programme and has good links with several primary and secondary schools.

A.4.11 Use of resources: capacity

In Newport the last estimated Performance Indicator showed a 6.8% level of surplus places in primary schools and 6.8% in secondary.

A number of schools show a high level of oversubscription. Of these Always Primary, Crindau Primary, Gaer Junior, Llanmartin Primary, Monnow Junior, Ringland Primary and Rogerstone Primary all have Special Educational Needs units attached to their schools.

A.4.12 Schools and the Community

Many of the Authority's schools act as centres for community activity and involvement, either based on activities of the school and the adult and youth education programmes provided through the LEA, or through the variety of other independent activities organised using school premises.

Table A.20 – SEA Topics: Material Assets, Climatic Factors, Human Health, Population

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
% Economically Active (aged 16-74) Oct 2006-Sep 2007	78.4	Wales: 75.1 Great Britain: 78.5		**2001** 63.1 Male: 70.5 Female: 56.1	The percentage of the population that was economically active Oct 2006-Sep 2007 was 78.4% (of these 73.8% are employed). This is comparable to the Great Britain figure of 78.5% and higher than Wales at 75.1%. Compared to 2001, the Newport proportion shows and increase of approximately 15%. However, the unemployment figure in the same period was 6.0% compared to 5.3% in both Wales and England. This suggests a lack of employment opportunities in Newport.	Nomisweb Local authority profile for Newport
% Economically Inactive Oct 2006-Sep 2007	21.6	Wales: 24.9 Great Britain: 21.5		**2001** 36.9 Male: 29.5 Female: 43.9		Nomisweb Local authority profile for Newport

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
% of Economically Active: Employees Oct 2006-Sep 2007	73.8	Wales: 70.9 Great Britain: 74.3		**2001** 51.3, M: 54.7, F:48		Nomisweb Local authority profile for Newport
% of Economically Active: Self Employed Oct 2006-Sep 2007	7.4	Wales: 8.6 Great Britain: 9.3		**2001** 5.5, M: 8.4, F:2.8		Nomisweb Local authority profile for Newport
% of Economically Active: Unemployed Oct 2006-Sep 2007	6.0	Wales: 5.3 Great Britain: 5.3		**2001** 3.9, M: 5.3, F:2.7		Nomisweb Local authority profile for Newport
Average Hours worked per week	Males: 41.94 Females: 30.28					Nomisweb Local authority profile for Newport

<table>
<tr><th>Indicator</th><th>Quantified data (Newport)</th><th>Comparators (Quantified data for South Wales and Wales/England)</th><th>Targets</th><th>Trends</th><th>Issue identified</th><th>Source</th></tr>
<tr><td colspan="2">Origins of Newport Workforce 2001
<table>
<tr><th>Origin of Newport Workforce</th><th>No.</th><th>% of Newport Workforce</th></tr>
<tr><td>Newport</td><td>40,138</td><td>57.5%</td></tr>
<tr><td>Caerphilly</td><td>7,527</td><td>10.8%</td></tr>
<tr><td>Torfaen</td><td>6,305</td><td>9.0%</td></tr>
<tr><td>Cardiff</td><td>4,867</td><td>7.0%</td></tr>
<tr><td>Monmouthshire</td><td>4,237</td><td>6.1%</td></tr>
<tr><td>Rhondda, Cynon, Taff</td><td>1,426</td><td>2.0%</td></tr>
<tr><td>Blaenau Gwent</td><td>1,408</td><td>2.0%</td></tr>
<tr><td>Vale of Glamorgan</td><td>857</td><td>1.2%</td></tr>
<tr><td>Elsewhere Outside of Wales</td><td>801</td><td>1.1%</td></tr>
<tr><td>Bridgend</td><td>472</td><td>0.7%</td></tr>
<tr><td>Forest of Dean</td><td>296</td><td>0.4%</td></tr>
<tr><td>Merthyr Tydfil</td><td>247</td><td>0.4%</td></tr>
<tr><td>Swansea</td><td>223</td><td>0.3%</td></tr>
<tr><td>Bristol, City of</td><td>193</td><td>0.3%</td></tr>
<tr><td>Neath Port Talbot</td><td>191</td><td>0.3%</td></tr>
<tr><td>South Gloucestershire</td><td>158</td><td>0.2%</td></tr>
<tr><td>Powys</td><td>157</td><td>0.2%</td></tr>
<tr><td>Elsewhere in Wales</td><td>155</td><td>0.2%</td></tr>
<tr><td>North Somerset</td><td>126</td><td>0.2%</td></tr>
<tr><td>Total</td><td>69,784</td><td>-</td></tr>
</table></td><td></td><td></td><td>29,646 or 42% were resident outside of the Authority in 2001, compared with 34.9% in 1991 and 29.1% in 1981</td><td>Implications for climate change and sustainable transport solutions.</td><td>Nomisweb Local authority profile for Newport</td></tr>
</table>

<table>
<tr><th>Indicator</th><th>Quantified data (Newport)</th><th>Comparators (Quantified data for South Wales and Wales/England)</th><th>Targets</th><th>Trends</th><th>Issue identified</th><th>Source</th></tr>
<tr><td colspan="2">Destinations of Newport Workforce 2001
<table>
<tr><th>Destination of Newport Resident Workers</th><th>No.</th><th>% of Newport Resident Workers</th></tr>
<tr><td>Newport</td><td>40,138</td><td>71.5%</td></tr>
<tr><td>Cardiff</td><td>5,310</td><td>9.5%</td></tr>
<tr><td>Torfaen</td><td>3,030</td><td>5.4%</td></tr>
<tr><td>Monmouthshire</td><td>2,008</td><td>3.6%</td></tr>
<tr><td>Caerphilly</td><td>1,620</td><td>2.9%</td></tr>
<tr><td>Elsewhere Outside of Wales</td><td>1,432</td><td>2.6%</td></tr>
<tr><td>Bristol, City of</td><td>609</td><td>1.1%</td></tr>
<tr><td>Rhondda, Cynon, Taff</td><td>431</td><td>0.8%</td></tr>
<tr><td>Vale of Glamorgan</td><td>413</td><td>0.7%</td></tr>
<tr><td>South Gloucestershire</td><td>344</td><td>0.6%</td></tr>
<tr><td>Swansea</td><td>230</td><td>0.4%</td></tr>
<tr><td>Bridgend</td><td>225</td><td>0.4%</td></tr>
<tr><td>Blaenau Gwent</td><td>201</td><td>0.4%</td></tr>
<tr><td>Elsewhere in Wales</td><td>163</td><td>0.3%</td></tr>
<tr><td>Total</td><td>56,154</td><td>-</td></tr>
</table>
Source: 2001 Census of Population, Origin-Destination Statistics</td><td></td><td></td><td></td><td>Implications for climate change and sustainable transport solutions.</td><td>Nomisweb Local authority profile for Newport</td></tr>
<tr><td>Travel to Work 2001
Car or van
(% of persons in employment)</td><td>67.7</td><td>England and Wales: 55.2</td><td></td><td rowspan="2">The only method of transport to experience an increase in its percentage share between 1991 and 2001 was the driving of a car (+6.6 percentage points),</td><td></td><td>Newport City Council, Key Statistics</td></tr>
<tr><td>Travel to Work 2001
Passenger in car or van (% of persons in employment)</td><td>9.4</td><td>England and Wales:6.8</td><td></td><td></td><td>Newport City Council, Key Statistics</td></tr>
</table>

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
Travel to Work 2001 Bus (% of persons in employment)	8.3	England and Wales:7.4		although the proportion of those working at home also rose by 1.5 percentage points. The numbers travelling as car passengers (+801) and by bicycle (+66) both grew over the period despite their percentage shares falling by 0.5 percentage points and 0.1 percentage points respectively.		Newport City Council, Key Statistics
Travel to Work 2001 On foot (% of persons in employment)	6.5	England and Wales:10.0				Newport City Council, Key Statistics
Travel to Work 2001 Work from home (% of persons in employment)	4.4	England and Wales:9.2				Newport City Council, Key Statistics
Travel to Work 2001 Train (% of persons in employment)	1.3	England and Wales:7.1		Commuting by bus, travelling by foot and, to a lesser extent, the use of motorcycles		Newport City Council, Key Statistics

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
Travel to Work 2001 Motor cycle (% of persons in employment)	1.0	England and Wales:1.1		and trains, however, all declined both in absolute and proportional terms. Commuting by bus fell by 1,329 people and its share by 3.2 percentage points, motorcycle use decreased by 213 people and 0.5 percentage points, and train use declined by 51 people and 0.3 percentage points. Travelling on foot, meanwhile, contracted by 834 people and proportionatel y by 2.2 percentage points, which		Newport City Council, Key Statistics
Travel to Work 2001 Bicycle (% of persons in employment)	1.1	England and Wales:2.8				Newport City Council, Key Statistics
Travel to Work 2001 Other (% of persons in employment)	0.3	England and Wales:0.5				Newport City Council, Key Statistics
Availability of Cars (% of households) No cars	30.5	England and Wales: 26.8 Wales: 26.0				Newport City Council, Key Statistics
Availability of Cars (% of households) One	44.1	England and Wales: 43.8 Wales: 45.5				Newport City Council, Key Statistics

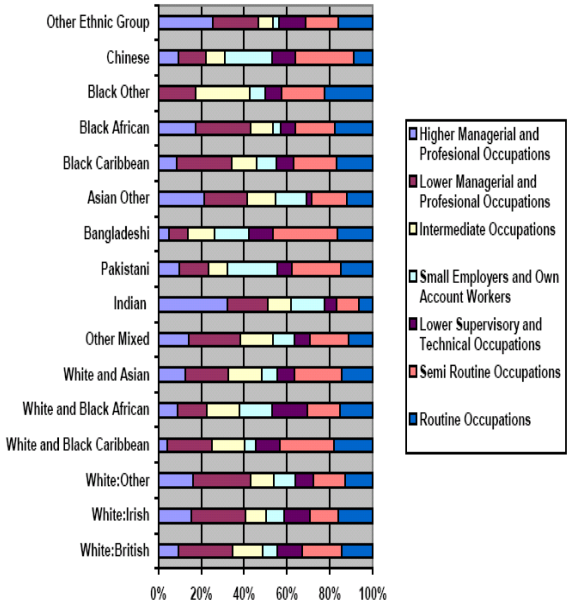
Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
Availability of Cars (% of households) Two	20.9	England and Wales: 23.5 Wales: 22.9		may be due to the population working increasingly further afield, with the average distance travelled to work being 11.45km4 in 2001.		Newport City Council, Key Statistics
Availability of Cars (% of households) Three or more	4.5	England and Wales: 5.9 Wales: 5.6				Newport City Council, Key Statistics
Industry of Employment (% of all persons in employment) Agriculture, Fishing & Mining			Doesn't appear in 2006 statistics	2001 0.7		Newport City Council, Key Statistics
Industry of Employment (% of all persons in employment) Energy & Water			Doesn't appear in 2006 statistics	2001 0.9		Newport City Council, Key Statistics
Industry of Employment 2006 (% of all persons in employment) Construction	3.3	Wales: 5.3 Great Britain: 4.8	decline	**2001** 6.0	Between 2001 and 2006, there has been a marked decrease in employment in the construction and	Newport City Council, Key Statistics Nomisweb Local authority profile for Newport

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
Industry of Employment 2006 (% of all persons in employment) Manufacturing	13.8	Wales: 13.4 Great Britain:10.9	decline	**2001** 18.1	manufacturing sectors. In 2006 81% of employment was in the service sector, with the highest proportion (29.7% of all employment) being employed in Public Administration, Education & Health.	Newport City Council, Key Statistics Nomisweb Local authority profile for Newport
Industry of Employment 2006 (% of all persons in employment) TOTAL SERVICES	81.0	Wales: 79.6 Great Britain: 82.9				Newport City Council, Key Statistics Nomisweb Local authority profile for Newport
I Industry of Employment 2006 (% of all persons in employment) Distribution, hotels & restaurants	21.7	Wales: 23.4 Great Britain: 23.5		Hotels & Catering, Wholesale & Retail Trade 2001: 17.3+5.0		Newport City Council, Key Statistics Nomisweb Local authority profile for Newport
Industry of Employment 2006 (% of all persons in employment) Transport, Storage & Communication	5.7	Wales: 4.3 Great Britain: 5.9		**2001** 7.0		Newport City Council, Key Statistics Nomisweb Local authority profile for Newport
Industry of Employment 2006 (% of all persons in employment) Finance, IT, other business activities	20.4	Wales: 14.2 Great Britain: 21.2		**2001** 14.6		Newport City Council, Key Statistics Nomisweb Local authority profile for Newport

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
Industry of Employment 2006 (% of all persons in employment) Public Administration, Education & Health	29.7	Wales: 32.2 Great Britain: 26.9		**2001** 26.0		Newport City Council, Key Statistics Nomisweb Local authority profile for Newport
Industry of Employment 2006 (% of all persons in employment) Other	3.5	Wales: 5.5 Great Britain: 5.3		**2001** 4.4		Newport City Council, Key Statistics Nomisweb Local authority profile for Newport
Industry of Employment 2006 (% of all persons in employment) Tourism related (Tourism consists of industries that are also part of the services industry)	6.6	Wales: 8.9 Great Britain: 8.3				
Occupation 2006-2007 (% of all persons in employment)Managers and senior officials	14.6	Wales: 13.2 Great Britain: 15.4	Increase	**2001** 13.1	No marked change	Newport City Council, Key Statistics
Occupation 2006-2007 (% of all persons in employment)Professional occupations	10.2	Wales: 11.5 Great Britain: 13.1		**2001** 10.5	No marked change	Nomisweb Local authority profile for Newport

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
Occupation 2006-2007 (% of all persons in employment)Associate professional and technical	15.2	Wales: 13.2 Great Britain: 14.3	Increase	**2001** 13.1	No marked change	Nomisweb Local authority profile for Newport
Occupation 2006-2007 (% of all persons in employment)Administrative and secretarial	8.9	Wales: 11.2 Great Britain: 11.9	Decrease	**2001** 13.6		Nomisweb Local authority profile for Newport
Occupation 2006-2007 (% of all persons in employment)Skilled trades	9.5	Wales: 12.7 Great Britain: 10.8	Decrease	**2001** 10.6	No marked change	Nomisweb Local authority profile for Newport
Occupation 2006-2007 (% of all persons in employment)Personal services	7.6	Wales: 9.1 Great Britain: 8.1	Increase	**2001** 6.6	No marked change	Nomisweb Local authority profile for Newport
Occupation 2006-2007 (% of all persons in employment)Sales and customer services	9.1	Wales: 8.1 Great Britain: 7.6	Increase	**2001** 8.7	No marked change	Nomisweb Local authority profile for Newport

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
Occupation 2006- 2007 (% of all persons in employment)Process plant and machine operatives	9.3	Wales: 8.8 Great Britain: 7.1	Decrease	**2001** 9.7	No marked change	Nomisweb Local authority profile for Newport
Occupation 2001 (% of all persons in employment)Elementary occupations	15.0	Wales: 12.0 Great Britain: 11.4	Increase	**2001** 14.2	No marked change	Nomisweb Local authority profile for Newport

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
Occupational Classification by Ethnic Group 						
Total JSA claimants (March 2008) All people	3.1	Wales: 2.4 Great Britain: 2.2			Newport has a high proportion (3.1% of working age pop 2008) of people claiming Job Seekers Allowance, compared to Wales	Nomisweb Local authority profile for Newport

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
Total JSA claimants (March 2008) Males	4.6	Wales: 3.4 Great Britain: 3.1			(2.4%) and Great Britain (2.2%).	Nomisweb Local authority profile for Newport
Total JSA claimants (March 2008) Females	1.4	Wales: 1.2 Great Britain: 1.2				Nomisweb Local authority profile for Newport
Working age client group key benefit claimants (May 2007) Total claimants (% proportion of resident working age people)	19.2	Wales: 18.8 Great Britain: 14.2			Compared to Great Britain, Newport has a high proportion of people claiming benefits (19.2% compared to 14.2% of resident working age population 2007). However, this figure is similar to the Wales average of 18.8%. The highest proportion of the total benefits claimed is incapacity benefit at 9.9%. This is higher than Great Britain (7.2%) but lower than the Welsh average (11.0%)	Nomisweb Local authority profile for Newport

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
Working age client group key benefit claimants (May 2007) Job Seekers	2.9	Wales: 2.2 Great Britain: 2.3				Nomisweb Local authority profile for Newport
Working age client group key benefit claimants (May 2007) Incapacity benefits	9.9	Wales: 11.0 Great Britain: 7.2				Nomisweb Local authority profile for Newport
Working age client group key benefit claimants (May 2007) Lone parents	3.0	Wales: 2.2 Great Britain:2.1				Nomisweb Local authority profile for Newport
Working age client group key benefit claimants (May 2007) Carers	1.4	Wales: 1.4 Great Britain:1.0				Nomisweb Local authority profile for Newport

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
Working age client group key benefit claimants (May 2007) Others on income related benefits	0.5	Wales: 0.4 Great Britain:0.5				Nomisweb Local authority profile for Newport
Working age client group key benefit claimants (May 2007) Disabled	1.2	Wales: 1.3 Great Britain:0.9				Nomisweb Local authority profile for Newport
Working age client group key benefit claimants (May 2007) Bereaved	0.3	Wales: 0.3 Great Britain:0.3				Nomisweb Local authority profile for Newport
Note: Qualifications Level 1 = 1+ GCSE, NVQ level 1 or equivalent Level 2 = 5+ GCSE's, NVQ level 2 or equivalent Level 3 = 2+ A levels, NVQ level 3 or equivalent Level 4/5 = First degree, higher degree, NVQ level 4/5 or professional qualification						

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
% of persons aged 16 -74						
2001 No qualification	33.6	England and Wales: 29.1 Wales: 33.0				
2001 Highest qualification – level 1	16.3	England and Wales: 16.8 Wales: 15.5				
2001 Highest qualification – level 2	19.9	England and Wales: 19.4 Wales: 19.8				

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
2001 Highest qualification – level 3	6.1	England and Wales: 8.3 Wales: 7.1				
2001 Highest qualification – level 4/5	16.8	England and Wales: 19.8 Wales: 17.4				
2001 Other qualification	7.4	England and Wales: 6.9 Wales: 7.2				
2001 Key Stages 1-3	Key stage 1,2 and 3 are among the highest in Wales. 100% of pupils have achieved level 4 at KS2 in Welsh Language.					

Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
Post 16 Education	Attainment at 'A' level is above the Welsh average.			The staying on rate for post-16 education has improved by 3% on the previous year.		Children and Young People's Plan 2008
Key Stage 4				Children and Young People's Plan seeking to address this issue into the future.	Performance does not match the other key stages.	Children and Young People's Plan 2008
Secondary Attendance				Children and Young People's Plan seeking to address this issue into the future.	Secondary attendance is lower and exclusion rates higher than all-Wales averages.	Children and Young People's Plan 2008
VAT registered businesses (2006) % is a proportion of stock (at end of year) Registrations	9.7	Wales: 7.8 Great Britain: 9.4			In 2006, there were more VAT registrations for businesses (9.7% as a proportion of stock at the end of the year) than deregistrations (8.2%) indicating a growth in local business. This compares to the the registrations in	Nomisweb Local authority profile for Newport
VAT registered businesses (2006) % is a proportion of stock (at end of year) Deregistrations	8.2	Wales: 6.3 Great Britain: 7.4				Nomisweb Local authority profile for Newport

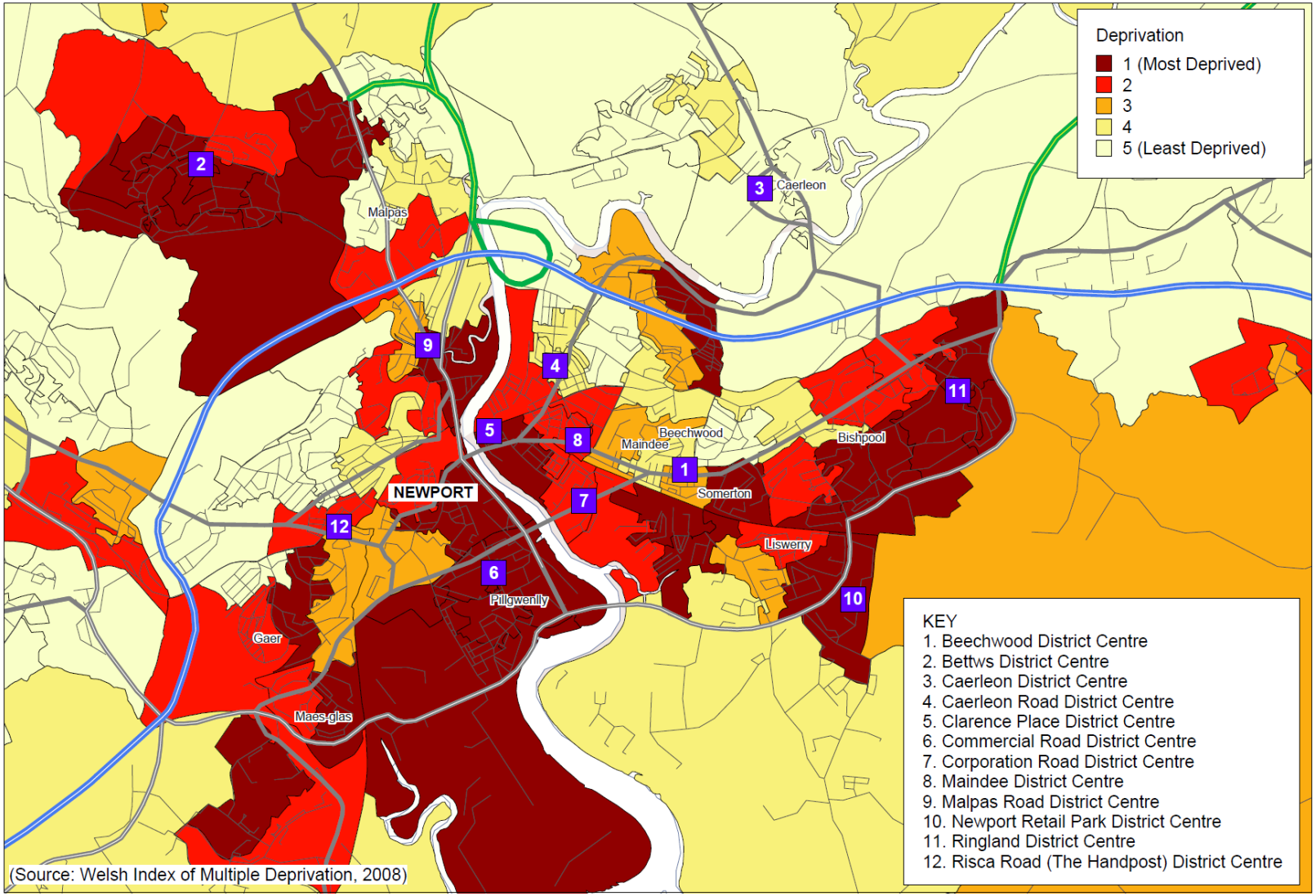
Indicator	Quantified data (Newport)	Comparators (Quantified data for South Wales and Wales/England)	Targets	Trends	Issue identified	Source
VAT registered businesses (2006) % is a proportion of stock (at end of year) Stock (at end of year)	3,035				Wales (7.8%) and Great Britain (9.4%) who show lower registrations, but also fewer deregistrations (6.3% and 7.4% respectively). The stock in Newport at the end of 2006 was 3,035.	Nomisweb Local authority profile for Newport

A.4.13 Vitality and Viability

Table A.21 - Vitality and Viability of District Centres (excluding Newport Retail Park) (source: Colliers International, Newport Retail Study July 2010)

Vitality and Viability	District Centre	Socio-Demographics of Local Population	Layout and Configuration	Key Retailers/Anchors
Good Vitality & Viability	Maindee	Mainly least deprived	Linear, vehicular street	Boots, Somerfield, Peacocks
	Caerleon Road	Least deprived	Linear, vehicular street	Boots
Average Vitality and Viability	Corporation Road	Mainly most deprived	Linear, vehicular street	
	Risca Road (the Handpost)	Mainly most deprived	Linear, vehicular street	Cost Cutter
	Caerleon	Least deprived	Vehicular street, dual node (High Street and Station Road)	Spar
	Malpas Road	Mainly most deprived	Vehicular street, including Discovery Park retail warehouses	Aldi, Wickes
	Beechwood	Mainly least deprived	Linear, vehicular street	Spar
Poor Vitality & Viability	Commercial Road	Most deprived	Linear, vehicular street	Asda
	Bettws	Most deprived	Purpose built	Spar
	Ringland	Most deprived	Purpose built	Cost Cutter
	Clarence Place	Mainly most deprived	Linear, vehicular street	Iceland

Figure A.17 - Location of District Centres in Newport City and Deprivation by Local Area SOURCE: Newport Retail Study July 2010



Appendix B - Stage A Consultation Responses

B.1 Results of the Consultation Workshop

Table B.1 - Results of the Consultation Workshop: 1st July 2008

Consultation Comment	Response	Action
STAKEHOLDER WORKSHOP 1ST July 2008		
Plans and Programmes/ Data sources		
European Physical Activity	Agreed	Information added where appropriate
Wales Education Plan	The Plan 'An Education and Training Action Plan for Wales' was published in 1999 and is therefore considered to be out of date for the purposes of the SA	No further Action
Fisheries Directive	Agreed	Added to tables 2.1 and 2.2
EA documents include – ▪ RCFMP – 2 for Newport (Usk and Wye Easter Valleys) ▪ Catchment Abstraction Management ▪ River Basin Management Plan – Water Framework Directive compliant document (this includes water quality and targets for the Severn Estuary and should be available in final form within 12 months) ▪ Shoreline Management Plan ▪ Severn Estuary Management Plan	▪ Cannot locate through the internet ▪ Cannot locate through the internet ▪ Cannot locate through the internet ▪ Noted	▪ Awaiting data from Council where available ▪ Awaiting data from Council where available ▪ Awaiting data from Council where available ▪ Severn Estuary Shoreline Management Plan added to PP review
Clinical Futures – health perspectives	Cannot locate through the internet	Awaiting data from Council where available
Llanwern SPG	This has not yet been published	To be reviewed upon publication
Newport train station SPG	This has not yet been published	To be reviewed upon

Consultation Comment	Response	Action
		publication
Sustainability SPG	This has not yet been published	To be reviewed upon publication
Maesglas Newport SPG	This has not yet been published	To be reviewed upon publication
Community Safety Strategic Assessment – plan is in final stages and is available through the Police. Newport Community Safety Partnership Plan 2008-2011 subsequently received from the Council.	Agree that data should be added	Document reviewed and data added to baseline, issues and SA Framework
Torfaen and Cardiff Development Plans	Agreed.	Added to PP Review
SPG Crindau and Whitehead	This has not yet been published	To be reviewed upon publication
Play strategy	Cannot locate through the internet	Awaiting data from Council where available
Children and Young Peoples Plan no longer draft (Targets)	Cannot locate final version through the internet	Awaiting targets from Council where available
New Framework Directive on Waste	Cannot locate through the internet	Awaiting data from Council where available
Local Area Partnership on Physical Activity (includes Sports Council for Wales)	Details of this have not yet been published	To be reviewed upon publication
Landmap methodology to be used as an evidence base to identify special landscape areas. www.ccw.gov.uk/landmap	Data for Newport is not available on the Landmap website	Awaiting data from Council where available
South East Wales Biodiversity Records Centre www.sewbrec.org.uk	The data already contained in the report is regarded as sufficient for the purposes of SA.	No further action

Consultation Comment	Response	Action
Sewtra Transport plan	Agreed	Added to PP review
Coastal Access plan	Cannot locate through the internet	Awaiting data from Council where available
Management document for trees (currently a draft)	Cannot locate through the internet	Awaiting data from Council where available
Council Transport Plan	Newport City Council does not have a Local Transport Plan, and the provisions for Transport Policy are provided through the UDP.	No further action
40 Walks initiative	Cannot locate through the internet	Awaiting data from Council where available
It was also suggested that documents/data are found on Crime and Disorder and light pollution. Data on light pollution subsequently received from the council including: ▪ Guidance notes for the reduction of obtrusive light ▪ Domestic Security Lighting Friend or Foe ▪ Statutory Nuisance from Insects and Artificial Light ▪ Environmental Protection UK: Light Pollution	Crime and Disorder- see community safety strategy (above) Lighting: SA does not require this level of detailed assessment	No further action
Data can be obtained from Mike Jones at the Council (01633 232494) on housing renovations and general housing data.	Agreed	Mike Jones to be contacted
More up to date population data available at: http://new.wales.gov.uk/topics/statistics/headlines/pop2008/hdw20080630/?lang=en	Agreed	Added to baseline.
Towards a strategy for the Gwent Levels into the next Millennium, a consultation document (CCW)	Cannot locate through the internet (hard copy only)	CCW sending copy in the post

Consultation Comment	Response	Action
Nature conservation and physical developments on the Gwent Levels the current and future implications (CCW)	Cannot locate through the internet (hard copy only)	CCW sending copy in the post
Core Management Plan including conservation objectives for the River Usk SAC 7th March 2008 available from CCW website	It is considered that this document is more appropriate for the HRA parallel process	Include within HRA
Advice from the Council: The Severn Estuary Partnership has some publications that may be of some use. And the two most useful links from that page would be Strategy, guidance notes and workshop reports. Reports subsequently downloaded were: 1. The Severn Estuary Strategy 2. 'Estuary Workshop' for river basin planning, Severn River Basin District Post Workshop (Cardiff) Report Draft 3. The Habitats and Species of the Severn Estuary A Basic Introduction for Developers and Decision Makers (2006) 4. The Archaeology of the Severn Estuary A Guide for Planners, Developers, Decision Makers and Local Communities (2006) 5. Promoting Local Produce: Innovative ways to conserve and enhance the cherished landscapes and habitats of the Severn Estuary and levels (2006)	1. Agreed 2. Agreed 3. Agreed 4. The Scoping Report and Appendices already contain sufficient data in relation to archaeology. 5. Agreed	1. Data added to Key Issues and Opportunities Table. 2. Data added to Key Issues and Opportunities Table and Appendix A. 3. Data added to Appendix A 4. No further Action 5. Data added to key issues table and SA Framework
The Rights of Way Improvement Plan	The Draft Rights of Way Improvement Plan is already included within Table 2.1 of the Scoping Report	No further action
Data received from Council Leisure Department following the workshop: ▪ Planning for Sport in Growth & Regeneration Areas Planning Bulletin 20 | February 2008 ▪ White Paper on Sport, Sport Governance in Europe Report White Paper Consultation, Accompanying document and Frequently Asked Questions	Noted	

Consultation Comment	Response	Action
▪ Sport Playing Its Part: - The Contribution of Sport to Meeting the Needs of Children and Young People - The Contribution of Sport to Economic Vitality and Workforce Development - The Contribution of Sport to Healthier Communities - The Contribution of Sport to Building Safe, Strong and Sustainable Communities		
Issues		
Environmental education should be included as it underpins all of the objectives in the SA.	It is not the role of the LDP to further environmental education	No further action
Is there a renewable energy section? Normally have one in an LDP, could be reflected in the SA.	Renewable energy is addressed in the SA Framework	No further action
Will the Severn Barrage be included?	The Severn Barrage will be included if and when proposals are confirmed	Detail to be added when necessary
Access to IT resources is considered an important aspect, and should be considered as such in the SA.	Agree	Indicator added to SA Framework under objective 25
Although the Sustrans cycle route is recognised, it was considered important to link residential areas via cycle routes.	This is already addressed within the SA Framework indicators under objective 26	No further action
Crime and Fear of Crime ▪ There are a number of alcohol exclusion zones in existence and proposed around the City and its environs. There was a suggestion that there should be promoted as safety zones together with key public transport corridors, linked to s106 monies as areas prioritised for action (CCTV, improved surveillance and lighting etc.)	Agreed that data should be included	Document reviewed and data added to baseline, issues and SA Framework

Consultation Comment	Response	Action
▪ Anti-social behaviour statistics are available at some considerable level of detail and could be mapped – Steve Davison (Community Warden) and Richard Winfield were referenced. ▪ Newport Community Safety Partnership Plan 2008-2011 subsequently received from the Council.		
Cultural Heritage ▪ It was felt that this is not adequately reflected in the framework – reference could be made to the Chartist Movement (Lucy has details) and other popular elements of culture including bands and gigs. ▪ Lack of valuable heritage integration and interpretation into schemes for development. GGAT representative put forward a case for supporting much greater use of the historic environment as a catalyst/theme/driver for development and expressed a strong desire, supported by others, to halt the decline of many historic buildings (grand and background in character) into dilapidation through pro-active encouragement of re-use	Agreed	Added to Issues table
Physical Activity There were noted to be issues with open space provision at WARD level that may be masked by overall average statistics. It was requested that the statistics are supported by maps that identify the spatial distribution of open space and highlight where deficits exist, which may not necessarily be picked up in the overall stats	Noted. Disparities in provision have been picked up within the baseline description.	No further action.
Gypsies and travellers There is an identified need to provide a gypsy and traveller site in Newport; however, there is political opposition to this. Police officer suggested that there are up to 9 families that have very strong ties to Newport, but are forced to move around – apparently they would very much welcome a permanent base. Lucy is taking this up further with additional consultation	Agreed	Added to issues table
Households and Housing ▪ Threat of Stock Transfer: it was noted that by the time the LDP is adopted, all stock will have been transferred so some of these issues will be replaced with others (demolition/management of RSLs/quality control on accommodation etc.)	Agreed	Added to issues table

Consultation Comment	Response	Action
▪ reference was made to the need to support the delivery of 'extra-car' housing and sheltered accommodation		
Economic Migration ▪ This is resulting in social exclusion, altering cultural norms and creating enclaves of very different character that need to be addressed to promote inclusiveness. ▪ Cultural expectations differ between groups (Iraqis, Iranians and Poles were all referenced)	There is no evidence within the public realm to suggest that this is the case	No further action
Employment Growth ▪ Inward investment is NOT an issue nor is Land Availability for Employment. ▪ Provision of executive housing is a barrier to inward investment as well as good schools- need to attract higher level workers.	The Newport City Council website suggests that inward investment is high. Evidence needed with regards to land availability (data gap) There is no evidence within the public realm to suggest that this is the case.	Issues table modified. Awaiting data with regards to land available for employment. Perceived need added to issues table
Employment, Skills and Training ▪ Learning, training and employment should be viewed as a continuum. ▪ Skills deficiency 14-19 learning pathways- how does it fit in? (add 14-19 Plan) ▪ Need to consider aspects of education other than academic achievement- different targets needed? different indicators and a wider skills base ▪ Skills Shortage – need to up skill away from traditional industries. Post-18 skills problem- education system at present encouraged the wrong sorts of careers? shortage of people with childcare qualifications etc ▪ Work based learning can provide increase in skills ▪ Newport now is on the 3rd generation of people who have NEVER worked- one problem is trying to get them to understand that they should be working. One way to do this is to get the young people on board.	Agree The SA objective to address skills and education addresses the aims of this strategy Agree The SA Framework includes indicators that address this issue The SA Framework includes indicators that address this issue To be checked	The nature of the SA Framework will ensure that all the elements of sustainability are considered together in the assessment of the plan. No further action Additional indicators added to SA Framework No further action No further action Awaiting data from Council where available
Travel to Work and Unemployment ▪ Travel to work is ok if you have a car. There has been an increase in car use,	There is no evidence to suggest that this is the case within the public	No further action Awaiting data from Council

Consultation Comment	Response	Action
and bus provision (ie 2 buses instead of 1) has decreased. ▪ This affects employment as accessibility from the more deprived areas (see 'Communities Next') – people won't try to find employment if it is located too far away (ie two buses). Links to poorer areas are infrequent as well as disjointed. ▪ Need to strategically place employment alongside improving the transport network. ▪ The train from Cardiff to Newport goes past communities that require transport solutions, but doesn't stop in these locations (no stations) eg the Junction 28 developments. This is addressed in the current UDP and SEWTA to be carried out in 2013 alongside other schemes such as the Western Valley ▪ Public transport- should there be a separate objective for within Newport to access to/from outside Newport? ▪ Expenses- get paid LESS per miles for more efficient vehicles or motorcycles (and nothing for bicycle use) encouraging inefficient car use!!! ▪ Need to promote cycle to work? better distribution of cycle network, showers and facilities in offices etc. ▪ Not possible to reduce the need to travel? Will people always drive to work? ▪ Reduced car use is linked to the fear of crime- people drive to the supermarket for safety reasons	realm. To be checked To be checked Noted To be checked This is not an issue that can be addressed by the LDP The SA Framework already addresses this issue The SA Framework will seek to reduce the need to travel in line with government guidance and the need to reduce greenhouse gases There is no evidence within the public realm to suggest that this is the case.	where available Awaiting data from Council where available To be considered in stage B (future implications) Awaiting data from Council where available
Unemployment and Childcare ▪ The plan area has a shortage of affordable, good quality childcare. Workplaces should include them as part of development (and other developments too including housing). Expensive and inconvenient childcare is a contributing factor to low employment rates. Not even just for low paid employment, but for higher level jobs too. Issue with change of use of premised to nurseries- do we want nurseries to be located on industrial sites? (no policy in UDP) only if within the workplace? or childrens' activity centres- supervised and closed access. ▪ Flexible working can contribute to helping ease traffic congestions and employment issues relating to childcare arrangements.	The most recent data that could be found to be available was at http://www.newport-childcare.com/ from which the plan is dated 2000-2001. This is considered to be out of date and so will not be used. It is not the role of the LDP to control internal business practice	Awaiting data from Council where available No further action
Primary Schools	The Single Education Plan 2006-	No further action

Consultation Comment	Response	Action
▪ Up to 2026- only authority in Wales- high demand for primary places (increase) ▪ 16% of primary children are from BME communities; 31 languages are spoken in Pill primary school (see the Needs Assessment)	2008 identifies that the majority of primary schools have a surplus capacity. It has not been possible to find data that supports the workshop comment to be checked	Awaiting data from Council where available
Tourism, Profile and Mix of Uses ▪ Inward investment- need to encourage retention of graduates through improving the attractiveness of the city through provision of housing and careers. ▪ Also, need to improve the PROFILE of the city through the university, R&D, and business in the area. Newport should market its attractions more IMAGE AND PERCEPTION –when people come, they're surprised at how nice it is- Newport don't sell themselves well. Newport has a beautiful town centre- Victorian because growth happened later here so wasn't bulldozed. ▪ Don't focus on the Ryder Cup- benefits to infrastructure have already been implemented. ▪ Need to encourage NEW uses in buildings that are no longer suitable for offices. More of a mix including night time uses and flats with shops including high value shops and boutiques. There are limited places to go for lunch close to areas of employment (including the council offices) ▪ Leisure activities should also be encouraged. Visitors come for one thing and there is nothing else for them to do- need a range. ▪ Need to enhance Newport's environmental assets including the canal and other water assets.	Availability of relevant strategies to be checked Availability of relevant strategies to be checked Agreed Availability of relevant strategies to be checked see leisure strategies above Agreed	Awaiting data from Council where available Awaiting data from Council where available Ryder Cup deleted from issues table. Availability of relevant strategies to be checked no further action Data added to Issues table and SA Framework
Sports Tourism ▪ Newport Rugby is known across the world; Olympics and Velodrome for training? Caerleon and shopping links etc need to be promoted to retain visitors- Separate Opportunity?	Availability of relevant strategies to be checked Data about Rodney Parade to be added	Awaiting data from Council where available Data added to Key Sustainability Issues and

Consultation Comment	Response	Action
▪ (Data from Newport City Council Website- link to Sports Tourism (below): *Major plans have been put forward to build a new £40 million state-of-the-art stadium on the site of Rodney Parade. The 15,000 capacity stadium will be home to Newport RFC and the Newport Gwent Dragons and will ensure the future of rugby in Newport remains in the heart of the city.*) ▪ Need inward investments in hotels and small businesses- using Welsh businesses for Olympics development	Availability of relevant strategies to be checked	Opportunities Table Awaiting data from Council where available
Retail ▪ Rodney Parade is to be redeveloped with a new brand – this will alter the character, distinctiveness and image of retailing in the City Centre ▪ The new shopping centre should be completed by 2010/2011 and the impacts on the city centre are therefore yet to be evident. There is already 70% pre let floorspace in the city centre, however, some of these are existing shops moving to the new (and considered better and higher profile) premises. *Older Buildings and Regeneration* ▪ Retailers don't want to use the older buildings as they are too expensive to maintain. Need to make it cheaper for investors to use and regenerate older buildings to create a level playing field. Lots of the older buildings can't meet current building regs such as access for disabled people so aren't suitable. Units becoming homogenised- don't want this	The Rodney Parade development links to the development of Sports Tourism agreed Availability of relevant strategies to be checked	Sports Tourism Considered above The Newport Unlimited led regeneration has been included within the PPP review. The vitality and viability of centres is included within the SA Framework. Data not available at this time
SA Framework		
Objective 1		
Group 1 ▪ Suggestion that population living within countryside areas is not an appropriate indicator as 70% of Newport is designated as countryside. ▪ Suggestion to include statistics from '40 walks scheme' and uptake of guided walks	agreed agreed	Indicator removed Indicator added
Group 2 ▪ add in reference to the existence of countryside management schemes and	agreed	indicator added

Consultation Comment	Response	Action
enforcement ▪ add in reference to interpretation- the existence and quality	agreed	indicator added
Group 3 ▪ Suggestion to merge objectives 1 and 2 to read 'protect and enhance existing valued landscape character and encourage it's sustainable use, enjoyment and management' ▪ Suggestion of removal of indicator to measure population living within walking distance of countryside areas as this may encourage greenfield development ▪ Suggested addition of indicator to measure access to the Rights of Way Network and its use and connectivity as this has been an issue in the Celtic Manor Resort.	agreed agreed agreed	Objectives merged Indicator removed Indicator added
Objective 2		
Group 1 ▪ Question over what is meant by landscape- does it infer both rural and urban? If so, the indicators should reflect this.	Agreed	Indicators modified
Group 2 ▪ request that the assessment rationale include a clear definition of 'valued' in this context ▪ requested removal of character as it was felt to confuse the issue ▪ suggested addition of reference to open spaces to broaden this objective to cover all valued spaces Additional Indicators: ▪ Amount of valued open space lost to development ▪ Total area of valued open space ▪ Amount or proportion of landscape subject to enhancement ▪ Proportion of valued landscape lost to development	agreed agreed agreed agreed	to be completed 'character' removed. added to objective Indicators added

Consultation Comment	Response	Action
Group 3 ▪ Suggestion of merge with objective 1 (see above) ▪ Suggested removal of 'area of derelict land outside urban boundaries improved' as it is not considered an issue as there is not a lot of it.	agreed agreed	see above indicator removed
Objective 3		
Group 1 ▪ Education is key for this objective ▪ Population change of protected species- change to 'size increase' not 'change' ▪ Planning applications- suggestion that this implies that bad decision making is happening- delete indicator? ▪ LBAP targets should be used.	Agreed. However, environmental education is not the role of the SA or the LDP. agreed LBAP targets currently being updated within the council	no further action indicator modified LBAP targets to be added when they've been updated.
Group 2 Change indicator to: ▪ The area of land affected by planning applications approved that lead to loss of species, habitats of important biodiversity value Add: ▪ Area of land enhanced for biodiversity value through the use of s106 agreements	agreed agreed	indicator modified indicator added
Group 3 ▪ add new indicator to address brownfield land importance for biodiversity ▪ specifically include reference to land and aquatic habitats ▪ Use BAP targets to ensure consistency	It is thought that important biodiversity present on brownfield land will be covered under important habitat lost to other uses. agreed	no further action LBAP targets to be added when they've been updated.
Objective 4		

Consultation Comment	Response	Action
Group 1 ▪ Suggestion that the objective is too vague and open to interpretation	agreed	Objectives 4 and 5 merged
Group 2 ▪ Request made for a very strong rationale setting out what is meant – suggested it should encompass local sourcing of material Indicators: ▪ Add in a measure about local sourcing of materials ▪ Add in a measure about reuse of reclaimed materials	agreed	Indicators added
Group 3 ▪ Suggestion of merging objectives 4 and 5 as the need to make efficient use of land concurs with the need to protect soil quality. Change objective to read 'To ensure efficient use of land and protect geodiversity, soil quality and mineral resources'. ▪ It was discussed that the objective to encourage high density developments will increase social problems and should be deleted. ▪ The differentiation between contaminated and derelict land should be specified and only one indicator included where there is an issue.	agreed Noted. However, it is national policy to encourage higher density developments in order to improve environmental efficiency and access to facilities and services. Agreed	Objectives merged No further action Amount of derelict land deleted
Objective 5		
Group 1 ▪ Protect/manage not enhance? ▪ question about whether there is a dataset available for agricultural land	Agreed that the protection of soils is necessary as enhancement is not possible through the LDP. To be checked	Changed to 'protect' Awaiting data from council where available
Group 2 ▪ To <u>protect and</u> enhance geodiversity in the County Borough , including soil resources and their quality ▪ Suggestion that contaminated land indicator should be removed as it is	It is agreed that protection is necessary, but that enhancement is not the role of the LDP. Agreed	Changed to 'protect' The area of contaminated land indicator has been removed, but the remediation of contaminated land retained.

Consultation Comment	Response	Action
addressed elsewhere ▪ ALC should be 3A to reflect the definition of best and most versatile agricultural land	Agreed	Indicator modified
Group 3 ▪ Merge objectives 4 and 5 (see above) ▪ Suggestion to contact the contaminated land officers for indicators.	agreed ongoing	Objectives 4 and 5 merged Discussions with council are ongoing
Objective 6		
Group 1 ▪ Specific targets necessary	Agreed	Awaiting locally specific data from Council where available
Group 2 ▪ Change to 'To improve air quality'- removed the first part as felt it was addressed by other objectives (insofar as when you link it to the actual types of policies that score well against this, there would be too much repetition with others) ▪ the EA representative – John Goldsworthy – suggested that the EA holds more data on this and indicated that he would pass some through to NCC	Agreed To be checked	Objective modified Awaiting EA pack
Group 3 ▪ Suggest merging of objectives 6 and 7 as greenhouse gases will be minimised through other objectives. ▪ Suggested need for local emissions to be addressed the local level, as the emissions from the M4 can't be controlled.	Noted. However, the differences in effects of policies mean that this is not possible. Agreed	No further action Additional indicator to cover local emission mitigation added.
Objective 7		
Group 1	To be checked	To be included upon

Consultation Comment	Response	Action
▪ There are Defra propositions on emissions which are soon to be developed in Wales		publication
Group 2 ▪ Suggestion that this is broadened to cover other gases as well ▪ Add in an indicator related to BREEAM ▪ Add in an indicator related to Code for Sustainable Homes	Noted. However, it is considered that the objective should address the priorities for action only agreed agreed post-meeting note – this will become mandatory in Wales from April 2009 – announced by Jane Davidson 03.07.08	No further action BREEAM indicator added CSH indicator added
Group 3 ▪ Suggest merging of objectives 6 and 7	Noted. However, the differences in effects of policies mean that this is not possible.	
Objective 8		
Group 1 None	n/a	n/a
Group 2 ▪ Suggestion that this should be split to recognise the difference between the SOURCES of noise pollution and RESPONDING TO THE EFFECTS in the same vein as other objectives – the licensing team have subsequently sent through the following suggestions for the SA Framework: **SA Objective:** To minimise the effect of noise on residential occupiers **Potential Indicators:** ▪ No. of residential permissions granted in TAN 11 Category C and D locations (target: nil) ▪ No. of permissions granted where plant and equipment forming part of the		

Consultation Comment	Response	Action
development results in rating levels of noise from the plant and equipment exceeding 5 dB at residential accommodation (assessed in accordance with BS4142) (target: nil) ▪ No. of permissions granted where commercial development will create noise and disturbance that will have a detrimental affect on the amenities of nearby residential occupiers (target: nil) **SA Objective:** To protect quiet areas in the authority **Potential Indicator:** No. of areas recorded as "quiet" and requiring protection in line with the Environmental Noise Directive (2002/49/EC) (No target identified)		
Group 3 ▪ Suggest addition of indicator: 'distance of noisy uses away from residential areas'	Noted. The current indicator addresses this point	No further action
Objective 9		
Group 1 ▪ Is it necessary to improve AND enhance? They both mean the same thing? Maybe maintain should be added here instead. ▪ Remove nitrate and phosphate indicators as will be covered under biological and chemical indicators	Agreed Agreed	Objective changed to maintain and where possible enhance indicators removed
Group 2 None	n/a	n/a
Group 3 Remove following indicators: ▪ Extent and quality of source protection areas- as will be encompasses within groundwater quality (EA rep) ▪ Nitrate and phosphate levels- as will be covered under chemistry and biology ▪ Move water abstractions to become an indicator for objective 10	Agreed	Indicators removed

Consultation Comment	Response	Action
Objective 10		
Group 2 ▪ Add in an indicator linked to the relevant part of BREEAM ▪ Add in an indicator linked to the relevant part of Code ▪	Agreed	Indicators added
Group 3 ▪ Add water abstractions as an indicators	Agreed	Indicator added
Objective 11		
Group 1 ▪ Could use statistics relating to people signing up to schemes. Also look into Water Conservancy Council ▪ Existing or Future properties at risk? Is the key to manage? ▪ Could add infrastructure statistics?	To be checked	Awaiting data from Council where available
Group 2 Indicators: ▪ Removal of 'highly sensitive' to broaden the application of the objective to cover ALL development ▪ Add 'where appropriate' to SUDS schemes- suggestion made by EA representative on the basis that not all sites will be suitable for SuDS ▪ Suggest addition of an indicator related to the implementation (and effectiveness?) of flood remediation schemes	Agreed Agreed Agreed	Removal of words Words added Indicator added
Group 3 ▪ Need to look at high level target report for flooding ▪ Suggest inclusion of indicator to measure flood mitigation works.	To be checked	Awaiting data from Council where available

Consultation Comment	Response	Action
Objective 12		
Group 1 ▪ Commercial targets for energy efficiency? include BREEAM ▪ Is there a way of assessing retrofitting?	Agreed Discussions regarding potential indicator are ongoing	Indicator added To be added once agreed with Council
Group 2 Split objective into 2 since renewable energy and energy efficiency do not have to necessarily be linked and you can achieve one without the other: ▪ Increase energy efficiency; ▪ Promote renewable energy production and use Add indicators under energy efficiency: ▪ Add in an indicator linked to BREEAM ▪ Add in an indicator linked to Code	Agreed Agreed	Objective split Indicator added
Group 3 ▪ Need to ensure that people don't demolish or remove materials that function in favour of more 'efficient' ones, which will waste embedded energy. ▪ Target of 30% to be checked ▪ SAP rating indicator to be applied to <u>new</u> housing	Noted, however it is determined that an objective to ensure energy efficiency will include this matter To be checked Agreed	No further action Awaiting data from Council where available Indicator modified
Objective 13		
Group 1 ▪ Check targets for inconsistencies	The final Regional Waste Plan 1st Review document will be published in 2008 after taking into account the feedback received during the consultation period	Data to be added when revision is published
Group 2 ▪ All targets need to reflect the regional waste plan	The final Regional Waste Plan 1st Review document will be published in 2008 after taking into account the	Data to be added when revision is published

Consultation Comment	Response	Action
	feedback received during the consultation period	
Group 3 ▪ The regional waste plan should be checked and compared to the objective, indicators and targets. They should seek to be proactive rather than reactive, which could potentially be achieved through education.	The final Regional Waste Plan 1st Review document will be published in 2008 after taking into account the feedback received during the consultation period	Data to be added when revision is published
Objective 14		
Group 1 ▪ Suggest deletion of 'new' to encompass retrofitting as current stock is seen as main issue. ▪ Concern over whether or not Ecohomes standard will still be in place in Wales over time- possibility of a welsh/Newport specific standard?	Agreed Noted	'New' deleted from the objective New standards to be added as and when they are published
Group 2 ▪ suggested deletion of 'new' to broaden the applicability to ALL development Indicators ▪ % of development with a design statement submitted ▪ Indicator relating to major scheme utilising the services of DCfW ▪ Add in an indicator about secured by design	Agreed Agreed	'New' deleted from the objective Indicators added
Group 3 ▪ Delete the word 'new' to encompass all development. ▪ Add WAG target that all buildings are to be zero carbon by 2011.	Agreed Agreed	'New' deleted from the objective Target and new indicator added to framework to reflect the WAG definition of 'zero carbon', which is the Code for Sustainable Homes Level 6.

Consultation Comment	Response	Action
Objective 15		
Group 1 ▪ Ambiguous- question over the meaning of the word 'opportunity' ▪ Indicator- add per capita income? or indicators focussing on ethnic minorities and the elderly.	Opportunity is considered an adequate word in this context Noted. The indicators provided are considered to be sufficient.	No further action
Group 2 ▪ Change to: 'improve equality of opportunities amongst all social groups' ▪ Group felt that the phrasing confused the issues being considered here – suggested a stronger focus on equality of opportunities, with a rationale referencing accessibility of education (in terms of being accepted on a course, and physically accessing a course venue); DDA compliance of buildings; reference to incapacity etc. Target should be on improving the poorest areas.	Agreed Agreed	Objective modified Detail added to assessment rationale
Group 3 ▪ Suggestion that the objective is addressed within the other objectives and so is unnecessary here. The indicators may therefore be more appropriate under economic objectives. ▪ Query over the definition of 'poverty'- suggestion that rich people living in areas with no services are in poverty	Noted, however it is considered that deprivation is a key issue in some areas of the plan area and thus should retain its own objective. Poverty is defined as 'the state of having little or no money and few or no material possessions' and thus this does not correspond with this comment.	No further action No further action
Objective 16		
Group 1 ▪ Distance to health care facility- accessibility should also be considered ▪ Additional indicator- % of smokers/ local health promotion group will have stats too	Accessibility will be assessed under objective 17 Smoking is not an issue that can be addressed through land use planning	No further action No further action
Group 2	Agreed	Objective shortened

Consultation Comment	Response	Action
▪ Change to: 'Improve the health and wellbeing of the population'- group felt that the first part of the objective was sufficient and that the themes in the second part were better reflected in the indicators. ▪ Add in indicator about equalities in health ▪ Add in an indicator relating to access to health services ▪ Suggest some reference to nutrition concerns e.g. amount/uptake of allotments/fruit and veg. co-ops ▪ Amount of public open space/conformity to NPFA ▪ Consider adding indicators linked to the senior population	Equalities in health will be covered under the other indicators, as well as under accessibility to health care facilities under objective 17 Accessibility will be assessed under objective 17 Agreed No specific target group is referenced and the indicators relate to all groups	No further action No further action Indicator added No further action
Group 3 ▪ Suggest simplification of objective to 'improve health and wellbeing' ▪ Additional indicator of adult physical activity, details of which should be available in the Local Area Partnership agreement (soon to be published)	Agreed in part- see above Agreed	See above Indicator to be added when LAP published
Objective 17		
Group 1 ▪ Add improve and need to add accessible in to the objective ▪ include formal and informal space ▪ 'local community facilities'- ambiguous?	'Accessibility' is considered to be encompassed within 'affordability' The indicators currently cover formal and informal space It is considered that 'local community facilities' is not an ambiguous statement	Improve added No further action No further action
Group 2 ▪ The group would like to see some reference to provision being linked to quantifiable needs and population growth ▪ Add in a reference to NEAPs and LEAPs	Agreed Agreed	Indicator modified Added to framework
Group 3	'Need' to be checked with council	Awaiting data from Council

Consultation Comment	Response	Action
▪ S106 agreements- there is a need for new large scale facilities, and it was mentioned that Cardiff have an SPG on this that could perhaps be used as an example.		where available
Objective 18		
Group 1 ▪ 'Welsh Housing Quality Standard- Newport standard in the future? ▪ Average earnings- how can this be influenced by the LDP?	Noted. However, the SA must base assessments on existing requirements. The iterative nature of the process will enable any new standards to be integrated into the process as an when they are published. Agreed	No further action Indicator removed
Group 2 ▪ Change to: 'Improve the quantity, quality, variety and affordability of housing' Group requested removal of part of the objective as they felt it complicated the issue, particularly in the absence of a definition of 'decent'. ▪ group requested that some reference was made to the need to ensure that affordable housing is integrated into developments of market housing, not provided in one lump ▪ it was raised that all council housing stock is being disposed and will be moving the RSLs – suggested that the indicator should make reference to the management of the ownership transfer ▪ Welsh Housing Quality: suggested that target was replaced with the WAG target – should ideally be 100% ▪ Delete right to buy indicator- Deleted on the basis that there will be no City Social Housing Stock following the transfer of ownership ▪ Over crowded conditions- discussion ensued indicating that this should be more carefully framed	Agreed Agreed By the time the LDP is adopted this will not be necessary Agreed Agreed Noted	Objective changed added to indicator no further action Target added Indicator deleted Overcrowding indicator deleted under comments from group 3 below.
Group 3	Agreed	Objective changed

Consultation Comment	Response	Action
▪ Change objective to 'improve the quantity, quality, variety and affordability of housing' (delete 'to ensure that everyone has the opportunity to live in a decent home') ▪ Suggest deletion of indicator of people on the housing register as this is not considered indicative as a lot of people use this as an insurance policy and may not actually be in immediate need. ▪ Delete indicator relating to average property price against average earnings- and replace with a suitable indicator to address people in lower income quartiles' ability to buy a house. ▪ Delete indicator relating to right to buy as this will not always be an issue ▪ Delete indicator relating to overcrowding as it is too difficult to quantify as it relates to different definitions including cultural variations and density/size of housing and rooms within.	Agreed Agreed Agreed Agreed	Indicator removed Indicator changed Indicator removed Indicator removed
Objective 19		
Group 1 ▪ Contribute- is this a strong enough word? Implies that the planning system can't do much? ▪ Idea for the plan- use the police as a consultee on planning applications ▪ Secured by design- only applies to public stock (make wider?) ▪ Could use national crime stats and the Gwent Crime and Disorder Group's findings	It is considered that it is not possible for the LDP to 'solve' the problem of crime and disorder, and thus contribute is an appropriate word This is an issue for the LDP It is not within the remit of SA to create new guidance and standards for development. Noted	No further action No further action 'new' removed from indicator to widen the indicator as far as possible. New data added to report following review of community safety strategy.
Group 2 ▪ % of new development that meets the 'secured by design' certification criteria- group felt strongly that this should be broadened to cover ALL development, not just housing. ▪ Add: Proportion of city centre covered by CCTV ▪ Add in a reference to CPED Design	It is not within the remit of SA to create new guidance and standards for development. Agreed To be checked	'new' removed from indicator to widen the indicator as far as possible Added to indicators Awaiting data from council where available

Consultation Comment	Response	Action
Group 3 ▪ Delete 'fear of crime per ward during the day and at night' and '% of public realm with natural surveillance' as these are too subjective to measure. Fear of crime depends on where you are. People from different communities have different expectations about crime levels. Suggest replacement with indicator to measure amount of space provided for young people to go as this will reduce 'yob culture' and reduce the fear of crime.	Agreed that fear of crime is subjective. However, within individual areas, an increase or decrease could still be measured. Agree with addition of extra indicator	Additional indicator added
Objective 20		
Group 1 ▪ Instead of 'conserve'- use 'preserve' and add the word 'protect'? ▪ Put whole objective into the environment section? ▪ All the indicators focus on the built environment, what about the historic rural landscapes (see Gwent Levels). Also, could look at historic parks and the Townscape Heritage Initiative.	It is considered that conserve is a more appropriate word than preserve, as conservation enables the appropriate management of historical sites in order that they can be reused for more modern uses, which is more environmentally beneficial. It is considered that, although the objective would fit suitably within the environment section, it equally fits within the social section as the historic environment is an integral part of culture. Agreed	No further action No further action Gwent Levels added as an indicator
Group 2 ▪ Group felt that indicators should reflect the need to manage, raise awareness, educate people and support interpretation of the historic environment**.** ▪ Conservation Areas - group felt that this is of little value as an indicator ▪ GGAT representative is expected to send through some suggestions for further indicators – this may need following up ▪ Scheduled Ancient Monuments - Group felt that this is of little value as an	Agreed Agreed To be checked Agreed	Indicators added indicator modified to read 'Planning permissions granted against conservation officer recommendations' Awaiting data Indicator removed

Consultation Comment	Response	Action
indicator		
Group 3 ▪ Suggest deletion of 'no of conservation areas' as an indicator and replace with 'application granted permission against conservation officer recommendations'	Agreed	indicator modified to read 'Planning permissions granted against conservation officer recommendations'
Objective 21		
Group 1 ▪ Welsh speakers- concern over relevance to Newport- Objective- add 'identify' alongside 'promote, strengthen and enhance'? ▪ Could liaise with council tourism team for indicators	Agreed To be checked	Objective modified Lynne Richards on 01633 232327 to be contacted
Group 2 ▪ Change to: 'To promote, strengthen and enhance the cultural identity of Newport'- Group felt it important to change this as general consensus was that the cultural identity was linked to the City of Newport as opposed to the historical 'County Borough' (although conceded that this was accurate as a description) ▪ Community Groups registered: group felt that the indicators require strengthening to include reference to participation in activities/membership of groups/reflect cultural strengths (gigs and bands/theatre and the arts etc.)	Agreed Agreed	Objective modified Indicator added
Group 3 ▪ Objective- suggestion that the cultural identity needs to be defined and that the reference to the 'county borough' be removed. ▪ Indicator- add 'number of pupils in welsh medium education'	Agreed Agreed	Objective modified to include identification of cultural identity and county borough reference removed Indicator added
Objective 22		
Group 1 ▪ Is 'local' referring to the geographic location employers or employing local	Local refers to both local employers and the employment of local people	No further action

Consultation Comment	Response	Action
people?		
Group 2 None	n/a	n/a
Group 3 ▪ change tone of indicators to be more positively focused: '% change of economically active'; '% of population employed' ▪ Change average earnings to 'highly skilled jobs' ▪ Possibility of merging 22 and 23 together as 23 was considered to be too narrow in focus	Agreed Noted Noted. However, it is regarded important to keep economic growth and employment separate as they have different influences.	Indicators modified Highly skilled jobs created as indicator No further action
Objective 23		
Group 1 ▪ Possibility of merging objective 23 with objective 22 as it was felt that they covered the same issue.	Noted. However, it is regarded Important to keep economic growth and employment separate as they have different influences.	No further action
Group 2 ▪ Suggest addition of reference to 'diverse' ▪ Add: Mix of employment by sector (%)	Agreed	Added to objective
Group 3 ▪ suggest deletion of all indicators and insertion of 'total number of good quality local jobs created'	Agreed	Indicators changed
Objective 24		
Group 1 ▪ Replace with strengthen, as it implies there is no tourism at all at the moment. ▪ Remove 'towards the Ryder Cup in 2010 and beyond' ▪ Unclear of the meaning of 'tourist days'	Agreed Agreed Tourist days are an indicator used to measure how many days tourists	Objective modified Objective modified No further action

Consultation Comment	Response	Action
	spend in an area	
Group 2 ▪ Change to: 'Establish a strong tourist economy, sensitively capitalising on environmental, heritage, and leisure assets for a greater increase in tourism activity' - remove reference to Ryder Cup as it will already have passed and group felt tourism should have a broader focus ▪ Total number of visitors to attractions in Newport- suggestion that this should be divided and reported by sector ▪ Add in a reference to change in bed space availability ▪ Add in a reference to the type of accommodation available – amount and proportional representation ▪ Lyn Richards was referenced as a contact that should be followed up for this objective	Agreed Noted. This level of detail is not necessary for the SA. Agreed Noted. This level of detail is not necessary for the SA. To be checked	Objective modified in line with above No further action Indicator added No further action Awaiting further data from council where necessary
Group 3 ▪ remove 'for a greater increase in tourism activity towards the Ryder Cup in 2010 and beyond' ▪ Suggestion that perhaps a new objective to address the need to enhance the profile of Newport as a place to work, live and play. A potential indicator would be investment in attracting international events to Newport or attendance at international events in Newport.	Agreed It is determined that enhancing Newport's profile is most important for tourism.	Objective modified in line with above Profile enhancement integrated into objective
Objective 25		
Group 1 ▪ 'Improve' was considered too direct a word compared to all the other objectives which use contribute, establish, support etc. Could use 'contribute' here instead? ▪ Include 'access' to education? ▪ Other indicators could include vocational courses, S106 on education. Also need to consider the retention of students once qualified- educational	Agreed Noted. However, access to education is included under objective 17 Agreed	Objective modified No further action Indicators modified

Consultation Comment	Response	Action
institutions should have this information.		
Group 2 ▪ % increase in adult education courses ▪ Decrease in exclusion rates ▪ Suggest addition of a reference to % completion rate of courses ▪ Suggest add in Welsh Medium reference	Agreed	Indicators modified
Group 3 ▪ It was suggested that the most recent targets and indicators needed to be addressed. ▪ The indicator of pupils attending secondary school was not considered appropriate as it is not optional. ▪ remove 'links with university Wales college' as not considered relevant as there are numerous accessible universities in the area. ▪ Delete 'adult education centres' as this is not necessarily related to employment. Suggested additional indicators: ▪ '% of young people in post-16 education or employment' to address vocational as well as academic qualifications ▪ '% of people with basic skills' or 'take up of the 'Basic Skills Employer Pledge' which is a WAG initiative to enable people to progress within job s through overcoming skills barriers. ▪ '% of people with no qualifications' ▪ 'number of young people who are not in education, training or employment' is a government indicator.	Agreed	Indicators modified
Objective 26		
Group 1	It is considered that is it important to reduce the need for transport ahead	No further action

Consultation Comment	Response	Action
▪ Could be simplified into just promoting sustainable transport	of promoting transport by sustainable modes.	
Group 2 Change objective into TWO: **1. Reducing the need to travel <u>by improving local service provision</u>** Group would like to see indicators that reference the following: ▪ proximity of new development to public transport modes ▪ threshold based indicators for the provision of local services in relation to their catchment ▪ indicators linked to the improvement of LOCAL centres (e.g. post offices, pubs, schools and corner shops) ▪ EMPHASIS IS ON CREATING BUSTLING LOCAL CENTRES THAT SERVE CATCHMENTS AND ENCOURAGE SENSE OF COMMUNITY **2. Promote attractive and viable alternatives to car transport to achieve a modal shift to more sustainable modes of transport, including walking and cycling.** ▪ Include additional reference to implementation of green travel plans	Agreed Agreed	Objectives modified Indicator modified
Group 3 ▪ Suggest rewording to read 'promote attractive and viable alternatives to car transport to reduce the need to travel and to achieve a modal shift to more sustainable modes of transport including walking and cycling' ▪ There was a suggestion that the plan will not be able to reduce the need to travel, and that car use is a complicated issue, which is also linked to the fear of crime as some people travel by car for safety reasons. ▪ The green travel plans indicator should be more specific to include measurement only of those that are considered to be 'good'	See above The LDP should seek to reduce the need to travel wherever possible Agreed	See above See above Indicator modified

Consultation Comment	Response	Action
Objective 27		
Group 1 ▪ Remove 'through expansion of the retail sector'	Agreed	Objective modified
Group 2 ▪ Change to: 'To seek to improve the vitality and viability of the City Centre'- given the changes that the group wish to see to objective 26, it was felt that the focus for this objective could be narrowed to deal exclusively with the City Centre ▪ % change in retail uses- this was felt to be much too narrow in focus. ▪ Footfall counts ▪ GOAD Plan to understand change in retailer representation ▪ Distinctiveness/independent retailer representation ▪ Vacancy rates and % of available floorspace that is vacant	Agreed Agreed Agreed It is not necessary to include as much detail as that represented in the GOAD plans for the purposes of SA Agreed Agreed	Objective modified Indicator removed Indicators added No further action Indicators added Indicators added
Group 3 ▪ suggest deletion of 'through expansion of the retail sector' and additions to read: 'to seek to improve the vitality and viability of the city and district centres' add indicators: ▪ % vacant buildings ▪ change in the mix of uses ▪ change in rental levels per square foot ▪ residents' and visitors' satisfaction with local area and facilities	Agreed Agreed	Objective modified to reflect above similar comments Indicators added

B.2 Scoping Report Consultation

Table B.2 – Scoping Report Consultation Responses

Rep. No.	Name and Organisation/ Department	Summary of Comment *(refer to NCC consultation database for full text)*	Response	Action
36	Cadw	pp72 Obj. 19 Content with overall objective. Request addition of objectives relating to condition of Scheduled Ancient Monuments (SAMs); and objective relating to historic parks and gardens. Request that phrasing of objectives focuses on the scale of likely impacts on the historic environment e.g. 'the no. of monuments/archaeological sites/historic parks and gardens adversely affected by the development plan proposals.	Accept that there is merit in including specific consideration of SAMs and historic parks and gardens in the assessment. Suggest that the correct place for this is as an amplification of Obj. 19 through the addition of indicators, inclusion of all relevant data in the baseline and specific reference within the assessment rationale.	Additional data added to baseline and indicators in Sustainability Appraisal Framework (SAF) under objective 19. Consistency with assessment rationale revised.
36	Cadw	App. A baseline data Ensure data on historic assets is included. Cadw provides data to Council monthly.	Accept.	Data added to baseline and subsequent amendments to SAF made.
124	The National Grid (via WYG)	National Grid does not wish to make any specific representation at this time, but would like to be included in all future consultation.	Noted.	NCC to retain National Grid on consultation list.
126	Gwent Wildlife Trust	Request for inclusion of following within the PPP list: • Agenda 21 • Convention in Biological Diversity • Statement of Principles of Forests • Declaration on Environment and Development • UN Framework Convention on Climate Change	Accept that there is merit in reviewing the appropriateness of including the PPPs highlighted within the PPP list. The determining criteria will be whether they add a new dimension to sustainability themes that can be influenced by planning policy.	PPPs reviewed and added to list. Additions to sustainability themes table made.

Rep. No.	Name and Organisation/ Department	Summary of Comment *(refer to NCC consultation database for full text)*	Response	Action
		Recommend consideration of the following in the PPP review • EU Directive on Environmental Impact Assessment • The Arhus Convention and EU Directive on providing public participation in the drawing up of certain programmes relating to the environment • EU Rural Development Policy • European Common Agricultural Policy (reform 2003) • Renewable Energy Coalition • Intelligent Energy Europe – Community Supports Programme • Environmental Liability Directive (2004/35/CE) • European Employment Strategy • Farming for the Future (Defra) • Section 42 list of Habitats and Species of Principal Importance for the Conservation of Biological Diversity (Wales Biodiversity Partnership 2003) • River Usk Catchment Abstraction Management Strategy (CAMS) Also recommend reference be made to PPPs that are currently in draft form		
126	Gwent Wildlife Trust	Request that the importance of Newport's ecological heritage is featured as a characteristic of the Borough. Request for additional tree and woodland data to support this and incorporation of indicators such as: • area of ancient woodland and planted ancient woodland • number of tree preservation orders • length of hedgerows • % trees replaces	Accept that the ecological heritage should be referenced as characteristic. Suggestions for indicators welcomed – these need to be considered in relation to the potential for the LDP to exert a tangible influence.	Ecological heritage importance reflected in baseline and subsequently, the key issues table and SAF. Additional indicators added under objective 19 as well as objective 2.

Rep. No.	Name and Organisation/ Department	Summary of Comment *(refer to NCC consultation database for full text)*	Response	Action
		• no. of SUDS schemes • habitat creation schemes • use of native species within landscaping schemes • no. of businesses achieving the Biodiversity Benchmark award		Assessment rationale revised to reflect modifications.
126	Gwent Wildlife Trust	App. A2 Request following addendums in table: • Newport Wetland is now a National Nature Reserve • Gwent Wildlife Trust and WING manage the Solutia Reserve at Great Traston Meadows (which partly falls within the Nash and Goldcliff SSSI) • of the sites listed, WIND now manages only the Allt yr Yn LNR and shares management of the Solutia Reserve • Ringland Wood is now managed by a 'Friends of' community group. • Caerleon Comprehensive Nature Reserve has always been managed by the school • The other sites (Duffryn Pond, Oaklands, Lodge Wood) are not managed by WING.	Suggestions for corrections are welcomed, however, the last three notes are unclear as the data are not referred to in the baseline.	Changes made to baseline, aside from last three.
126	Gwent Wildlife Trust	Support for the acknowledgement of the value of sites that have not been assessed against SINC criteria. Welcome the acknowledgement of the important role a high quality environment has in supporting local tourism. Welcome the relation of issues to climate change.	Support noted and welcome.	None required
126	Gwent Wildlife Trust	Request greater emphasis on the importance of mitigating and adapting to climate change.	Noted	Additions made to SAF across various objectives, to reflect mitigation of climate change effects.

Rep. No.	Name and Organisation/ Department	Summary of Comment *(refer to NCC consultation database for full text)*	Response	Action
				Objective 13 modified to include the need to adapt to climate change effects.
126	Gwent Wildlife Trust	Suggest that the text points to an incorrect assumption that important, declining and scarce species are only found in LBAP habitats. Suggests that while it may not be a priority to protect certain habitats, these species require protection (dormice and ranunculus moth referenced). Recommend that rare and protected species are treated as a separate issue within the text. Suggest that this could be reflected through greater emphasis on the protection and enhancement of biodiversity in all planning decisions. Suggest that recovery is also important and this should be recognised.	Accept that the protection of biodiversity should be reflected in planning policy irrespective of ecological designation of a site/habitat. SR should incorporate reference to those matters that can be readily influenced by planning policy.	Key issues table modified and subsequent changes to SAF made.
126	Gwent Wildlife Trust	Request inclusion of ecological connectivity within the SA Framework as an objective – support the creation and improvement of ecological connectivity.	Accept that there is a need to incorporate ecological connectivity within the LDP.	Ecological connectivity added as an indicator under objective 2.
126	Gwent Wildlife Trust	Strong support expressed for SA Objectives and particularly the assessment rationale. Diffusion of climate change issue across many topics is considered to show recognition that responsibility for the global environment is not restricted to one particular sector and is supported.	Support noted and welcome.	None required.
126	Gwent Wildlife Trust	Series of comments relating to suggested indicators: 1 Obj. 1 definition required for woodland management schemes 2 Obj. 1 query ability to monitor uptake of guided walks 3 Obj. 1 definition required for 'valued open space; and 'valued landscape' 4 Obj. 1 recommend inclusion of an indicator for tree cover and protection (loss of trees covered by TPOs, % trees lost to	Suggestions for additional indicators are welcome. SR should incorporate reference to those matters that can be readily influenced by planning policy.	1 Definition provided in glossary. 2 Indicator deleted 3 Definitions provided in glossary. 4 included in SAF

Rep. No.	Name and Organisation/ Department	Summary of Comment *(refer to NCC consultation database for full text)*	Response	Action
		development that are replaced) 5 Obj 2 increasing population size of protected species should be defined as increase in range and/or increase in number of individuals 6 Obj. 2 require definition for 'important wildlife habitat' – recommend this should be Section 42 habitat 7 Obj. 2 recommend indicator relating to extent of invasive species (Jap. Knotweed or Himalayan balsam) 8 Obj. 2 recommend indicator to reflect contribution of landscaping schemes to biodiversity e.g. % native species used in landscaping schemes 9 Obj. 3 recommend caution in favouring brownfield sites for development and would like addition of qualifier such as 'subject to assessment against the sustainability objectives' 10 Obj. 4 recommend modifying vegetation and planting schemes to promote the use of native species 11 Obj. 5 suggest matching water quality indicators to the WFD classifications for ease of monitoring 12 Obj. 5 suggest an additional indicator of 'native vegetation and planting schemes to provide carbon sink capacity and improve water quality locally' 13 Obj. 10/12 recommend addition of 'number of businesses achieving the Green Dragon standard' 14 Obj. 16 recommend a target of achieving the CCW accessible natural greenspace standard as well as the NPFA standard	6- the section 42 list refers to species rather than habitats.	5 included in SAF 6 Definitions (including species and habitats) provided in glossary. 7 included in SAF 8 included in SAF 9 included in SAF 10 included in SAF 11 included in SAF 12 included in SAF (omitting reference to water quality) 13 included in SAF 14 included in SAF
250	Persimmon Homes (via WYG)	Recommend addition of the following to the PPP list: • PPW, WAG March 2002 • MIPPS 01/2005 Planning for RE • MIPPS 02/2005 Planning for Retailing and Town Centres	Accept that there is merit in reviewing the appropriateness of including the PPPs highlighted within the PPP list. The determining criteria will be whether they add a new	PPPs reviewed and added to key sustainability themes table.

Rep. No.	Name and Organisation/ Department	Summary of Comment *(refer to NCC consultation database for full text)*	Response	Action
		• MIPPS 01/2006 Housing • MIPPS 01/2008 Planning for Good Design • Local Development Plans Wales: Policy on Preparation of LDPs • The Six Acre Standard: minimum standards for outdoor playing space • LANDMAP • Joint Housing Availability Study for Newport • Housing Needs Study (if available)	dimension to sustainability themes that can be influenced by planning policy.	
250	Persimmon Homes (via WYG)	Recommend reference to the following sources of data: • LANDMAP aspect areas (visual and sensory; historic; cultural; habitat; geology) • Registered Common Land • open access land • SAMs • LBs • Registered Parks, Gardens and Landscapes • Designated Conservation Areas • Schools rolls (surplus capacity) • agricultural land classification	Suggestions for additional sources of data welcome. The SR should include reference to those that can be influenced by LDP policy.	Additional data added to baseline and subsequently, indicators added to SAF. *LANDMAP data unavailable at the time of writing- website technical fault- to be sourced and included at stage B.*
250	Persimmon Homes (via WYG)	Sustainability Issues identified are supported.	Support noted and welcome.	No Change required.
250	Persimmon Homes (via WYG)	Indicators – corrections suggested as follows: • Obj. 9 the target for % development approved in flood risk areas contrary to TAN 15 should be nil	Suggestions for corrections are welcomed.	Corrections made.

Rep. No.	Name and Organisation/ Department	Summary of Comment *(refer to NCC consultation database for full text)*	Response	Action
		• Obj. 19 should include reference to SAMs and LBs		
250	Persimmon Homes (via WYG)	Identified discrepancies between 'potential indicators' and 'target' given for each SA objective and the 'rationale' given subsequently. In particular, the rationale raises issues that are additional to those in the potential indicators and targets – this should be consistent.	Accepted – there is a need to ensure that there is a logical progression through the SR and subsequent SAR.	Assessment rationale reviewed and revised to reflect the newly modified report and SAF.
357	Dwr Cymru Welsh Water	Sustainability Issues identified are supported.	Support noted and welcome.	No Change required.
357	Dwr Cymru Welsh Water	Request reference made to the need to remove surface water associated with new development from the sewerage network to avoid unsustainable upgrade works.	SUDS are supported throughout the document, it is considered that suitable emphasis has been placed on this issue.	No further action required.
208	RSPB	Requests greater evidence of integration of the SR and the HRA.	The HRA is a separate process that is being prepared in tandem with the SA/SEA and the development of the LDP. The findings of the HRA to date are included in the baseline data and have been used to inform the development of the issues analysis and SA Framework and will continue to influence the process.	Review and provide cross-reference where data has been drawn from HRA as appropriate in the next stage of the SA/SEA. No further changes made to the Scoping Report.
208	RSPB	Highlight omission of an updated LBAP as a key weakness in enabling the process of establishing the baseline.	The Council is in the process of updating the LBAP. At such time as the revised LBAP is available, the quality of baseline information relating to the SA/SEA will be reviewed and amended if appropriate. The HRA is also being undertaken in consultation	Ensure that LBAP progress is tracked and incorporate findings of revised LBAP at such time as it becomes available, which will be in subsequent

Rep. No.	Name and Organisation/ Department	Summary of Comment *(refer to NCC consultation database for full text)*	Response	Action
			with relevant nature conservation bodies and latest information being incorporated as it becomes available to the team.	stages of the SA/SEA.
208	RSPB	Pp45, 9, column 2 Strong opposition to inclusion of phrase 'there is a careful balance to be struck between safeguarding environmental quality and achieving requisite development' on the basis that the representor interprets this as counter to the aim of sustainable development to achieve a win win solution to meeting economic and social goals whilst at the same time protecting designated sites. It is recommended that the SR should emphasise the need for the attainment of economic and social goals to safeguard against significant adverse impacts on designated sites in Newport. Request that the reference to balance should be deleted and a new section inserted that refers to integration in support of sustainable development, which should also set out s a key recommendation of the DSR that 'no development should take place on the Gwent Levels'.	The comment has highlighted the potential for the phrase referring to balance to be misinterpreted – the intention was to highlight the need to achieve the win win situation to which the representor refers. The assertion that no development should take place on the Gwent Levels requires careful consideration in light of the potential interpretation of 'development', some of which may be necessary for environmental protection reasons.	Phrasing within key issues table revised. No modification made with regards to the Gwent Levels.
208	RSPB	pp46 Highlight the DSR as being deficient on the basis that it does not set out the likely threats to designated sites from the LDP. Request an additional section setting out threats.	It is considered that the inclusion of a new section on threats would be premature for inclusion in the SR. Threats will be accurately assessed at Stage B of the SA/SEA process and incorporated into the SAR.	No change required at this stage.
208	RSPB	pp76 Assessment Rationale section on Obj. 2 considered deficient on basis that it fails to recommend that no allocations should be made on or in the vicinity of the Gwent Levels SSSI. Request that this section is deleted and redrafted to reflect the supreme importance of the Gwent Levels.	Not accepted. The objective is not exclusively related to the Gwent Levels SSSI and it is not considered appropriate for the objective to be narrowed in focus to exclude other important	No change required at this stage.

Rep. No.	Name and Organisation/ Department	Summary of Comment *(refer to NCC consultation database for full text)*	Response	Action
			aspects of biodiversity within NCC. This level of specific detail is not required until the SA/SEA proceeds to assessment of specific LDP policies in Stage B and will be addressed as appropriate in the SAR.	
208	RSPB	pp56 Representor objects to the following reference: 'the new M4 will have implications for the proportion of people travelling to work in Newport'. Representor highlights issues of longer commuting distances, displaced congestion and exacerbation of climate change. Also request that the reference is made to 'proposed M4' as opposed to new as the proposal has no status to date.	Partially accepted – it would be premature to make an assessment of the implications of the M4 prior to Stage B assessment – this will be considered in the SAR. Correction to reference to M4 as a proposed scheme is accepted.	Reference to M4 removed at this stage.
208	RSPB	PPP Request division of national into UK and Wales. Suggest addition of the following to PPP list: • Wales Biodiversity Framework • One Wales: Connecting the Nation: The Wales Transport Strategy • delete TAN 5 1996; insert TAN5 Consultation version 2006 • Road Traffic Reduction Act • Reference to the Environment Strategy should include the Action Plans • Learning to Live Differently: The National Assembly for Wales Sustainable Development Strategy • WDA: Wales Biodiversity Audit	There is not considered to be any merit in dividing the PPP list into UK and Wales as both are applicable at the same scale in the Welsh context. Suggestions for additional PPPs welcomed. Until such time as TAN 5 is replaced, it is inappropriate to delete the currently adopted document; however, the addition of the consultation version is accepted. Accept that there is merit in reviewing the appropriateness of including the PPPs highlighted within the PPP list. The	PPPs reviewed and added to key sustainability themes table. *Last three unable to source at time of writing.*

Rep. No.	Name and Organisation/ Department	Summary of Comment *(refer to NCC consultation database for full text)*	Response	Action
		• WSP SE Wales area framework • WAP SE Wales A Networked Environmental Region	determining criteria will be whether they add a new dimension to sustainability themes that can be influenced by planning policy.	
208	RSPB	Additional data sources suggested as follows: • CCW has mapped UKBAP Priority Habitats in Newport • RSPB Key Areas for Priority Birds 2007 covers Newport	Suggestions for additional sources of data welcome. The SR should include reference to those that can be influenced by LDP policy. UKBAP mapping and Priority Birds is considered more appropriate for the AA- the results of which will be integrated into the SA- contact: Sarah Revill.	No further action.
208	RSPB	Sustainability Key Issues are not supported on the following basis: • section on biodiversity (pp45) considered deficient as does not set out the issues associated with designated sites – suggest that this is damage from all development types and that the implications should state that no development that would have a significant adverse impact on statutorily designated sites will be permitted. • column 2 of biodiversity (pp45) should remove reference to balance • query reference to 'requisite' development and the attendant implication that there will need to be a fixed areas of development for all development types, on the basis that this does not reflect the non-land means of promoting economic development (i.e. through addressing skills and education agendas and making more resourceful use of existing built development). Request that this paragraph is deleted and replaced with 'the LDP should allocate land carefully in order to avoid having significant adverse impacts on any statutorily designates sites'.	The nature of the comments suggests that the purpose of the SA/SEA and the LDP are confused at times. Certain of the comments raise valid points that merit consideration and possible amendment; however, others are more appropriately reflected in policy phrasing within the LDP as opposed to objectives in the SA/SEA and in certain cases, relate to matters that cannot readily be addressed through land use planning. It should also be noted that the magnitude of potential impacts of LDP policies will not be assessed	Key issues table and indicators modified.

Rep. No.	Name and Organisation/ Department	Summary of Comment *(refer to NCC consultation database for full text)*	Response	Action
			until Stage B, which is reported in the SAR (not the SR) and the SA/SEA is concerned with predicting the potential impacts of policies against the SA Framework, *not* the determination of consequences of development control decisions.	
208	RSPB	Request that section on non-designated habitats be amended to include reference to all forms of development.	This is not accepted – some forms of development will be necessary. Consideration may be given to providing greater clarification of what types of development are considered to pose the greatest threats.	Phrasing modified.
208	RSPB	Insert separate 'issues' section on species of acknowledged conservation concern.	The HRA process is being completed in tandem with the SA/SEA and addresses these issues in greater detail. There may be merit in providing additional detail outlining the general issues associated with species protection.	Biodiversity 'issues' section amended.
208	RSPB	Series of specific proposed amendments set out in the full representor response *(see Note 1)*	Accept points, 7, 8, 9, 14, 22. Point 3: Habitats Directive already included 21 is noted; however it is important that the SR is easily understood and cross-referring to specialist documents (e.g. Sec. 42) as opposed to listing relevant	Changes made with regards to points: 7,8,9,14,22, 5 (although specified dph not used), 6, 10, 11, 13, 16, 23

Rep. No.	Name and Organisation/ Department	Summary of Comment *(refer to NCC consultation database for full text)*	Response	Action
			information is not necessarily considered appropriate. 17- Favourable condition indicators covered under separate objective. 19 and 21- the combination of all the SA objectives will ensure that all policies are appraisal under all objectives. Therefore it is unnecessary to include environmental concerns within the economic objective. Review validity of points 5, 6, 10, 11, 12, 13, 15, 16, 19, 20, 23. Reject points 1, 2, 4, 17, 18 on the basis that they are inappropriate or unnecessary within the SR.	Points rejected: 1,2,3,17,18, 12, 15 (30-50 dph used), 19 & 20 (other objectives capture this) No further action with regards to points: 3, 21, 17, 19, 21
209	Mr R Kelly	Asserts that development, to be sustainable, requires a cluster of development around the main UDP land-use at Corus Representor suggests that the M4 toll road and car proposed interchange south west of Corus should be considered. To encourage the UDP proposals at Corus further development particularly for family houses should take place south. This will ensure a sustainable linkage	It is considered that these comments are more appropriately directed to the LDP team as the SA/SEA assesses the policies.	No further action made.
1335	Mr R Lewis	Supports sustainability issues and indicates that additional objectives should be provided, but sets out no further detail.	Noted.	No change required.
1456	The Theatres Trust	Supports sustainability issues, particularly that leisure offer should be sustained and improved and would welcome specific guidance on	The SR is not set up to provide specific guidance of the sort referenced; however, such issues	Added to SAF under objective 20.

Rep. No.	Name and Organisation/ Department	Summary of Comment *(refer to NCC consultation database for full text)*	Response	Action
		protecting and encouraging arts and cultural provision.	can be reflected in the indicators.	
1576	CCW	Stress that all comments are made in the light of commendation on the overall quality, clarity and content of the document and should be considered to reflect areas for improvement or refinement.	Support noted and welcomed.	No action required.
1576	CCW	Highlight the requirement to ensure that the SEA elements are clear throughout the report, particularly the consideration of cumulative, synergistic and indirect effects. Concern is also raised that the SR does not reference the consideration of alternatives as required by Article 5 of the SEA Directive.	The SA/SEA methodology proposed has been refined through several years of practical application and is considered to satisfy the SEA Directive. The SAR includes the consideration of alternatives in the appraisal of options (stage B2) and cumulative, synergistic, indirect effects (as part of B3/4) and will clearly indicate the significant environmental effects – this is the next stage of the assessment.	No change required at this stage.
1576	CCW	Request that the outputs of the community strategy are incorporated into the SA/SEA Scoping.	Accepted. The community strategy has been reviewed as part of the baseline work (Stage A), is included in the PPPs and key points have influenced the identification of key issues.	No further action taken.
1576	CCW	The following suggestions were made for corrections: 1.1 – insert 'candidate' re: Severn Estuary SAC 1.6 – reference potential effects to Ramsar and European Sites outwith the plan area (e.g. water abstraction implications for River Wye SAC) Recommend inclusion of clarification that as part of any Appropriate Assessment NCC will have regard to the manner in which the plan would be carried out, and to any conditions or restrictions which could avoid	Accepted.	Amend to reflect comments.

Rep. No.	Name and Organisation/ Department	Summary of Comment *(refer to NCC consultation database for full text)*	Response	Action
		adverse impacts on the European Site(s)(Regulation 48(6) of the Conservation (Natural Habitats &c) Regulations 1994)		
1576	CCW	Recommendations for the inclusion of a considerable no. of additional PPPs *(see Note 2)*	Accept that there is merit in reviewing the appropriateness of including the PPPs highlighted within the PPP list. The determining criteria will be whether they add a new dimension to sustainability themes that can be influenced by planning policy.	PPPs reviewed and added to key sustainability themes table.
1576	CCW	Recommends that the SA/SEA should include the aim to protect, maintain and enhance not only 'areas of biodiversity importance' but also aim to positively contribute to wider biodiversity and connectivity between sites of biodiversity importance and significance. Suggest ref. to HRA is not required as it is a legal prerequisite, but highlights those additional SEA topics to which this relates are human health, soil, water and air.	Accept. The objective seeks to 'To protect, manage and enhance biodiversity' which includes areas of importance as well as the wider perspective. The cumulative effect of the indicators will enable this.	No further action taken.
1576	CCW	Request to clarify when there is a difference between a legislative duty to protect habitats and species and under which circumstances this is a discretionary action. Recommends that LDP should aim to protect the effective viability of protected sites and species through reference to their functional size and ecological connectivity and reference the duty on the LPA under Section 40(1) of the Natural Environment and Rural Communities Act 2006.	Accepted in concept and it is agreed that the reference to ecological connectivity could be incorporated into the SA Framework through identification in issues, reflection in indicators and reference in the assessment rationale.	Ecological connectivity added to SAF as an indicator under objective 2.
1576	CCW	Noise Pollution Request reference to any tranquillity mapping available for NCC and both the positive benefits of natural green space in reducing noise pollution and those areas where noise pollution may have significant detrimental	Accepted – there is a need to source tranquillity mapping. This should be incorporated into the baseline analysis as and when it becomes available. The need to	No further action until data becomes available.

Rep. No.	Name and Organisation/ Department	Summary of Comment *(refer to NCC consultation database for full text)*	Response	Action
		impacts to protected species and habitats.	emphasise the value of greenspace is noted. Note: Data not available until 2010.	
1576	CCW	Air Pollution Highlights requirement for policies to seek to promote pollution reducing activities such as sustainable transport and the value of the natural environment.	Agreed. The SA Framework already incorporates objectives linked to all of the issues highlighted.	No change required.
1576	CCW	Energy Efficiency of housing stock Request reference to improving the energy efficiency of existing housing stock.	Agreed. The SA Framework already incorporates indicators linked to the issue highlighted. It should be noted that it is difficult for land use planning to be pro-active on this issue.	No change required.
1576	CCW	Reduce the risk of flooding Recommend inclusion of policies that explore alternative uses for flood risk areas in terms of biodiversity, flood storage/alleviation, managing coastal squeeze etc.	It is considered that this comment is more appropriately directed to the LDP team as the SA/SEA assesses the policies – influence can only be exerted if these issues appear in the SA/SEA framework and are reflected in the assessment rationale.	Added as an indicator under objective 9.
1576	CCW	Encourage sustainable use of the countryside Recommend inclusion of policies that recognise the value of this asset and seek to enhance through appropriate investment where possible and appropriate to ensure sustainability in the longer term.	It is considered that this comment is more appropriately directed to the LDP team as the SA/SEA assesses the policies. The indicator measuring countryside management schemes addresses this comment.	No further action taken.

Rep. No.	Name and Organisation/ Department	Summary of Comment *(refer to NCC consultation database for full text)*	Response	Action
1576	CCW	Promote protection and enhancement of valued landscape character AND protect and enhance the valued historic environment and its setting Recommend that the historic landscape be referenced (Gwent Levels Historic Landscape of Outstanding Historic Interest) including the ASIDOHL methodology and LANDMAP.	Noted. Baseline data requires reference to historic data, some of which was not available at the time of writing. ASIDOHL is a specific assessment process that is generally triggered at such time as developers seek planning permission – as such it is not considered appropriate to reference in the SR – this comment is more appropriate for the LDP team.	At such time as requisite data is available, incorporate into the SAR as appropriate.
1576	CCW	Reduce pollution of watercourses, groundwater and improve water quality Recommend a more proactive approach within the policy framework than ensuring adequate drainage. Seeking to see SUDS as a matter of course and specific policies to tackle issues such as contaminated land.	It is considered that this comment is more appropriately directed to the LDP team as the SA/SEA assesses the policies – influence can only be exerted if these issues appear in the SA/SEA framework and are reflected in the assessment rationale. The SR already includes reference to SUDS as an appropriate measure of controlling water quality and addressing drainage and cross-reference is made in details linked to air quality and pollutant release.	No further action taken.
1576	CCW	Ensure prudent use of land and other resources This section should also reference SEA topics Climatic Factors and Cultural Heritage	Accepted	Amendment made in accordance with comment.

Rep. No.	Name and Organisation/ Department	Summary of Comment *(refer to NCC consultation database for full text)*	Response	Action
1576	CCW	Encourage the use of more sustainable modes of transport This section should also reference SEA topics climatic factors and air	Accepted	Amendment made in accordance with comment.
1576	CCW	Address the causes of climate change etc. SA/SEA should also contain policies which address the impacts of climate change through 'future proofing' development policies and proposals.	It is considered that this comment is more appropriately directed to the LDP team as the SA/SEA assesses the policies – influence can only be exerted if these issues appear in the SA/SEA framework and are reflected in the assessment rationale. Measures to adapt to the future impacts of climate changes such as flood risk, energy efficiency, sustainable design and linked habitats are already encompassed within other objectives.	No further action taken.
1576	CCW	Increase energy efficiency and promote renewable energy production and use Expect to see policies that promote new energy generation, to include full evaluation of potential impacts on the natural environment, particularly landscape and protected sites and species.	It is considered that this comment is more appropriately directed to the LDP team as the SA/SEA assesses the policies – influence can only be exerted if these issues appear in the SA/SEA framework and are reflected in the assessment rationale.	No further action taken.
1576	CCW	Safeguard non-renewable resources Recommend that all such policies include full consideration of potential impacts on the natural environment particularly landscape and protected sites and species.	It is considered that this comment is more appropriately directed to the LDP team as the SA/SEA assesses the policies – influence can only be exerted if these	No further action taken.

Rep. No.	Name and Organisation/ Department	Summary of Comment *(refer to NCC consultation database for full text)*	Response	Action
			issues appear in the SA/SEA framework and are reflected in the assessment rationale.	
1576	CCW	Improve accessibility This section should also reference the SEA topic Air	Accepted	Amendment made in accordance with comment.
1576	CCW	Improve health and well being Recommend reference to the therapeutic use of the environment, particularly accessible natural green space, as a key element of the SA/SEA process.	It is considered that this comment is more appropriately directed to the LDP team as the SA/SEA assesses the policies – influence can only be exerted if these issues appear in the SA/SEA framework and are reflected in the assessment rationale.	Accessible natural greenspace added as an indicator in the SAF.
1576	CCW	Reduce poverty and social exclusion etc. CCW promotes access to a quality environment for all and recommends the inclusion of quality environmental facilities, recreational space and biodiversity as an integral part of any general social improvement policies.	It is considered that this comment is more appropriately directed to the LDP team as the SA/SEA assesses the policies – influence can only be exerted if these issues appear in the SA/SEA framework and are reflected in the assessment rationale. The cumulative effect of the SA Objectives will help to achieve this aim.	No further action taken.
1576	CCW	All economic themes should also reference the potential implications of various options on the transport infrastructure, water resources and biodiversity and incorporate, where possible, PPPs that promote and enhance them.	It is considered that this comment is more appropriately directed to the LDP team as the SA/SEA assesses the policies – influence can only be exerted if these issues appear in the SA/SEA	No further action taken.

Rep. No.	Name and Organisation/ Department	Summary of Comment *(refer to NCC consultation database for full text)*	Response	Action
			framework and are reflected in the assessment rationale. Stage B of the assessment will consider the cumulative, synergistic and indirect effects of policies against the SA Framework, which should assist in capturing some of these issues.	
1576	CCW	Establish a strong tourism economy etc. This section should also reference 'biodiversity' as many of the tourism opportunities in Newport relate to the natural environment	Accepted.	Amendment made in accordance with comment.
1576	CCW	Suggest further consideration of the following datasets: • Further detail on the 'important species' referenced in the framework • analysis for key habitat types with reference to Phase I and any monitoring data available from CCW and/or SEWBRec • Historic Landscape Characterisation • RoWIPs • Accessible Natural Greenspace provision • LANDMAP data • TAN 8 and supporting information re: locations for development of sustainable energy resources	Agree that there could be benefit in clarifying the 'important species' to be protected. Representations have referenced Sec 42, which may be appropriate to include in the appendix and cross-reference. Similarly, key habitat types are listed in the appendices and could benefit from cross-referencing. Phase 1 and data from SEWBRec and CCW will be included within the AA, the results of which will be integrated into the SA. Accessible Natural Greenspace The toolkit has not been undertaken and is due to start in the next few months. Suggestions for additional sources of data welcome. The	Rights of Way data already included within baseline. Further detail on important species added throughout the report, especially key issues table. *Historic Landscape Characterisation and Accessible Natural Greenspace Provision data unavailable at time of writing*. *LANDMAP data unavailable at the time of writing- website technical fault- to be sourced*

Rep. No.	Name and Organisation/ Department	Summary of Comment *(refer to NCC consultation database for full text)*	Response	Action
			SR should include reference to those that can be influenced by LDP policy.	*and included at stage B.* Note: Newport is not within any of the TAN8 strategic locations.
1576	CCW	Table 5.1 1. refer to APIS air quality data for critical loads and limits for specific habitat types. Include reference to potential for creating carbon sinks 2. query appropriateness of local food production and highlights need to reference in indicators (e.g. no. and active take up of allotment areas; supporting local food suppliers for council services; support for farmer markets. 3. insert WAG targets in respect of CO2 emissions 4. insert indicators specifically linked to BREEAM and additional measures in the WHQS 5. use LANDMAP as a key indicator and ensure that landscape indicators do not relate to biodiversity designations 6. use RHS to identify targets in respect of water quality 7. ensure flood risk includes measures to 'future proof' development and include opportunity for creating/managing habitats for flood alleviation and creating sustainable drainage schemes 8. seek inclusion of reference to the specific provisions now in legislation for setting up Commons Associations in reference to targets and performance indicators 9. correct reference to River Usk and Severn Estuary and complete the reference to the full range of DAC features within the baseline (i.e. habitats as well as species) 10. incorporate BAP targets for specific habitats and species and developing eco-connectivity work for further improving and enhancing	Suggestions are welcome. Care should be taken to ensure that the level of detail is correct for SEA and not overly detailed as the latter is addressed through project-level EIA. There is also a need to ensure that the SA/SEA framework remains focused on matters that can reasonably be influenced by land use planning through the policies and proposals of the plan. HRA points noted and will need to be actioned by the ecology team undertaking the work in tandem with the SA/SEA. Access to natural greenspace: The toolkit has not been undertaken and is due to start in the next few months.	1. no further action 2. changes made to SAF 3. SAF amended 4. no further action taken 5. *LANDMAP data unavailable at the time of writing- website technical fault- to be sourced and included at stage B.* 6. WFD indicators used 7. SAF amended. 8. no further action 9. changes made to key issues table *10. BAP targets to be included when available.* 11. no further action

Rep. No.	Name and Organisation/ Department	Summary of Comment *(refer to NCC consultation database for full text)*	Response	Action
		the network 11. a robust assessment of the implications of development on contaminated land will need to be included in the HRA 12. include access indicators for non-road modes (e.g. RoWIP targets) 13. cultural heritage should consider natural and built environment 14. reference should be made to specific targets for health and physical activity that are set out in the access to natural greenspace toolkit 15. Economic elements should be cross-referenced to the environmental indicators, especially climatic factors.		for SA 12. Already included- no further action 13. SAF modified *14. Toolkit to be included when available.* *15. This is a fundamental element of the SA process and will be evident at stage B.*
1576	CCW	Recommendations for Table 6.1 SAF: Series of specific proposed amendments *(see Note 3)*	Accept points 1, 2, 3, 11, 15, 19, 25, 26 Review validity of points 4, 5, 7, 10, 16, 23 Reject point 9 on the basis that they are inappropriate or unnecessary within the SR.	Changes made in accordance with points: 1,2,3,11,15,19,25,26, 5 (reviewed), 7, 23 No further action with regards to points: 9,4,10
1576	CCW	Strong support for the Assessment Rationale	Support noted and welcome.	No change required.
1631	Accent Newport Trust	Provision of detailed explanation and description of perceived benefits of Chartist led development (Stow Hill Area Chartist Project)	The SA/SEA is required to focus on issues of strategic importance and provide a framework for assessing the performance of LDP policy formulation in relation to the Sustainability Appraisal Framework.	Chartist data added to baseline, key issues table and as an indicator under objective 20.

Rep. No.	Name and Organisation/ Department	Summary of Comment *(refer to NCC consultation database for full text)*	Response	Action
			Much of the material submitted by the representor is considered of value in respect of providing a basis for support in LDP policy formulation and would more appropriately be directed to the LDP team. The detail of the project would not be subject to assessment through the formal SA/SEA process unless it were to be included as a specific policy within the LDP and is therefore not considered to be directly relevant to the finalisation of the SR. Notwithstanding the above, the list of potential benefits can be cross-referenced against the proposed SA Framework to ensure representation; and there is considered merit in referencing the Chartist movement within the baseline description.	
1631	Accent Newport Trust	Support for the Sustainability Issues identified	Support noted and welcome.	No change required.
1631	Accent Newport Trust	Suggest that the concept of 'citizenship' be included as a separate category	This was discussed at length through consultation workshops and no satisfactory conclusion was reached with regard to a definition of citizenship that linked directly to the potential for change to be delivered via the planning system. As such, it is not	No change required.

Rep. No.	Name and Organisation/ Department	Summary of Comment *(refer to NCC consultation database for full text)*	Response	Action
			considered appropriate to separate the concept out into a standalone objective.	
1671	Newport City Council	Suggest that addition of the following PPPs • Climbing Higher • Sports Development Strategy • Play Policy • Going for Gold • Five for Life • GP Exercise Referral	Accept that there is merit in reviewing the appropriateness of including the PPPs highlighted within the PPP list. The determining criteria will be whether they add a new dimension to sustainability themes that can be influenced by planning policy.	PPPs reviewed and information integrated into report, especially through the key sustainability themes table.
1671	Newport City Council	Suggest consideration of the following sources of data • Sports Council for Wales Biannual Study – adults and children • Welsh Health Study	Suggestions for additional sources of data welcome, although data from the Sports Council for Wales are already included in the appendices. The SR should include reference to those that can be influenced by LDP policy- the SR already includes the data on health that can be influenced by land use policy.	Data sources reviewed and data deemed unnecessary for inclusion based on the data already contained within the baseline.
1671	Newport City Council	Agreement expressed in respect of the sustainability issues identified.	Support noted and welcome.	No change required.
1671	Newport City Council	Suggest inclusion of the following as additional sustainability issues: • walking from doorstep to school, work, shops etc.; • cycle routes from doorstep to school, work, shops etc. • access local community facilities	Accessibility Standards are already included within Appendix A and lead to the accessibility objective in the SA Framework.	No further action taken following review of comments and report.

Rep. No.	Name and Organisation/ Department	Summary of Comment *(refer to NCC consultation database for full text)*	Response	Action
		• multi-use games areas and informal play spaces • meeting spaces		
	Overview and Scrutiny Forum	Endorsement of the sustainability objectives set out in the report.	Support noted and welcome.	No change required.
1.1	Internal Comments	Suggest that the SA/SEA refer to the following: • new Draft Economic Development Strategy 2008-2011, due to go to Cabinet in November for approval for consultation • emerging Tourism Strategy going for review to Scrutiny in October Noted that the sections on skills and the local economy make no reference to the EDS and suggest that this should be rectified.	Accept that there is merit in reviewing the appropriateness of including the PPPs highlighted within the PPP list. The determining criteria will be whether they add a new dimension to sustainability themes that can be influenced by planning policy.	PPPs reviewed and information integrated into report, especially through the key sustainability themes table. *Tourism Strategy not available at time of writing.*
1.2	Internal Comments	Seek correction of reference to the County Borough – suggest it should be City.	Newport remains a County Borough for the purposes of describing the type of administrative area. It is recognised that the Council name is Newport City Council.	Accuracy of referencing checked throughout document.
2.1	Internal Comments	Air Quality Suggested revisions to the potential indicators to ensure that they reflect matters already measured or recorded by the council and are measurable and achievable. Also designed to link to the UK Air Quality Criteria objectives.	It is recognised that indicators and targets should ideally reflect those already collected by the Council or other bodies; however, the SA/SEA may also require additional or new datasets to be developed to enable accurate recording of progress against the	No further action taken at this stage.

Rep. No.	Name and Organisation/ Department	Summary of Comment *(refer to NCC consultation database for full text)*	Response	Action
			objective.	
2.2	Internal Comments	Climate Change and Energy Efficiency Highlights importance of considering air quality and climate change as separate issues, primarily on the basis of scale.	The comment is accepted. The SA/SEA does make a distinction between air quality and climate change by providing separate objectives; however, it is considered appropriate to maintain some cross-over in the indicators as the two issues share common links.	Text reviewed to ensure distinction is clear.
2.3	Internal Comments	Objs. 5, 10 and 11 Representor states that Objective 5 is vague and suggests that it should be incorporated into Objs. 10 (energy efficiency); 11 (promoting renewables); and 13 (promoting sustainable high quality building design). It is suggested that on their own it is unclear what environmental benefit they provide and incorporation of energy efficiency would rectify this. Strengthen indicators for Obj. 10 – remove NOx emissions rate for boilers; replace with an indicator relating to the number of upgrades. Draw on Energy Saving Trust/Energy Efficiency Advice Centre to identify targets for Obj. 10 and calculate carbon savings.	It is considered that the assessment rationale reflects the difference between the different objectives and supports the retention of Obj. 5 in addition to the others. There may be merit in reviewing the indicators to ensure they align with the rationale. Accept that SAP rating indicator is incorrectly placed and should be moved from Obj. 11 to Obj. 10. It is considered that the calculation of carbon savings is too specific for this level of assessment and is a matter that would be considered through other processes (e.g. project level EIA and/or BREEAM assessment).	Objective 5 retained. Assessment rationale modified for objective 5 to better reflect the indicators. No further changes made to avoid unnecessary repetition in the SAF-policies are assessed against all objectives simultaneously and the SA/SEA process requires consideration of cumulative, synergistic and indirect effects. Indicator for objective 10 retained. SAP indicator

Rep. No.	Name and Organisation/ Department	Summary of Comment *(refer to NCC consultation database for full text)*	Response	Action
				moved.
2.4	Internal Comments	Additional sources of data for climate change, energy efficiency etc. targets and indicators suggested: • consultation with local authority HECA officer (Paul Thomas) • consultation with Energy Manager (Jonathan Morgan) • consultation with sustainability officer (Carl Touig) • consultation on energy efficiency, renewable and climate change objectives and targets with the Welsh Local Government Association Energy Efficiency/Renewables officer Jim Prosser; The Energy Saving Trust Office; and Carbon Trust.	The suggestions are welcome. For the purposes of the SR, consultation has been undertaken with key stakeholders, within which the council officers have been provided with the opportunity to comment, both through workshops and in a formal written response. There will be further opportunity for comment at the next stage of the assessment, with the publication of the SAR.	No further targeted consultation considered necessary at this stage.
2.5	Internal Comments	Suggestion to reference the following: • DTI White Paper 'Towards a low carbon future' • WAG A Fuel Poverty Commitment for Wales • Review of Energy Policy in Wales • Starting to Live Differently • Energy Saving Wales • An Energy Strategy for Welsh for LAs	Accept that there is merit in reviewing the appropriateness of including the PPPs highlighted within the PPP list. The determining criteria will be whether they add a new dimension to sustainability themes that can be influenced by planning policy.	PPPs reviewed and information integrated into report, especially through the key sustainability themes table. *Energy Strategy unavailable at time of writing.*
2.6	Internal Comments	Obj. 3 Amend indicator to read 'area of *potentially* contaminated land remediated and brought back into use' to correct the legislative definition and meaning. Add indicator 'the no. of sites investigated or remediated on behalf of the local authority.'	Accepted.	Amendment made in accordance with comment.
3.1	Internal	Replace the Wales Transport Framework 2001 with the Wales Transport	Accepted. There will also be a	PPPs reviewed and

Rep. No.	Name and Organisation/ Department	Summary of Comment *(refer to NCC consultation database for full text)*	Response	Action
	Comments	Strategy – One Wales: Connecting the Nation April 2008 in the PPP list. SEWTA Regional Transport Plan Consultative Draft July 2008 should be added (currently out for consultation) – add to PPPs.	need to review the document and include relevant points in the sustainability themes etc.	information integrated into report, especially through the key sustainability themes table.

Note 1: RSPB Specific Proposed Amendments

1. Section 1.1, Para 6, line 6 (p7): Delete "options". Insert "solutions". Reasons: conformity with the Habitats Regulations.
2. Figure 2.1 (p14): Delete contents of Box A4 "Developing the SA Framework". Insert "Developing SEA Objectives" Reason: Conformity with the ODPM Guide quoted in the DSR.
3. Table 3.2: Column 9, p21): Insert reference to the HRA into Row 2 of the "Environment" theme. Reason: Completeness.
4. Table 3.2: Reference to the need for "policies" to "promote" or "provide" should be complemented by an equivalent reference to "allocations". Reason: It is important that the potential adverse impacts arising from allocations is reflected here.
5. Table 3.2: Insert "development of a sustainable landuse pattern" and "the establishment of the requirement for a minimum housing density of 40 DPH" in column 5 of the "to ensure prudent use of land resources" row. Reason: A sequential approach is only one element of the prudent use of land.
6. Table 3.2: As above, in respect of the row entitled "encourage the use of more sustainable forms of transport", and the "reduce traffic congestion" row.
7. Table 3.2: "Address the Causes of Climate Change and Promote the Reception in Greenhouse Gas Emission" (P26): Insert reference to the One Wales Transport Strategy and the Wales Spatial Plan SE Wales Area Statement.
8. Table 3.2: Column 5: Insert reference to climate change adaptation, not merely mitigation.
9. Section 4.4: Environmental Data (p37) Bullet Point 2: Insert "UKBAP and LBAP" before "Habitat Types". Reason : In order to add clarity to this section. Delete "Designated Sites of Important for Nature Conservation". Insert :-Sites of Special Scientific Interest (SSSIs) -Sites of Importance for Nature Conservation (SINCs) Reason: Clarity.
10. Table 5.1; Row "Biodiversity". Column 2 (p45): Delete sentence stating "...there is a careful ..etc". Insert a section on the need to pursue an integrated approach to sustainable development, which safeguards all nationally important nature conservation resources whilst promoting economic development and social goals. Reason: See covering letter.

11. Threats to Habitats2 (p46): Delete "Industrial development such as ...etc". Insert "All built development". Reason: Damaging development is not restricted to industrial development.
12. Row "Economic" p54 Column 2: Insert "provided that it does not have significant adverse impacts on biodiversity resources of acknowledged nature conservation concern" after "sites for employment" (line 5). Reason: In order that the LDP process pursues SD goals.
13. Row "Climate Change" p56 Column 2: Insert a section on how the LDP should both mitigate for and adapt to climate change.
14. Table 6.1 Objective 2 ("To protect, manage and enhance biodiversity"): Delete "LBAP targets to be added when they're completed" throughout. Insert:-WAG targets on the percentage of SSSI's in Favourable Condition and Natura 2000 sites in Favourable Conservation Status, for designated sites. -Insert "Halt losses" in the target column for species. Delete "Protected Species", in "Potential Indicators" column. Insert "Species of acknowledged conservation concern". Reason: Not all species of acknowledged conservation concern have the benefit of specific legal protection, over and above the protection of wild species in general. -The target for the amount of important wildlife habitat lost to other uses" should be zero. -The target for the "area of land affected by planning applications that lead to loss of species and habitats of important biodiversity value" should be zero.
15. Table 6.1 Objective 3 (p 64): The density standards set here are too low. The minimum standard should be at least 40 DPH. There should also be an equivalent job density target, expressed as jobs per hectare, as a means of expressing the efficient use of land for employment uses.
16. Table 6.1 Objective 5 (p 65): The target for greenhouse gas emissions should be set at 3% per annum. Reason: This is in conformity with the WLGA Declaration on Climate Change, of which Newport is a signatory. In addition, this objective should be expressed sectorally, with ambitious targets for annual greenhouse gas emissions reduction for housing, employment and transport.
17. Table 6.1 Objective 7: Potential indicators for water quality should include reen quality for the Gwent Levels. These data are available from CCW as part of its monitoring of Favourable Condition.
18. Table 6.1 Objective 7, Column 2 ("Rationale"): This column should state that LDP policy should state that development proposals which have a significant adverse impact on water quality (especially reen quality) will be refused.
19. Table 6.1 Objective 21 ("To enable High and Stable Levels of Local Employment in Newport"): Insert "...where this does not have significant adverse impacts on the environment" after "...suitable modes" (line 3) Reason: To comply with sustainable development.
20. Table 6.1 Objective 22: ("To support diverse and viable business growth") Insert "..sustainable" after "enhanced" (line 2) Reason: To comply with sustainable development.
21. Table A.1. "Indicator Important Species": The list of bird species set out here should be deleted throughout, and replaced with "species of acknowledged conservation concern, drawn from s42 of the NERC Act and Annex 1 of the European Union Habitats Directive. Reference should also be made here to the RSPB Key Areas in Newport, which focus conservation action in areas of national importance for the bird species concerned. Species Action Plans (SAPs) from the reviewed LBAP should also be included.

22. Table A1 ("Broad Habitat Types which occur in Newport") p6: Coastal and Floodplain Grazing Marsh, a UKBAP Priority habitat type should be added to this list.
23. Table A1 ("Threats to Coastal and Floodplain Grazing Marsh") p41: Bullet Point 12 should be deleted and replaced with :- "Development for all development types" Reason: Damaging development is not restricted to roads, landfill and leisure.

Note 2: CCW recommended additional PPPs

International and European Level

- Renewed EU Sustainable Development Strategy 2006
- Bonn Convention on the Conservation of Migratory Species of Wild Animals 1979
- Bern Convention on the Conservation of European Wildlife and Natural Habitats 1979
- Ramsar Convention on Wetlands of International Importance 1971
- EU Biodiversity Strategy
- Directive on the Assessment and Management of Flood Risks 2007/60/EC
- EU Bathing Water Directive 76/160/EEC
- EU Freshwater Directive 78/659/EEC
- Environmental Liability Directive 2004/35/EC
- EU Shellfish Water Directive 79/932/EEC
- UK Level
- Climate Change- the UK Programme 2006
- Air Quality Strategy for the UK 2007
- NERC Act 2006
- UK Marine Bill Consultation 2006
- UK Climate Impacts Programme 2002
- Sustainable and Secure Buildings Act 2004

- Our Energy Future- UK White Paper on Energy 2003
- Water Resources for the Future (Environment Agency)
- Stern Review on the Economics of Climate Change 2006
- Conservation (Natural Habitats & c)Regulations as amended
- Air Quality and Climate Change- a UK perspective 2007
- Consultation on Planning Policy Statement- Planning and Climate Change 2006
- Earth Science Conservation in Great Britain 1990
- Planning (Listed Buildings and Conservation Areas) Act 1990
- Protection of Badgers Act 1990
- Hedgerow Regulations 1997
- Wildlife and Countryside Act 1981 (as amended)
- Countryside and Rights of Way Act 2000
- Protection of Badgers Act 1992
- Hedgerow Regulations 1997

National (Wales) Level

- Relevant Water Resource Management Plans (Dwr Cymru/Welsh Water)
- Relevant Catchment Abstraction Management Plans and Drought Management Plans
- Relevant Catchment Flood Management Plans (EA)
- Welsh Assembly Government Integration Tool 2002
- Wales Spatial Plan Update 2008-10-15
- Wales Transport Strategy 2007
- Priority Habitats in Wales (CCW) 2003

- Draft Wales Soils Action Plan 2007
- Cultural Strategy for Wales 2002
- Rural Development Plan for Wales 2007-2013
- Walking and Cycling Strategy for Wales
- Ministerial Interim Planning Policy Statements 01/2008 Planning for Good Design
- Ministerial Interim Planning Policy Statement 01/2005 Planning for Renewable Energy
- Ministerial Interim Planning Policy 02/2005 Planning for Retailing and Town Centres
- Planning for Climate Change- consultation document Dec 2006.
- Wales Waste Strategy
- Wales Coastal Tourism Strategy
- Register of special and outstanding historic landscapes
- Welsh Assembly Government Policy Integration Tool 2002
- CCW Priority Habitats in Wales 2003
- Better Woodlands for Wales 2005
- Consultation Planning Policy Statement: Planning and Climate Change 2006
- Welsh Office Circular 60/96: Planning and the Historic Environment. Archaeology/Historic Buildings
- Draft Strategy for Wales on Integrated Coastal Zone Management 2006

Regional Level

- Relevant Regional Spatial Strategies in England
- Available SEA consultation documents for the neighbouring authorities Local Development Plans and other relevant regional plans such as the regional transport plan)
- Consultation draft River Basin Management plans
- Draft Catchment Flood Risk Management Plans

- Historic landscape management plans (if available)
- Valleys Regional Park Action Plan
- Documents already produced to aid the production of Severn Estuary Shore Line Management Plan 2 e.g. the Gwent Levels Foreshore Management Plan and the Severn Estuary Coastal Habitat Management
- Plan (both Environment Agency Documents)
- WAG Severn Estuary Marine Aggregate Dredging Policy

Local Level

- Supplementary Planning Guidance - Crindau Development Brief and associated HRA
- Draft River Usk Flood Strategy
- Gwent Levels Water Level Management Plan (Caldicot and Wentlooge Levels Drainage Board/Environment Agency)

Note 3: CCW recommendations for table 6.1

1. While many of these are reasonable indicators of sustainability it is unclear how relevant they are to the LDP process; for example, how will the LDP be able to influence the uptake of guided walks or the use of the PRoW network? An alternative approach would be to adopt any targets and indicators contained in documents such as the RoWIP. Similarly, specific targets for areas of open space should reference documents such as the accessible natural green space toolkit and any loses should be tied to clear mitigation measures.
2. CCW welcomes the close linking of the Newport LBAP to the achievement of objective However, some of these indicators may have specific targets outside the LBAP process which can be influenced directly by LDP policies, such as the area of land subject to section 106 agreements and the amount of green space identified and safeguarded. These should be identified under their specific sections. In addition, some of the indicators, as suggested, are only of limited value given the context of this SEA relating to an LDP. Indicators should be relevant to the plan under scrutiny, capable of reacting in response to the plan under scrutiny and also capable of measurement. For example, indicators such as the population size of protected species may be difficult to influence through the LDP process and not be a particularly meaningful indicator. Finally, the area, numbers and condition of protected sites may be beyond the direct scope of the LDP process and CCW would wish to see these reconsidered, ideally after further discussion with ourselves before targets and indicators are chosen.
3. Indicators relating to consumption of locally produced food will be difficult to meaningfully relate to LDP policies. More meaningful indicators would relate to number and take-up of allotments, number and distribution/frequency of farmers markets, number of organic farming initiatives supported etc. Similarly, a direct link between grade of agricultural land and food production may not be relevant and would include important biodiversity markers.

4. Reference should be made to specific (critical?) locations or sensitive areas for monitoring and targeting actions. Specific carbon-sink schemes should be considered as distinct policies if to prove meaningful (see comments above) in respect to climate change. In addition to NOx values, ground level ozone may require a specific reference due to its potential impacts on health and biodiversity.
5. While, in principle, all of these are positive indicators for change, some are difficult to monitor and are not be relevant to LDP polices.
7. Without building in specific conditions in development polices relating to water quality, it is difficult to see how these can be meaningfully influenced by the LDP process, particularly how the LDP will be able to produce policies which will increase Biological River Quality or River Water Chemistry (?) levels. More meaningful would be indicators relating to buffer zones along water courses, sustainable drainage schemes, improvements to existing off-line drainage (e.g. non CSO drainage) etc.
8. CCW welcomes the indicators and targets for reducing water consumption but recommends inclusion of more quantitative targets in any final iteration of the plan - for example, all new developments over a certain size to contain grey-water systems, all local authority developments to include the listed features. We also recommend that these are linked to the predicted water resource demands (increases/decreases) of the various options.
9. CCW welcomes the inclusion of specific indicators and targets for minimising risk of and from flooding. We also welcome linking this to climatic factors and would also encourage the plan to look carefully at alternative approaches particularly those put forward in documents such as the Severn Estuary shoreline management plan and River Usk flood strategy.
10. While CCW supports the principle of increasing energy efficiency we recommend more meaningful indicators than for example increasing the use of low energy light bulbs (likely to become the default position before the plan comes into force) and provision of triple A rated white goods. Good indicators such as the number of new and existing homes meeting BREEAM good or excellent standards and number of households with access to sustainable and/or locally sourced energy. This should be linked to objective 13 where these are clearly set out.
11. CCW welcome an objective for renewable energy production, but would recommend an indicator that relates to the type and quality of scheme to be encouraged rather than a generic target for number of planning permissions received. This should be linked with energy efficiency measures (see above) and include careful consideration of any potentially negative environmental impacts (for example, local schemes such as CHP, solar water, ground source heat pumps being potentially more sustainable and easier to incorporate into the process than larger schemes).
13. CCW welcome the adoption of Ecohomes and BREEAM standards for sustainable developments.

Social

15. CCW welcomes the inclusion of indicators for physical activity under the improvement of health and well being, particularly those relating to allotments, and cycle routes. However, we recommend reference to specific targets relating to, for example, safe routes to school, accessible natural green space, and take up of outdoor recreation/use of recreational infrastructure by target groups (perhaps through support for initiatives such as the Come Outside! model or by referencing specific targets within the RoWIP).

16. CCW welcomes the inclusion of a possible indicator for "green space" but would strongly recommend the adoption of the targets set out in CCW's Accessible Natural Green Space Toolkit.

19. CCW welcomes an indicator for the application of the ASIDHOL methodology for developments with the potential to impact on the Gwent Levels historic landscape of outstanding interest.

Economic

23. CCW welcomes the inclusion of indicators for enhancing the tourism offer in Newport. However, we recommend specific indicators for the natural environment (such as the Wetland reserve) and historic landscape where appropriate. In addition, we do not feel that the presumption should be made that the length of the Monmouthshire and Brecon Canal returned to navigable use is necessarily a good sustainability indicator or one which is relevant to the plan. A more appropriate indicator would be one which looked at the canal in a more holistic sense and recognised its value to tourism through walking/cycling, nature conservation and other water based recreation as well as its function as a navigation route.

25 & 26 CCW welcome the inclusion of indicators for green travel planning and the incorporation of Sustrans routes within developments.

Appendix C - Strategic Options Appraisal

C.1 Housing Numbers

Table C.1 – Housing Numbers

SA Objectives	HN1 SEWSPG Apportionment The currently agreed figure in the SEWSPG Memorandum of Understanding of March 2007 is 800 dwellings per year. This would represent a continuation of the growth trend incorporated in the adopted UDP. (The requirement for the period 2006-11 is 740pa). This figure, agreed by Newport City Council, has status as an option to be considered alongside any other viable options. It only covers the period to 2021, but if it is extrapolated to 2026, this would produce a population of 164,500, a 17% increase on 2006.		HN2 Population Trend Growth A projection of population and household growth based on recent trends, notably of migration, produces an annual requirement of about 600 dwellings and a population of 156,800, an increase of 12% on 2006.		HN3 House Building Trend Growth Since the mid 1990s, house building rates averaged over a 5 year period have varied from 380 to 520. A continuation of this trend would be for an average rate of 450 dwellings per year.		Comparison of the Options
	Score	Comments	Score	Comments	Score	Comments	
Scale of Effect (SE): 0 – no effect; +++ strongly positive; ++ moderately positive; + slightly positive; ? effect unknown/unable to be predicted at this stage --- strongly negative; -- moderately negative; - slightly negative							
ENVIRONMENTAL							
1	Protect and enhance existing valued landscapes and open spaces and encourage their sustainable use, enjoyment and management	--	An increase in housing development will likely place further pressure on the landscape from built development, as well as increase traffic levels and users in the countryside, which may have a negative cumulative effect.	--	An increase in housing development will likely place further pressure on the landscape from built development, as well as increase traffic levels and users in the countryside which may have a negative cumulative effect.	-	An increase in housing development will likely place further pressure on the landscape from built development, as well as increase traffic levels and users in the countryside which may have a negative cumulative effect.	Option HN3 is likely to have the least significant negative effect on the landscape as it will likely produce the smallest amount of growth in housing and subsequent population.
2	To protect, manage and enhance	--	An increase in housing development is likely to place increased	--	An increase in housing development is likely to place increased	-	An increase in housing development is likely to place increased	Option HN3 is likely to have the least significant negative effect on the landscape as it

	biodiversity		pressure on important habitats and species from the effects of development as well as cumulative effects of increases in traffic, people movement, pets and other pollution.		pressure on important habitats and species from the effects of development as well as cumulative effects of increases in traffic, people movement, pets and other pollution.		pressure on important habitats and species from the effects of development as well as cumulative effects of increases in traffic, people movement, pets and other pollution.	will likely produce the smallest amount of growth in housing and subsequent population.
3	To ensure efficient use of land and protect geodiversity, soil quality and mineral resources	--	The location and materials to be used in the construction of housing development is not specified in this option, although an increase in the development of housing is likely to place pressure on mineral resources.	--	The location and materials to be used in the construction of housing development is not specified in this option, although an increase in the development of housing is likely to place pressure on mineral resources.	-	The location and materials to be used in the construction of housing development is not specified in this option, although an increase in the development of housing is likely to place pressure on mineral resources.	Option HN3 is likely to place least pressure on the environment due to the prediction of a smaller amount of development. LDP Objective 1 will also seek to make the best use of resources, which may minimise the effects from the options.
4	To improve air quality	--	An increase in housing development is likely to lead to an increase in traffic levels. Construction activities will also reduce air quality during works.	--	An increase in housing development is likely to lead to an increase in traffic levels. Construction activities will also reduce air quality during works.	-	An increase in housing development is likely to lead to an increase in traffic levels. Construction activities will also reduce air quality during works.	Option HN3 is likely to place least pressure on the environment due to the prediction of a smaller amount of development.
5	To reduce emissions of greenhouse gases	--	An increase in built development in itself will increase greenhouse gas emissions. An increase in associated traffic will also contribute to a greater cumulative effect.	--	An increase in built development in itself will increase greenhouse gas emissions. An increase in associated traffic will also contribute to a greater cumulative effect.	-	An increase in built development in itself will increase greenhouse gas emissions. An increase in associated traffic will also contribute to a greater cumulative effect.	Option HN3 is likely to place least pressure on the environment due to the prediction of a smaller amount of development. Objective 2 of the LDP may reduce these effects, however, as it seeks to minimise the causes of climate change, which includes greenhouse gas emissions.
6	To minimise	--	The options for growth	-	The options for growth	-	The options for growth	Option HN3 is predicted to have the least impact on

	noise pollution		do not outline the location of the proposed development, so the impacts on neighbours are uncertain. However, increases in house-building will likely lead to an increase in noise pollution from construction activities and traffic increases.		do not outline the location of the proposed development, so the impacts on neighbours are uncertain. However, increases in house-building will likely lead to an increase in noise pollution from construction activities and traffic increases.		do not outline the location of the proposed development, so the impacts on neighbours are uncertain. However, increases in house-building will likely lead to an increase in noise pollution from construction activities and traffic increases.	noise pollution, through less construction activity and the likelihood that less traffic will be generated by a smaller amount of development.
7	To maintain and, where possible, enhance water quality	+	The location and construction methods/ infrastructure provision of development is not outlined in the option. However, objective 5 of the LDP seeks to protect and enhance the natural environment, which will include water quality.	+	The location and construction methods/ infrastructure provision of development is not outlined in the option. However, objective 5 of the LDP seeks to protect and enhance the natural environment, which will include water quality.	+	The location and construction methods/ infrastructure provision of development is not outlined in the option. However, objective 5 of the LDP seeks to protect and enhance the natural environment, which will include water quality.	Effects are unknown so a comparison of options against this objective is not possible at this stage.
8	To reduce water consumption	--	An increase in development, especially housing, will lead to a significant increase in water consumption. However, objective 1 of the LDP seeks that development makes the best use of resources, which may enable a minimisation of this increase.	--	An increase in development, especially housing, will lead to a significant increase in water consumption. However, objective 1 of the LDP seeks that development makes the best use of resources, which may enable a minimisation of this increase.	-	An increase in development, especially housing, will lead to a significant increase in water consumption. However, objective 1 of the LDP seeks that development makes the best use of resources, which may enable a minimisation of this increase.	Option HN3 is likely to place least pressure on the environment due to the prediction of a smaller amount of development.
9	To minimise the risk of and from flooding	--	An increase in development will increase the amount of hard-surfacing and thus increase the risk of	--	An increase in development will increase the amount of hard-surfacing and thus increase the risk of	-	An increase in development will increase the amount of hard-surfacing and thus increase the risk of	The option that will generate the least amount of new development will create a lesser flood risk comparatively.

			flooding. An increase in population will increase the risk from flooding to people and property. LDP objective 2 will help to minimise this effect through mitigation of the impacts and contributions to climate change.		flooding. An increase in population will increase the risk from flooding to people and property. LDP objective 2 will help to minimise this effect through mitigation of the impacts and contributions to climate change.		flooding. An increase in population will increase the risk from flooding to people and property. LDP objective 2 will help to minimise this effect through mitigation of the impacts and contributions to climate change.	
10	Increase energy efficiency	++	Construction methods and design are not included as part of the option. However, LDP objective 1 seeks to make the best use of resources, which will include energy efficiency.	+	Construction methods and design are not included as part of the option. However, LDP objective 1 seeks to make the best use of resources, which will include energy efficiency.	+	Construction methods and design are not included as part of the option. However, LDP objective 1 seeks to make the best use of resources, which will include energy efficiency.	It is likely that all development will result in similar levels of energy efficiency, although a larger amount of development may increase the potential for energy savings to be made.
11	Promote renewable energy production and use	++	Construction methods and design are not included as part of the option. However, LDP objective 1 seeks to make the best use of resources, which will likely include the production of renewable energy. .	+	Construction methods and design are not included as part of the option. However, LDP objective 1 seeks to make the best use of resources, which will likely include the production of renewable energy. .	+	Construction methods and design are not included as part of the option. However, LDP objective 1 seeks to make the best use of resources, which will likely include the production of renewable energy. .	It is likely that Option HN1, which will generate the greatest amount of development, will offer the greatest increase in the potential for the generation of renewable energy.
12	Promote the reduction of waste generation and landfill, and increase levels of recycling to achieve more sustainable waste management	+	Construction methods and design are not included as part of the option. However, objective 1 of the LDP seeks to make the best use of resources, which will include sustainable waste management.	+	Construction methods and design are not included as part of the option. However, objective 1 of the LDP seeks to make the best use of resources, which will include sustainable waste management.	+	Construction methods and design are not included as part of the option. However, objective 1 of the LDP seeks to make the best use of resources, which will include sustainable waste management.	Option HN1 is likely to generate the most potential for supporting sustainable waste management facilities. However, the options which will deliver smaller population figures are likely to generate a lesser amount of waste, which may mean that sustainable waste

								management is easier to manage and places the least pressure on landfill resources,
13	Promote sustainable, high quality design in all development to contribute to a higher quality built and natural environment whilst adapting to the potential impacts of climate change	?	Construction methods and design are not included as part of the option.	?	Construction methods and design are not included as part of the option.	?	Construction methods and design are not included as part of the option.	Effects are unknown so a comparison of options against this objective is not possible at this stage.
SOCIAL								
14	Improve equality of opportunities amongst all social groups	+++	Provision to match the SEWSPG growth trend is likely to increase the provision of affordable and mixed types and tenures of housing. Objective 4 of the LDP seeks that housing provision meets the needs of the local population, so affordable housing will be a likely requirement of development.	++	Provision to match population growth is likely to increase the provision of affordable and mixed types and tenures of housing, and meet the needs of the population. Objective 4 of the LDP seeks that housing provision meets the needs of the local population, so affordable housing will be a likely requirement of development.	+	The provision of dwellings is likely to increase the provision of affordable and mixed types and tenures of housing. Objective 4 of the LDP seeks that housing provision meets the needs of the local population, so affordable housing will be a likely requirement of development.	Option HN1 will generate the greatest number of dwellings and thus is likely to have the greatest effect in terms of this objective. This is as a greater amount of development is likely to increase the planning requirement for more of the new housing to meet the needs of the local population.
15	Improve the health and wellbeing of the population	?	The design and standards of housing are not considered as part of this option. However, Objective 4 of the LDP seeks that housing provision meets the needs of the	?	The design and standards of housing are not considered as part of this option. However, Objective 4 of the LDP seeks that housing provision meets the needs of the	?	The design and standards of housing are not considered as part of this option. However, Objective 4 of the LDP seeks that housing provision meets the needs of the	Effects are unknown so a comparison of options against this objective is not possible at this stage.

			population, which may include health requirements although this is unclear at this stage.		population, which may include health requirements although this is unclear at this stage.		population, which may include health requirements although this is unclear at this stage.	
16	Protect and provide improved local, social, recreational and leisure facilities for all sectors of the community, and improve access to them	?	The increased provision of housing could either increase pressure on existing services and facilities, or lead to the creation of new services and facilities as part of new development, depending upon agreements and development control policies.	?	The increased provision of housing could either increase pressure on existing services and facilities, or lead to the creation of new services and facilities as part of new development, depending upon agreements and development control policies.	?	The increased provision of housing could either increase pressure on existing services and facilities, or lead to the creation of new services and facilities as part of new development, depending upon agreements and development control policies.	Effects are unknown so a comparison of options against this objective is not possible at this stage.
17	Improve the quantity, quality, variety and affordability of housing	+++	Provision to match the SEWSPG growth trend is likely to increase the provision of affordable and mixed types and tenures of housing. Objective 4 of the LDP seeks that housing provision meets the needs of the local population, so affordable housing will be a likely requirement of development.	++	Provision to match population growth is likely to increase the provision of affordable and mixed types and tenures of housing, and meet the needs of the population. Objective 4 of the LDP seeks that housing provision meets the needs of the local population, so affordable housing will be a likely requirement of development.	+	The provision of dwellings is likely to increase the provision of affordable and mixed types and tenures of housing. Objective 4 of the LDP seeks that housing provision meets the needs of the local population, so affordable housing will be a likely requirement of development.	Option HN1 will generate the greatest number of dwellings and thus is likely to have the greatest effect in terms of this objective. This is as a greater amount of development is likely to increase the planning requirement for more of the new housing to meet the needs of the local population.
18	To contribute to a reduction in crime and social disorder and the fear of crime, promoting safer neighbourhoods	?	New development could create the potential for the use of Secured by Design principles, which may reduce crime and the fear of it. However, at this stage the design of development and possible provision of services and facilities is	?	New development could create the potential for the use of Secured by Design principles, which may reduce crime and the fear of it. However, at this stage the design of development and possible provision of services and facilities is	?	New development could create the potential for the use of Secured by Design principles, which may reduce crime and the fear of it. However, at this stage the design of development and possible provision of services and facilities is	Effects are unknown so a comparison of options against this objective is not possible at this stage.

			not detailed in the option.		not detailed in the option.		not detailed in the option.	
19	To conserve and enhance the historic environment of Newport	?	LDP objective 5 seeks to enhance the built and natural environment, and will therefore seek that new development enhances the historic environment. However, the magnitude of this effect is unknown, as the location of proposed development and its design is not included as part of the option. If large developments, meeting most sustainability objectives, were to be located adjacent to historical areas, it is likely that the scale of development would have a negative effect on historical character. If a large amount of housing were located close to historical areas that was considered to meet other objectives, negative effects may ensue.	?	LDP objective 5 seeks to enhance the built and natural environment, and will therefore seek that new development enhances the historic environment. However, the magnitude of this effect is unknown, as the location of proposed development and its design is not included as part of the option. If a large amount of housing were located close to historical areas that was considered to meet other objectives, negative effects may ensue.	?	LDP objective 5 seeks to enhance the built and natural environment, and will therefore seek that new development enhances the historic environment. However, the magnitude of this effect is unknown, as the location of proposed development and its design is not included as part of the option. If a large amount of housing were located close to historical areas that was considered to meet other objectives, negative effects may ensue.	Potential effects could be positive or negative, dependent on more detailed policy considerations.
20	To identify, promote, strengthen and enhance the cultural identity of Newport	?	It is unlikely that housing development will lead to an increase in cultural identity, and the types of residents attracted cannot be predicted effectively.	?	It is unlikely that housing development will lead to an increase in cultural identity, and the types of residents attracted cannot be predicted effectively.	?	It is unlikely that housing development will lead to an increase in cultural identity, and the types of residents attracted cannot be predicted effectively.	Effects are unknown so a comparison of options against this objective is not possible at this stage.
ECONOMIC								

21	To enable high and stable levels of local employment in Newport	+/-	An increase in population may attract employers to the area and thus lead to an increase in employment levels. However, if this is not the case, unemployment could increase, through an overprovision of housing without employment opportunities to match.	+/-	An increase in population may attract employers to the area and thus lead to an increase in employment levels. However, if this is not the case, unemployment could increase, through an overprovision of housing without employment opportunities to match.	+/-	An increase in population may attract employers to the area and thus lead to an increase in employment levels. However, if this is not the case, unemployment could increase, through an overprovision of housing without employment opportunities to match.	It is unclear which of the options would be best under this objective, as the outcome will be dependent on the level of employment opportunities generated from development or that are presently available for new residents.
22	To support diverse and viable business growth and to achieve economic growth to contribute to business competitiveness, focusing on inward investment	++	Housing growth is unlikely to affect business competitiveness and growth, although investment in housing infrastructure is likely to attract inward investment and growth in the local economy.	++	Housing growth is unlikely to affect business competitiveness and growth, although investment in housing infrastructure is likely to attract inward investment and growth in the local economy.	+	Housing growth is unlikely to affect business competitiveness and growth, although investment in housing infrastructure is likely to attract inward investment and growth in the local economy.	The option that will generate the greatest amount of housing is likely to have the greatest effect on this objective.
23	To enhance the profile of Newport, and strengthen the tourist economy, sensitively capitalising on environmental, heritage, and leisure assets	0	No obvious effects	0	No obvious effects	0	No obvious effects	
24	To contribute to educational attainment and increase skill levels to	0	No obvious effects	0	No obvious effects	0	No obvious effects	

	promote/ develop a knowledge based economy							
25	Reducing the need to travel by improving local service provision	?	The increased provision of housing could lead to the creation of new services and facilities as part of new development, depending upon agreements and development control policies.	?	The increased provision of housing could lead to the creation of new services and facilities as part of new development, depending upon agreements and development control policies.	?	The increased provision of housing could lead to the creation of new services and facilities as part of new development, depending upon agreements and development control policies.	Effects are unknown so a comparison of options against this objective is not possible at this stage.
26	Promote attractive and viable alternatives to car transport to achieve a modal shift to more sustainable modes of transport, including walking and cycling	?	The location of proposed development and access arrangements are not included as part of the option. However, the recommended objective to reduce the need to travel is likely to increase walking and cycling to cover shorter distances. The potential magnitude of this effect is unknown at this stage.	?	The location of proposed development and access arrangements are not included as part of the option. However, the recommended objective to reduce the need to travel is likely to increase walking and cycling to cover shorter distances. The potential magnitude of this effect is unknown at this stage.	?	The location of proposed development and access arrangements are not included as part of the option. However, the recommended objective to reduce the need to travel is likely to increase walking and cycling to cover shorter distances. The potential magnitude of this effect is unknown at this stage.	The scale of potential effects is unknown so a comparison of options against this objective is not possible at this stage.
27	To seek to improve the vitality and viability of the City Centre	+++	An increase in development of housing will increase the catchment population for the city centre, thus increasing its vitality and viability.	++	An increase in development of housing will increase the catchment population for the city centre, thus increasing its vitality and viability.	+	An increase in development of housing will increase the catchment population for the city centre, thus increasing its vitality and viability. This effect will be minimal as part of this option.	The largest population increase, predicted as part of HN1, is likely to have the largest effect on this objective.

C.2 Housing Delivery

Table C.2 – Housing Delivery

SA Objectives		HD1 Do Nothing Support development of sites already committed within the planning process. No additional allocations to be supported.		HD2 Market-led • Various peripheral extensions to the city, responding to the market. • Added existing allocations may result in an oversupply with the market determining which land was developed. • Population change dependent on level of building occurring.		HD3 New Markets • Allow for further changes in the housing market including the potential need for the development of small flats and apartments, which are currently under-represented. These could provide housing for graduates and older couples. • Other trends that might become apparent could include a greater demand for live-work units as IT facilitates greater home-working and as costs, congestion and climate change concerns discourage commuting.		Comparison of the Options
		Score	Comments	Score	Comments	Score	Comments	
Scale of Effect (SE): 0 – no effect; +++ strongly positive; ++ moderately positive; + slightly positive; ? effect unknown/unable to be predicted at this stage --- strongly negative; -- moderately negative; - slightly negative								
ENVIRONMENTAL								
1	Protect and enhance existing valued landscapes and open spaces and encourage their sustainable use, enjoyment and management	?	An increase in development may lead to the harm or protection of landscapes, depending upon the location of the allocations. The existing allocations should be subject to SA before being carried forward if	---	Development on extensions to the city is likely to have significantly detrimental effects on the surrounding landscape.	++	The potential for the development of apartments in the city centre may help to increase the provision of dwellings of high density, making efficient use of land and reducing the need to travel. An increase in home-	Option HD3 is predicted to have the most beneficial effects against this objective as it will enable the efficient use of land and minimise the need for land-take to develop transport infrastructure through

			this option is to proceed.				working through live/work units is also likely to have beneficial effects for landscape value, through a reduced need for transport infrastructure through reducing the need to travel.	a reduced need to travel.
2	To protect, manage and enhance biodiversity	+	The HRA process, alongside the LDP objectives, is likely to ensure that any allocations taken forward are unlikely to affect sites which are highly sensitive from a biodiversity perspective.	--	Development on extensions to the city is likely to have significantly detrimental effects on surrounding habitats. However, this effect will be minimised through the HRA process and implementation of the LDP objectives.	++	The potential for the development of apartments in the city centre may help to increase the provision of dwellings without the need to develop on or in close proximity to important wildlife habitats. An increase in home-working through live/work units is also likely to have beneficial effects for the same reasons.	Option HD3 is predicted to have the most beneficial effects against this objective.
3	To ensure efficient use of land and protect geodiversity, soil quality and mineral resources	?	LDP objective 1 seeks to ensure that all development makes the best use of land and resources. However, the magnitude of this effect is currently unknown, and the existing allocations should be subject to SA before being carried forward to ensure that there are no predicted significant negative effects..	--	The development of extensions to the city is likely to have significantly negative effects on soil resources, and will likely lead to the development of valuable agricultural land. However, objective 1 of the LDP should minimise this negative effect.	+++	The development of smaller dwellings in high-density blocks such as apartments is likely to generate a lesser requirement for mineral resources, and is considered to be an efficient use of land.	Option HD3 is predicted to have the most beneficial effects against this objective as it generates the most efficient use of land and resources.
4	To improve air quality	-	New development is likely to increase air pollution; however, the	+/-	An increase in development in peripheral locations is likely to lead	+/-	The location of apartments in more urban locations is likely	All three options are likely to decrease air quality as they will

			magnitude of this effect is currently unknown. The existing allocations should be subject to SA before being carried forward to ensure that there are no predicted significant negative effects..		to an increase in car-based traffic and thus have a detrimental impact on local air quality. Additionally, a loss of vegetation to development may lead to a loss of pollution sequestration. However, the location of development is likely to have good air quality at present, so the impact of development may be absorbed by remaining vegetation.		to reduce the need to travel, and minimise the increase in traffic from the increased population. A similar effect is likely to arise from the development of live/work units. However, an increase in density in the urban area is likely to increase pollution to air overall, increasing the intensity of what may already be a polluted area, through an overall increase in traffic and other pollutants from infrastructure and development.	increase development and therefore traffic and a loss of vegetation. HD3 may enable a minimisation of this effect through reducing the need to travel in some cases. HD2 may have a reduced effect due to the absorption capacity of the receiving environment.
5	To reduce emissions of greenhouse gases	-	New development is likely to increase greenhouse gas emissions. However, the magnitude of this effect is currently unknown. Additionally, objective 2 of the LDP will seek to minimise this effect. The existing allocations should be subject to SA before being carried forward to ensure that there are no predicted significant negative effects.	--	An increase development in peripheral locations is likely to lead to an increase in car-based traffic and thus have a detrimental impact on greenhouse gas emissions. Furthermore, carbon sink capacity from vegetation may be lost through the development of natural greenspace areas in this option. Objective 2 will minimise this effect.	++	The location of apartments in more urban locations is likely to reduce the need to travel, and minimise the increase in traffic from the increased population and subsequent greenhouse gas emissions. A similar effect is likely to arise from the development of live/work units. The development of high density development such as apartments also creates potential for increased viability of sustainable design methods and energy efficient technologies.	Option HD3 is predicted to have the most beneficial effects against this objective as it has potential to minimise the greenhouse gas emissions through design.

6	To minimise noise pollution	-	New development is likely to increase noise pollution. However, the magnitude of this effect is currently unknown. The existing allocations should be subject to SA before being carried forward to ensure that there are no predicted significant negative effects.	--	The development of housing in peripheral locations is likely to have negative effects on noise pollution as associated traffic and construction works will generate noise in undisturbed locations.	-	It is likely that urban developments will be in locations which are less sensitive to noise than more peripheral locations. However, some noise pollution will still result from construction and an increase in traffic.	Options HD1 and HD3 are likely to generate less noise pollution compared with option HD2.
7	To maintain and, where possible, enhance water quality	+	Objective 5 of the LDP seeks that development does not adversely effect the natural environment, which will include water quality. However, existing allocations should be subject to SA before being carried forward to ensure that there are no predicted significant negative effects.	+	Development in peripheral locations may affect water quality through the loss of permeable surfaces and increase in surface water run off which may contain pollutants and enter watercourses or groundwater. Very rural areas are also unlikely to contain the necessary infrastructure for development, such as for drainage, and so construction activities are likely to be damaging. However, this effect may be minimised through the implementation of objective 5 of the LDP which seeks that development does not adversely affect the natural environment.	+	An increase in development may affect water quality through the increased loss of permeable surfaces and increase in surface water run off which may contain pollutants and enter watercourses or groundwater. However, this effect may be minimised through the implementation of objective 5 of the LDP which seeks that development does not adversely affect the natural environment.	All three options may have similar effects on water quality, depending on the successful implementation of objective 5 of the LDP.
8	To reduce water consumption	0	The location of development is unlikely to affect water	0	The location of development is unlikely to affect water consumption	0	The location of development is unlikely to affect water	

			consumption directly.		directly.		consumption directly.	
9	To minimise the risk of and from flooding	--	Although an increase in hardstanding is likely to lead to an increase in flooding, some of the allocations are likely to be on previously developed land, which may minimise this effect. LDP objective 2 may minimise this effect through mitigation measures.	--	Development in peripheral locations is likely to lead to a loss of greenfield land, which may increase surface water run-off and the risk of and from flooding. LDP objective 2 may minimise this effect through mitigation measures.	-	An increase in residential development will increase the risk from flooding to people and property. This risk may be minimised through the development of apartment type development, which may mean that residential accommodation is not sited at ground level.	Option HD3 is likely to have a lesser impact on flood risk in terms of the generation of an increase in surface water. However, flood zones require that each site is assessed on a case by case basis. LDP objective 2 should seek to minimise these effects.
10	Increase energy efficiency	?	It is unknown whether or not current allocations have the potential for energy efficiency, although objective 1 of the LDP seeks that the best use of resources is enabled, which may contribute to this objective.	+++	Development in peripheral locations may help to increase energy efficiency, as developing from a 'blank canvass' may give more scope for improving passive energy amongst others. Implementation of the LDP objectives, including making the best use of resources, should reinforce this.	++	Development of high density development may increase the potential for the implementation of energy efficient technologies through increased viability. Implementation of the LDP objectives, including making the best use of resources, should reinforce this.	Option HD2 may have more potential in terms of energy efficient development in-situ. Option HD3 may have the greatest potential to incorporate energy efficient design in new development.
11	Promote renewable energy production and use	?	Current allocations may be closer to existing dwellings or be developed at a higher density, which may allow the sharing of energy efficient technologies such as CHP. Objective 1 of the LDP seeks that the best use of resources is enabled, which may contribute to	+++	Development in peripheral locations may increase the potential for in-situ energy efficiency as open spaces may increase the potential for harnessing solar and wind energy as well as geothermal. Implementation of the LDP objectives, including making the best use of	++	Developments developed at a higher density, may allow the sharing of energy efficient technologies such as CHP. Implementation of the LDP objectives, including making the best use of resources, should reinforce this.	Option HD2 may increase the potential for the generation of renewable energy technologies on site.

			this objective.		resources, should reinforce this.			
12	Promote the reduction of waste generation and landfill, and increase levels of recycling to achieve more sustainable waste management	+	The promotion of sustainable waste management may be dependent on the location of facilities in relation to development. The objective to make the best use of resources should ensure that sustainable waste management is encouraged.	+	The promotion of sustainable waste management may be dependent on the location of facilities in relation to development. The objective to make the best use of resources should ensure that sustainable waste management is encouraged.	++	Development of apartments may increase the viability of sustainable waste management facilities on site which could enable the movement of waste up the hierarchy. The objective to make the best use of resources should ensure that sustainable waste management is encouraged.	Option HD3 is predicted to have the most beneficial effects against this objective.
13	Promote sustainable, high quality design in all development to contribute to a higher quality built and natural environment whilst adapting to the potential impacts of climate change	?	The design and location of development is unknown. However, objective 2 of the LDP seeks to minimise and mitigate climate change impacts, which should enable contribution towards this objective. All sites to be carried forward should be subject to SA before being confirmed.	+/-	The development of peripheral sites subject to market demands is unlikely to lead to highly sustainable built development, and will likely increase the impacts on climate change through a loss of greenspace and increase in traffic amongst other factors. However, objective 2 of the LDP seeks to minimise and mitigate climate change impacts, which should enable contribution towards this objective.	++	The development of housing in more sustainable locations will increase the potential for the development of more sustainable design.	Option HD3 may give rise to the development of more sustainable design through its more sustainable location.
SOCIAL								
14	Improve equality of opportunities amongst all social groups	?	The type of housing development is unknown. However, objective 4 of the LDP may provide beneficial	+/-	Responding only to market demand, it is likely that an improvement in quality of opportunity will not improve, and may	++	The potential development of apartments to respond to market conditions such as the provision of	Option HD3 is predicted to have the most beneficial effects against this objective, which may be further

			effects through the requirement of housing that meets the needs of the local population. All sites to be carried forward should be subject to SA before being confirmed.		even become more exacerbated. However, objective 4 of the LDP may minimise this effect through the requirement of housing that meets the needs of the local population.		smaller dwellings for older people or younger graduates, may increase equitable access to the housing market. Locating development in more urban locations will increase accessibility to local services and facilities increase equitable access to these amenities.	increased through the application of objective 4.
15	Improve the health and wellbeing of the population	?	The type of housing development is unknown. However, objective 4 of the LDP may provide beneficial effects through the requirement of housing that meets the needs of the local population. All sites to be carried forward should be subject to SA before being confirmed.	++	Development in peripheral locations may help to improve the health and wellbeing of the community through a potential increase in access to greenspace for informal physical activity.	++	Development in sustainable locations may lead to an increase in health and wellbeing through ease of access to health and leisure facilities. Additionally, the creation of new dwellings for older people may improve the quality of their housing, and perhaps a sense of community, which may improve health levels also.	All three options have the potential to improve the health and wellbeing of the population in different ways.
16	Protect and provide improved local, social, recreational and leisure facilities for all sectors of the community, and improve access to them	+	The allocations may lead to an increased provision of community facilities, in accordance with objective 6 of the LDP.	+/-	The development of housing in peripheral locations is likely to decrease access to facilities which are likely to be provided in urban centres. However, the allocations may lead to an increased provision of community facilities, in accordance with objective 6 of the LDP.	+++	Locating development in more urban locations will increase accessibility to local services and facilities. Objective 6 may also increase their provision.	Option HD3 is likely to enable more sustainable development against this objective.
17	Improve the quantity, quality,	?	The location of housing may affect affordability through the viability of	?	The location of housing may affect affordability through the viability of	++	The provision of smaller residential accommodation may	Option HD3 is predicted to have the most beneficial effects

	variety and affordability of housing		certain land to generate affordable units. Objective 4 of the LDP will seek to ensure that the needs of the local population are met, although doesn't specify in which locations. The allocations should be subject to SA and their viability for affordable housing provision prior to being carried forward.		certain land to generate affordable units. Objective 4 of the LDP will seek to ensure that the needs of the local population are met, although doesn't specify in which locations. Allocations in rural areas may or may not have increased values compared to other areas.		lead to more affordable housing development.	against this objective.
18	To contribute to a reduction in crime and social disorder and the fear of crime, promoting safer neighbourhoods	?	The location of the allocations and their design is currently unknown. Implementation of objectives 4 and 6 may help to reduce crime and the fear of it through meeting the needs of the population.	++	The development of housing in peripheral locations may reduce crime levels through an increase in access to open space and therefore an increase in potential activities. Implementation of objectives 4 and 6 may help to reduce crime and the fear of it through meeting the needs of the population.	++	If site allocations are in close proximity to services and facilities, this may reduce crime levels, through an increase in natural surveillance as well as an increase in amenities to occupy potential criminals. Implementation of objectives 4 and 6 may help to reduce crime and the fear of it through meeting the needs of the population.	Options HD2 and HD3 are likely to reduce crime levels through a potential increase in access to services and facilities and the meeting of the needs of the community through housing provision.
19	To conserve and enhance the historic environment of Newport	+	This will be dependent on the exact location, scale and design of development. However, effects are likely to be positive, through objective 5 of the LDP.	+	This will be dependent on the exact location, scale and design of development. However, effects are likely to be positive, through objective 5 of the LDP.	+	This will be dependent on the exact location, scale and design of development. However, effects are likely to be positive, through objective 5 of the LDP.	All three options are likely to have similarly beneficial effects on the historic environment through implementation of the LDP objectives.
20	To identify, promote, strengthen and enhance the cultural identity of	0	No obvious effects	0	No obvious effects	0	No obvious effects	

	Newport							
ECONOMIC								
21	To enable high and stable levels of local employment in Newport	?	The existing allocations are unknown. If it is the case, the development of existing allocations may improve employment rates though an increase in workforce in close proximity to employment areas. This assumes that employment opportunities will match the provision of housing.	+	Responding to market conditions for housing may improve the attractiveness of Newport and increase the number of skilled workers attracted to the area, which could improve employment rates.	++	The development of apartments to enable the retention of graduates, or the development of live/work units is likely to improve levels of employment in the plan area.	Option HD3 may provide increased benefits in terms of employment rates.
22	To support diverse and viable business growth and to achieve economic growth to contribute to business competitiveness, focusing on inward investment	+	The development of housing in existing allocations will likely increase investment in the area and may improve the economy.	++	Responding to market conditions for housing may improve the attractiveness of Newport and increase inward investment.	+++	Responding to market conditions for housing, including the development of live/work units, may improve the attractiveness of Newport and increase inward investment to a large degree through diversifying industry in the city.	Option HD3 may provide increased benefits in terms of employment rates.
23	To enhance the profile of Newport, and strengthen the tourist economy, sensitively capitalising on environmental, heritage, and leisure assets	0	No obvious effects.	0	No obvious effects.	0	No obvious effects.	

24	To contribute to educational attainment and increase skill levels to promote/develop a knowledge based economy	0	No obvious effects.	0	No obvious effects.	+	An increase in the provision of housing for graduates may increase the potential for the development of a knowledge-based economy.	Option HD3 may provide increased benefits against this objective.
25	Reducing the need to travel by improving local service provision	+	Existing allocations are unknown, and should be subject to SA prior to carrying forward. If allocations are in more urban locations, they are likely to reduce the need to travel, in accordance with the SA recommended objective for the LDP. Increased local service provision is also likely to increase through the implementation of objective 6.	+/-	The development of peripheral locations is likely to increase the need to travel. This effect may be minimised through the implementation of the LDP objective recommended for inclusion by the SA. Increased local service provision is also likely to increase through the implementation of objective 6	+++	Allocations in more urban locations are likely to reduce the need to travel; the development of live/work units will also enable a reduced need to travel. Increased local service provision is also likely to increase through the implementation of objective 6	Option HD3 is likely to provide more benefits against this objective.
26	Promote attractive and viable alternatives to car transport to achieve a modal shift to more sustainable modes of transport, including walking and cycling	?	Existing allocations are unknown, and should be subject to SA prior to carrying forward. If allocations are in more urban locations are likely to enable a shift to more sustainable modes of transport.	--	Development in peripheral locations is likely to be counter-productive to this objective.	++	Allocations in more urban locations are likely to enable a shift to more sustainable modes of transport; the development of live/work units will also enable a reduced need to travel.	Option HD3 is likely to provide more benefits against this objective.
27	To seek to improve the vitality and viability of the	?	Existing allocations are unknown, and should be subject to SA prior to carrying forward. If	--	Development in peripheral locations is likely to be counter-productive to this	+++	The development of accommodation in apartments may increase the population	Option HD3 is likely to provide more benefits against this objective.

	City Centre		allocations are in more urban locations are likely to improve the vitality and viability of the city centre.		objective.		in the city centre, increasing footfall and thus the vitality and viability of this area.	

C.3 Accommodation for Students and Young People

Table C.3 – Accommodation for Students and Young People

SA Objectives		Y1 Do Nothing Make no special provision either for students or to try and increase the proportion living and working in the city after graduation.		Y2 To Seek the Provision of More Student Accommodation While the powers of the local planning authority are limited with respect to controlling studentification, a more proactive encouragement of desirable forms of development may limit the growth of less desirable forms.		Y3 To Encourage City Centre Accommodation Attractive to Young People Provision of modern apartments for the retention of young people in an area, and especially graduates.		Comparison of the Options
		Score	Comments	Score	Comments	Score	Comments	
Scale of Effect (SE): 0 – no effect; +++ strongly positive; ++ moderately positive; + slightly positive; ? effect unknown/unable to be predicted at this stage --- strongly negative; -- moderately negative; - slightly negative								
ENVIRONMENTAL								
1	Protect and enhance existing valued landscapes and open spaces and encourage their sustainable use, enjoyment and management	0	No obvious direct effects	0	No obvious direct effects	0	No obvious direct effects	
2	To protect, manage and enhance biodiversity	0	No obvious direct effects	0	No obvious direct effects	0	No obvious direct effects	
3	To ensure efficient use of land and	0	No obvious direct effects	?	An encouragement of certain types of development may	+/-	An encouragement of an increase in development may	Option Y1 is likely to place the least pressure on soil and mineral resources.

	protect geodiversity, soil quality and mineral resources				place increased pressure on mineral resources. However, there is insufficient information to enable an assessment of this effect to be made.		place increased pressure on mineral resources. Implementation of objective 1 of the LDP may minimise this effect. Additionally, the development of high density accommodation is considered an efficient use of land.	However, Option Y3 may generate development that makes efficient use of land.
4	To improve air quality	0	No obvious direct effects	-	An encouragement of certain types of development may encourage an increased population, and thus increase traffic which may have negative effects on air quality. Encouraging desirable forms of development however, may limit this effect.	-	Providing modern apartments in 'attractive settings' may encourage an increased population, and thus increase traffic which may have negative effects on air quality. Locating the apartments in the city centre is likely to reduce the need to travel, minimising this impact.	Both options Y2 and Y3 may lead to a growth in population, which may lead to increased traffic and deterioration in air quality. The active encouragement of retention of students may have greater effects to this end. Therefore, option Y1 is likely to have the least effect on this option.
5	To reduce emissions of greenhouse gases	0	No obvious direct effects	-	An encouragement of increased development will increase greenhouse gas emissions from buildings, traffic as well as through a lack of greenspace. However, the encouragement of desirable forms of development may decrease this effect, as will objective 2 of the LDP.	-	Providing modern apartments in the city centre may encourage increased population, and thus increased traffic and buildings which will increase greenhouse gas emissions. However, the location of the apartments in the city centre may minimise the loss of greenfield land and reduce the need to	Both options Y1 and Y2 may lead to an increase in built development, as well as traffic and potentially the loss of greenfield land. However, option Y2 is likely to have greater negative effects on greenhouse gas emissions, dependent on the design of development for both options. Option Y1 will have the least effect. Objective 2 of the LDP is likely to ensure

							travel, minimising the effects from this option.	that the effects are minimised.
6	To minimise noise pollution	0	No obvious direct effects	++	Taking a proactive stance against less desirable forms of development will help to minimise potential noise pollution from student accommodation.	++	Locating development in the city centre in apartments may minimise the effect of noise on more sensitive areas of the plan area.	Taking a proactive approach to the location and form of development may help to minimise noise pollution. Options Y2 and Y3 provide benefits against this option.
7	To maintain and, where possible, enhance water quality	0	No obvious direct effects	0	No obvious direct effects	0	No obvious direct effects	
8	To reduce water consumption	0	No obvious direct effects	-	An encouragement of certain types of development may encourage an increased population, and thus increase water consumption. This effect may be minimised through implementation of objective 1 which seeks to make the best use of resources.	-	Actively encouraging the retention and attraction of students and young people is likely to increase the population and thus increase water consumption. This effect may be minimised through implementation of objective 1 which seeks to make the best use of resources.	The 'do nothing' option is likely to produce the least effect on this objective, as the option that is likely to attract the smallest population increase.
9	To minimise the risk of and from flooding	0	No obvious direct effects	+/-	Encouraging only 'desirable' forms of development may minimise the risk of flooding. However, an increase in development and population dependent on its location may increase the risk of and from flooding. Objective 2 will	+/-	An increase in population may increase the risk from flooding. Development in the city centre in apartments, however, may minimise the risk of and from flooding. Objective 2 will ensure that effects are mitigated.	Both options Y2 and Y3 may have positive and negative effects against this objective. However Objective 2 will ensure that effects are mitigated. Option Y1 is unlikely to affect the current situation.

					ensure that effects are mitigated.			
10	Increase energy efficiency	0	No obvious direct effects	+	The type of 'desirable' development is not specified, but could potentially include energy efficient design.	++	City Centre apartments may create the potential for increased energy efficiency through design.	The design of apartments in the city centre in option Y3 has the potential to generate energy efficient development.
11	Promote renewable energy production and use	0	No obvious direct effects	+	The type of 'desirable' development is not specified, but could potentially include the use of renewable energy and its production..	++	City Centre apartments may create the potential for increased viability and use of renewable energy sources such as PV panels and solar thermal..	Option Y3, may create the potential for the use of renewable energy technologies such as solar power.
12	Promote the reduction of waste generation and landfill, and increase levels of recycling to achieve more sustainable waste management	0	No obvious direct effects	+	The type or design of 'desirable' development is not specified. However, objective 1 to make the best use of resources may include the need to sustainable waste management facilities.	++	City Centre apartments may have increased viability for sustainable waste management through design.	The design of apartments in the city centre in option Y3 has the potential to generate more sustainable waste management.
13	Promote sustainable, high quality design in all development to contribute to a higher quality built and natural environment whilst adapting to the potential impacts of climate change	0	No obvious direct effects	+	The type or design of 'desirable' development is not specified. However, objective 1 to make the best use of resources and objective 2 to minimise contributions to climate change may increase contributions against this objective.	++	City Centre apartments may create the potential for more sustainable design. Objective 1 to make the best use of resources and objective 2 to minimise contributions to climate change may increase contributions against this objective.	Apartments in the city centre in option Y3 have the potential to generate more sustainable design.
SOCIAL								

14	Improve equality of opportunities amongst all social groups	0	No obvious direct effects	+	Encouraging more desirable forms of development may help to improve social equality and minimise the potential or perceived negative effects of a student population.	+/-	The development of city centre apartments, although providing opportunities for young people may be seen as favouritism toward a particular social group and therefore not contribute to social equality.	Option Y2 is seen as the most favourable of the options as it will minimise any potential negative effects from students on the surrounding population.
15	Improve the health and wellbeing of the population	0	No obvious direct effects	0	No obvious direct effects	0	No obvious direct effects	
16	Protect and provide improved local, social, recreational and leisure facilities for all sectors of the community, and improve access to them	0	No obvious direct effects	+	Encouraging more desirable forms of development may help to improve local services and facilities which could be used by the entire population.	++	Building accommodation to be attractive to young people is likely to generate the increased provision of services and facilities in the city centre, which could then be used by the entire community.	Option Y3 is predicted to provide the most benefits against this objective.
17	Improve the quantity, quality, variety and affordability of housing	0	No obvious direct effects	+/-	Encouraging more desirable forms of development may help to improve the quality of housing. However, the presence of students in an area may decrease the affordability of housing through increased competition for housing.	+/-	The building of apartments in the city centre may help to improve the quality of housing. However, the presence of students and young people in an area may increase the development of housing for young professionals, decreasing the affordability of	Both options Y2 and Y3 may have positive or negative effects in terms of their effects on the affordability of housing.

							housing.	
18	To contribute to a reduction in crime and social disorder and the fear of crime, promoting safer neighbourhoods	0	No obvious direct effects	++	Encouraging more desirable forms of development may help to improve security in student housing and reduce crime and fear of crime.	++	The development of new build apartments in the city centre presents an opportunity to design out crime.	Although the design of development is not specified in any of the options, a focus on improving housing for students and young people presents an opportunity to design out crime.
19	To conserve and enhance the historic environment of Newport	0	No obvious direct effects	++	Encouraging more desirable forms of development is likely to help to minimise the impact on the historic environment. Objective 5 will increase this effect.	+	It is unknown where the city centre apartments will be located or how they will be designed. However, objective 5 is likely to ensure that development has a beneficial effect on the historic environment.	Option Y2 at this stage is likely to create the most benefit in terms of impacts on the historic environment.
20	To identify, promote, strengthen and enhance the cultural identity of Newport	+	By not encouraging students to Newport, the identity of the local community may be more pronounced.	+/-	Encouraging more young people and students to the area may create a more diverse community, and may be viewed as a dilution of the Welsh identity of the City. However, the increase in the educated sector of the population may lead to an increase in cultural facilities and thus improve the cultural identity of the area.	+/-	Encouraging more young people and students to the area may create a more diverse community, and may be viewed as a dilution of the Welsh identity of the City. However, the increase in the educated sector of the population may lead to an increase in cultural facilities and thus improve the cultural identity of the area.	The identity of the local community may be further enhanced through the carrying forward of option 1.
ECONOMIC								
21	To enable high and stable levels of local	0	No obvious direct effects	++	Encouraging more desirable forms of development may	+++	Actively encouraging the retention of students and young	Option Y3 will generate the most benefits against this objective as it is likely

	employment in Newport				increase the attractiveness of the area and thus help to improve employment.		people in the city may make Newport more attractive to employers through an increase in the skilled workforce. This will likely increase local employment levels.	to lead to the retention of graduates as well as the attraction of students.
22	To support diverse and viable business growth and to achieve economic growth to contribute to business competitiveness, focusing on inward investment	0	No obvious direct effects	++	Encouraging more desirable forms of development may increase the attractiveness of the area and thus help to improve the economy. Additionally, the presence of students with a high disposable income is likely to generate local businesses.	+++	Actively encouraging the retention of students and young people in the city may make Newport more attractive and increase inward investment. Additionally, the presence of students with a high disposable income is likely to generate local businesses.	Option Y3 will generate the most benefits against this objective as it is likely to lead to the retention of graduates as well as the attraction of students.
23	To enhance the profile of Newport, and strengthen the tourist economy, sensitively capitalising on environmental, heritage, and leisure assets	0	No obvious direct effects	0	No obvious direct effects	0	No obvious direct effects	
24	To contribute to educational attainment and increase skill levels to promote/develop a knowledge based economy	0	No obvious direct effects	++	The presence of students in the area may increase through an improvement in housing and therefore lead to an increase in the knowledge-based economy.	+++	The direct encouragement and retention of graduates as well as students in the area may increase the knowledge-based economy and increase skills levels in the local population.	Option Y3 will generate the most benefits against this objective through the retention of graduates and potential for development of knowledge based industries based on retained skills.

25	Reducing the need to travel by improving local service provision	0	No obvious direct effects	++	The improvement in student accommodation may lead to an increase in local services and facilities in the local area as businesses are attracted to these areas due to high disposable incomes of students. Furthermore, the implementation of the objective to reduce the need to travel as well as objective 6 will increase this effect.	+++	The location of development in the city centre may help to reduce the need to travel. Furthermore, the implementation of the objective to reduce the need to travel as well as objective 6 will increase this effect.	Option Y3 will generate the most benefits against this objective through the location of development in the city centre.
26	Promote attractive and viable alternatives to car transport to achieve a modal shift to more sustainable modes of transport, including walking and cycling	0	No obvious direct effects	+	An increased presence of students may help to promote more sustainable modes of transport through a potential increase in population without private cars.	++	The location of development in the city centre may help to encourage walking and cycling as modes of transport.	Option Y3 will generate the most benefits against this objective through the location of development in the city centre.
27	To seek to improve the vitality and viability of the City Centre	0	No obvious direct effects	++	The location of development is unknown; however, the presence of students is likely to increase the vitality and viability of the city centre through a potential increase in catchment population.	+++	The location of apartments for students and young people in the city centre will likely have benefits for service businesses in the city centre, improving its vitality and viability.	Option Y3 will generate the most benefits against this objective.

C.4 Accommodation for the Elderly

Table C.4 – Accommodation for the Elderly

SA Objectives		OAP1 Do Nothing No special allowance for housing for the elderly.		OAP2 Limited Provision Some recognition given to the special requirements of housing developments for the elderly without allowing them on sites that would not otherwise be likely to be permitted.		OAP3 Specific Provision Specialist accommodation for the elderly (sometimes known as Continuing Care Retirement Communities (CCRCs)) involving a mix of uses including market housing, sheltered/supported accommodation, residential care home and nursing home, and community facilities such as communal lounge, restaurant, launderette, hairdresser, health centre and fitness suite, often open to the general public. Consideration could be given to allowing such development on sites that might not otherwise secure consent for open market housing, particularly where they would represent a valuable enhancement of local facilities.		Comparison of the Options
		Score	Comments	Score	Comments	Score	Comments	
Scale of Effect (SE): 0 – no effect; +++ strongly positive; ++ moderately positive; + slightly positive; ? effect unknown/unable to be predicted at this stage --- strongly negative; -- moderately negative; - slightly negative								
ENVIRONMENTAL								
1	Protect and enhance existing valued landscapes and open spaces and encourage their sustainable use, enjoyment and management	0	No obvious direct effects	+	Not allowing development on certain protected sites will help to protect valued landscapes.	--	The development of sites that would not normally be granted planning permission may include the development of greenfield sites that may harm the integrity of the landscape.	Option OAP3 is likely to have the most negative effects on landscape considerations.

2	To protect, manage and enhance biodiversity	0	No obvious direct effects	+	Not allowing development on certain protected sites will help to protect biodiversity.	-	The development of sites that would not normally be granted planning permission may include the development of greenfield sites that may harm biodiversity. However, this in unlikely to be contrary to the recommendations of the HRA, which will ensure valuable habitats and species are protected thereby minimising this effect.	Option OAP3 is likely to have the most negative effects on biodiversity.
3	To ensure efficient use of land and protect geodiversity, soil quality and mineral resources	0	No obvious direct effects	+	Not allowing development on certain protected sites will help to protect minerals and soil resources..	--	The development of sites that would not normally be granted planning permission may include the development of greenfield sites that may lead to the loss of valuable agricultural land.	Option OAP3 is likely to have the most negative effects on soils.
4	To improve air quality	0	No obvious direct effects	?	Not allowing development on certain protected sites may help to improve air quality, depending on their location and attributes..	+/-	The development of sites that would not normally be granted planning permission may include the development of greenfield sites that may lead to an increased need to travel. However, the development of CCRCs may reduce the need to travel and essential services and facilities will be provided on-site.	Option OAP3 could potentially generate both positive and negative effects, dependent on the nature and location of development.
5	To reduce emissions of greenhouse gases	0	No obvious direct effects	+	Maintaining development restrictions may help to minimise greenhouse gas emissions through the	+/-	The development of sites that would not normally be granted planning permission may include the development of greenfield sites that may lead to an increased need to travel;	Option OAP3 could potentially generate both positive and negative effects, dependent on the nature and location of development.

					retention of carbon sink capacity.		loss of carbon sink capacity; and a likely increase in building emissions. However, the development of CCRCs may reduce the need to travel and essential services and facilities will be provided on-site.	
6	To minimise noise pollution	0	No obvious direct effects	+	Maintaining development restrictions may help to minimise noise pollution.	-	If sites are developed in tranquil areas of countryside, the effects on construction especially are likely to cause noise pollution.	Option OAP3 is likely to generate the most noise pollution.
7	To maintain and, where possible, enhance, water quality	0	No obvious direct effects	+	Maintaining development restrictions may help to protect water quality as some of the restrictions are likely to be for water quality reasons.	-	If sites are developed in areas of countryside, water resources may be affected through an increase in surface water run off, which may result from an increase in hardstanding and lead to an increase in pollution to water resources. Objective 5 should minimise this effect.	Option OAP3 is likely to create the greatest possibility of pollution to water resources.
8	To reduce water consumption	0	No obvious direct effects	0	No obvious direct effects	0	No obvious direct effects	
9	To minimise the risk of and from flooding	0	No obvious direct effects	-	An increase in housing for elderly people may increase the risk from flooding as elderly people are particularly at risk. Mitigation measures are likely to be incorporated as a result of objective 2 in the LDP which will	--	An increase in housing for elderly people may increase the risk from flooding as elderly people are particularly at risk. . Mitigation measures are likely to be incorporated as a result of objective 2 in the LDP which will minimise this effect.	Both options OAP2 and 3 are likely to generate an increased risk from flooding.

					minimise this effect.			
10	Increase energy efficiency	0	No obvious direct effects	+	The design of development is not included as part of the option. However, objective 1 is likely to encourage the development of energy efficient design.	+	The design of development is not included as part of the option. However, objective 1 is likely to encourage the development of energy efficient design.	Options OAP2 and OAP3 are likely to generate energy efficient design through the implementation of the LDP objectives.
11	Promote renewable energy production and use	0	No obvious direct effects	0	No obvious direct effects	0	No obvious direct effects	
12	Promote the reduction of waste generation and landfill, and increase levels of recycling to achieve more sustainable waste management	0	No obvious direct effects	0	No obvious direct effects	0	No obvious direct effects	
13	Promote sustainable, high quality design in all development to contribute to a higher quality built and natural environment whilst adapting to the potential impacts of climate change	0	No obvious direct effects	+	Development is likely to be required to be built to sustainable standards through implementation of objectives 1 and 2.	+	Development is likely to be required to be built to sustainable standards through implementation of objectives 1 and 2.	Both OAP2 and OAP3 are likely to have similar effects on the historic environment through implementation of the LDP objectives.

SOCIAL								
14	Improve equality of opportunities amongst all social groups	0	No obvious direct effects	+	Recognising the need for special provision for elderly people may help to improve equality amongst different social groups.	++	Recognising the need for special provision for elderly people may help to improve equality amongst different social groups. The special provision of housing will ensure that this is delivered.	Option OAP3 is likely to generate the most significant benefits against this objective.
15	Improve the health and wellbeing of the population	0	No obvious direct effects	+	Recognising the need for special provision for elderly people may help to improve the health and wellbeing of this social group.	++	Recognising the need for special provision for elderly people may help to improve the health and wellbeing of this social group. The special provision of housing will ensure that this is delivered.	Option OAP3 is likely to generate the most significant benefits against this objective.
16	Protect and provide improved local, social, recreational and leisure facilities for all sectors of the community, and improve access to them	0	No obvious direct effects	+	Increased access to facilities may be enabled through objective 6.	+++	The development of CCRCs will help to improve facilities and services for elderly people in those communities, and possibly for the surrounding community as well. This may be increased through objective 7.	Option OAP3 is likely to generate the most significant benefits against this objective.
17	Improve the quantity, quality, variety and affordability of housing	0	No obvious direct effects	++	Recognising the need for special provision for elderly people may help to improve the quality of housing for this social group. Ensuring that housing meets the needs of the population is an objective of the LDP.	+++	The special provision of accommodation for elderly people will help to improve its quality and quantity. Ensuring that housing meets the needs of the population is an objective of the LDP.	Option OAP3 is likely to generate the most significant benefits against this objective.
18	To contribute to a reduction in crime and	0	No obvious direct effects	0	No obvious direct effects	+/-	The creation of communities for elderly people may reduce the	Option OAP3 has the potential to generate both

	social disorder and the fear of crime, promoting safer neighbourhoods						fear of crime through a lack of adolescents in these communities. However, the creation of such a community may also create a target for crime levels from outside the community.	positive and negative effects against this objective.
19	To conserve and enhance the historic environment of Newport	0	No obvious direct effects	+	New development should seek to enhance the built and natural environment, which will include the historic environment as part of objective 5 of the LDP.	+	New development should seek to enhance the built and natural environment, which will include the historic environment as part of objective 5 of the LDP.	Both OAP2 and OAP3 are likely to have similar effects on the historic environment through implementation of the LDP objectives.
20	To identify, promote, strengthen and enhance the cultural identity of Newport	0	No obvious direct effects	+	Recognising the need for special provision for elderly people may help the retention of this social group in the area, which may help to retain a sense of community and identity.	++	The special provision of housing for elderly people may help the retention of this social group in the area, which may help to retain a sense of community and identity.	Option OAP3 is likely to generate the most significant benefits against this objective.
ECONOMIC								
21	To enable high and stable levels of local employment in Newport	0	No obvious direct effects	0	No obvious direct effects	++	The development of CCRCs is likely to generate a significant number of local employment opportunities for the community.	Option OAP3 is likely to generate the most significant benefits against this objective.
22	To support diverse and viable business growth and to achieve economic growth to contribute to business competitiveness, focusing on inward	0	No obvious direct effects	+	The development of accommodation for the elderly may have positive effects for surrounding businesses.	++	The development of accommodation for the elderly may have positive effects for surrounding businesses, especially through the increase in facilities which may be used by the local	Option OAP3 is likely to generate the most significant benefits against this objective.

	investment						community.	
23	To enhance the profile of Newport, and strengthen the tourist economy, sensitively capitalising on environmental, heritage, and leisure assets	0	No obvious direct effects	0	No obvious direct effects	0	No obvious direct effects	
24	To contribute to educational attainment and increase skill levels to promote/develop a knowledge based economy	0	No obvious direct effects	0	No obvious direct effects	0	No obvious direct effects	
25	Reducing the need to travel by improving local service provision	0	No obvious direct effects	0	No obvious direct effects	++	The creation of local facilities within the CCRCs, will help to reduce the need to travel.	Option OAP3 is likely to generate the most significant benefits against this objective.
26	Promote attractive and viable alternatives to car transport to achieve a modal shift to more sustainable modes of transport, including walking and cycling	0	No obvious direct effects	0	No obvious direct effects	++	The creation of CCRCs may help to encourage walking and cycling as modes of transport, as facilities are likely to be within walking distance of accommodation.	Option OAP3 is likely to generate the most significant benefits against this objective.
27	To seek to improve the vitality and viability of the City Centre	0	No obvious direct effects	+	Increased provision of housing for the elderly may increase the local population and thus increase the catchment population for the city centre.	+/-	Increased provision of housing for the elderly may increase the local population and thus increase the catchment population for the city centre. However, the development of CCRCs may create out-of-town facilities that may attract	Option OAP2 is likely to have positive effects on the city centre, as it may generate an increase in catchment population for the facilities it offers.

							local people away from the city centre, decreasing its viability and vitality.	

C.5 Village Development

Table C.5 – Village Development

SA Objectives		V1 Do Nothing Village boundaries are currently drawn quite tightly, and in this option this would remain the case, with little scope for further development.		V2 Sustainable Village Development Allow limited development on the basis of strengthening the local community, with enhanced provision of affordable housing and higher Eco-homes standards of construction being required to offset car-dependency. Continuing Care Retirement Communities could be seen as appropriate in some villages (see OAP3)		V3 Village Expansion Allowing more development in villages generally than previously. Further development could increase the range and choice of new housing available, assisting in attracting inward investment in new employment. Any new development should be on the basis of providing the full 30% affordable housing. As inherently car dependent, Eco Homes Code Level 6 should also be required for all new housing development in villages.		Comparison of the Options
		Score	Comments	Score	Comments	Score	Comments	
Scale of Effect (SE): 0 – no effect; +++ strongly positive; ++ moderately positive; + slightly positive; ? effect unknown/unable to be predicted at this stage --- strongly negative; -- moderately negative; - slightly negative								
ENVIRONMENTAL								
1	Protect and enhance existing valued landscapes and open spaces and encourage their sustainable use, enjoyment and management	+++	Limiting the development in villages will ensure that there is no further development in areas of landscape value.	-	The extension to development in the villages will likely lead to the loss of open spaces and valued landscapes. Objective 1 of the LDP may enable the minimisation of this effect through making the most efficient use	--	The expansion of the villages will likely lead to the loss of open spaces and valued landscapes. Objective 1 of the LDP may enable the minimisation of this effect through making the most efficient use of land possible.	Limiting development in villages, as demonstrated in option V1, will have a positive effect against this objective.

					of land possible.			
2	To protect, manage and enhance biodiversity	++	Limiting the development in villages will minimise loss of biodiversity.	-	The extension to development in the villages may lead to the loss of some non-protected habitats. However, the HRA will ensure that effects on protected habitats and species are minimised.	--	Allowing more development in villages may lead to the loss of some non-protected habitats. The larger the development allowed, the more potential this effect has to be negative. However, the HRA will ensure that effects on protected habitats and species are minimised.	Limiting development in villages, as demonstrated in option V1, will have a positive effect against this objective.
3	To ensure efficient use of land and protect geodiversity, soil quality and mineral resources	++	Limiting development in villages will minimise loss of valuable soils resources and minerals.	-	An increase in development may put pressure on mineral resources, as well as lead to the loss of agricultural land through village extensions. Objective 1 will enable a minimisation of this effect.	--	An increase in development may put pressure on mineral resources, as well as lead to the loss of agricultural land through village extensions. Objective 1 will enable a minimisation of this effect.	Limiting development in villages, as demonstrated in option V1, will have a positive effect against this objective.
4	To improve air quality	-	Limiting development in the villages will help to minimise increases in traffic.	--	Allowing extensions to villages will likely increase traffic levels. Offsetting car-dependency using eco-homes standards for affordable housing is not seen as viable, as eco-homes standards require that services and facilities	---	Allowing the expansion of villages will likely increase traffic levels. The larger the increase in development, the greater the effect is likely to be. Offsetting car-dependency using eco-homes standards for	Option V1 will have the minimal effect on air quality when comparing the three options. It is recommended that any development of the villages is comprised of a mix of uses, to reduce the need to travel.

					are within walking distances[7] to services and facilities and do not apply to just buildings or 'offsetting' car-dependency. Reducing the need to travel as part of the LDP objectives will help to minimise the effect of new development.		affordable housing is not seen as viable, as eco-homes standards require that services and facilities are within walking distances[1] to services and facilities and do not apply to just buildings or 'offsetting' car-dependency. Reducing the need to travel as part of the LDP objectives will help to minimise the effect of new development.	
5	To reduce emissions of greenhouse gases	-	Limiting development in the villages will help to minimise increases in traffic, and emissions from buildings, as well as the loss of greenspace. However, any new development is likely to generate a net increase in greenhouse gas emissions, unless	--	Allowing extensions to villages will likely increase traffic levels, buildings and the loss of carbon sink capacity therefore will increase emissions of greenhouse gases. The use of Ecohomes standards to minimise these effects is commended. This will involve the provision of additional services	--	Allowing extensions to villages is likely to increase traffic levels, buildings and the loss of carbon sink capacity therefore will increase emissions of greenhouse gases. The use of EcoHomes standards to minimise these effects is commended. This will involve the provision	Option V1 is likely to have the least effect on greenhouse gas emissions.

7

Proximity to Local Amenities (BREEAM Ecohomes 2006 Rating Tra3: Local Amenities)

- Within 500m of a food shop and post box
- Within 1000m of 5 of the following: food shop, postal facility, bank/cash machine, pharmacy, primary school, medical centre, leisure centre, community centre, public house, children's play area, place of worship, outdoor open access public area
- Safe pedestrian routes to local amenities

			zero carbon techniques are employed.		and facilities including employment opportunities in order to be viable. Implementation of the objective to reduce the need to travel and to minimise contributions to climate change should also minimise effects.		of additional services and facilities including employment opportunities in order to be viable. Ecohomes code level 6 amounts to zero carbon development, which will not be achievable if the private car is the primary mode of transport as explained in the option. Implementation of the objective to reduce the need to travel and to minimise contributions to climate change should minimise these effects.	
6	To minimise noise pollution	-	Limiting development in the villages will minimise the effects on noise pollution. However, an increase in development is likely to increase noise pollution overall.	--	Extending development in the villages is likely to increase noise pollution, especially during construction phases.	--	Expanding the villages is likely to increase noise pollution, especially during construction phases and from traffic.	Option V1 is likely to have the lesser negative effect against this option.
7	To maintain and, where possible, enhance water quality	+	New development could pose a threat to water quality through an increase in surface water runoff. Objective 5 of the LDP may help to ensure that no negative	-	New development could pose a threat to water quality. Increasing development in villages will increase this risk. Objective 5 of the LDP may help to ensure that no	--	New development could pose a threat to water quality. Increasing development in villages will increase this risk. Objective 5 of the LDP may help to ensure that no	Option V1 may enable the maintenance of water quality through minimisation of the potential risks.

			consequences arise.		negative consequences arise.		negative consequences arise.	
8	To reduce water consumption	-	Minimising development will minimise the increase in water consumption. Objective 1 which seeks to make the best use of resources will minimise this effect.	-	An increase in development will lead to an increase in water consumption. Objective 1 which seeks to make the best use of resources will minimise this effect.	--	An increase in development will lead to an increase in water consumption. Objective 1 which seeks to make the best use of resources will minimise this effect.	Option V1 is likely to have the least negative effect against this option.
9	To minimise the risk of and from flooding	?	An increase in development will increase the risk of and from flooding, but this will be dependent on the location and type of development proposed. Minimising development in villages will minimise this risk. Additionally, potential risk will be mitigated through the implementation of objective 2 of the LDP.	?	An increase in development will lead to a loss of greenspace and an increase in hardstanding, which will increase the risk of flooding. The increase in population will increase the risk from flooding to people and property. The location of development in terms of the location of the flood plain will determine the magnitude of this risk, which therefore cannot be predicted at this stage. Additionally, potential risk will be mitigated through the implementation of objective 2 of the LDP. Ecohomes requirements will ensure minimised flood risk.	?	An increase in development will lead to a loss of greenspace and an increase in hardstanding, which will increase the risk of flooding. The increase in population will increase the risk from flooding to people and property. The location of development in terms of the location of the flood plain will determine the magnitude of this risk, which therefore cannot be predicted at this stage. Additionally, potential risk will be mitigated through the implementation of objective 2 of the LDP. Ecohomes requirements will ensure minimised flood risk.	Option V1 is likely to have the lesser negative effect against this option.

10	Increase energy efficiency	+	Energy efficiency standards may be required through the implementation of objective 1 of the LDP which seeks to make the best use of resources.	++	Requiring Ecohomes standards, although not considered to be appropriate for offsetting car-dependency, will require the increased energy efficiency or new development.	+++	Requiring Ecohomes standards, although not considered to be appropriate for offsetting car-dependency, will require the increased energy efficiency or new development.	Option V3 is likely to generate a greater positive effect against this objective, as code level 6 is required for all new housing development.
11	Promote renewable energy production and use	+	Renewable energy generation may be required through the implementation of objective 1 of the LDP which seeks to make the best use of resources.	++	Requiring Ecohomes standards, although not considered to be appropriate for offsetting car-dependency, will require the use of renewable energy sources in new development.	+++	Requiring Ecohomes standards, although not considered to be appropriate for offsetting car-dependency, will require the use of renewable energy sources in new development.	Option V3 is likely to generate a greater positive effect against this objective, as code level 6 is required for all new housing development.
12	Promote the reduction of waste generation and landfill, and increase levels of recycling to achieve more sustainable waste management	+	Sustainable waste management may be required through the implementation of objective 1 of the LDP which seeks to make the best use of resources.	++	Requiring Ecohomes standards, although not considered to be appropriate for offsetting car-dependency, will require more sustainable waste management in new development.	+++	Requiring Ecohomes standards, although not considered to be appropriate for offsetting car-dependency, will require more sustainable waste management in new development.	Option V3 is likely to generate a greater positive effect against this objective, as code level 6 is required for all new housing development.
13	Promote sustainable, high quality design in all development to contribute to a higher quality built and natural environment whilst adapting to the potential impacts of climate change	+	Sustainable design standards may be required through the implementation of objective 1 of the LDP which seeks to make the best use of resources.	++	Requiring Ecohomes standards, although not considered to be appropriate for offsetting car-dependency, will enable sustainable and high quality design.	+++	Requiring Ecohomes standards, although not considered to be appropriate for offsetting car-dependency, will enable sustainable and high quality design.	Option V3 is likely to generate a greater positive effect against this objective, as code level 6 is required for all new housing development.
SOCIAL								

14	Improve equality of opportunities amongst all social groups	+	Limited development in the villages should meet the needs of the local population in accordance with objective 4 of the LDP.	+/-	Allowing limited development on the basis of strengthening the local community, with enhanced provision of affordable housing, will help to further this objective. Objective 4 of the LDP seeks to meet the needs of the local population and will enhance this. However, the lack of facilities and employment opportunities may mean that people without access to a car do not have equitable opportunities. New housing development should be sought in accordance with objective 6 of the LDP.	--	Further development in villages can lead to the pricing out of local people from the housing market in those areas. The requirement for affordable housing, however, may enable some alleviation of this effect, enabling the development of more balanced communities. An increase in housing without concurrent development of employment opportunities may mean that people without access to a car do not have equitable opportunities, which may further increase social inequalities.	If Ecohomes criteria are employed for development, this will mean that housing is constructed within walking distance of local facilities and employment opportunities, or good public transport. This will help to increase social equality. Option V3 requires a high specified level of affordable housing and Ecohomes criteria. Although this option has the potential to have the most negative effects socially, these criteria may help to minimise this. It is proposed that these criteria be applied to option V2, to create the most sustainable approach to village development.
15	Improve the health and wellbeing of the population	+	Limiting development in villages may help to improve the health and wellbeing of the current populations in the villages as it will retain their current accessibility to open space for informal recreation.	++	If development is only permitted based on supporting the viability of local facilities, health levels may be improved through improved sports facilities and health services. Limited development will not likely restrict access to greenspace to a large degree, although this will depend on the nature	+/-	The expansion of villages may lead to an increase restriction on access to greenspace for residents as well as increase pollution levels, and place increased pressure on local health and leisure facilities. However, if Ecohomes standards are adhered to increased	It is considered that option V2 will have the most positive effect against this sustainability objective.

					of development.		development may lead to an increase in the provision of these facilities in the villages, which could have positive effects.	
16	Protect and provide improved local, social, recreational and leisure facilities for all sectors of the community, and improve access to them	+/-	Limiting further development in the villages could potentially limit the viability of local services and facilities, which will not lead to an improvement. Conversely, limiting the population growth in these areas will limit pressure on existing facilities to enable a better service for the present population.	+++	If development is only permitted based on supporting the viability of local facilities, this will inevitably lead to their improvement. Objective 6 of the LDP will help to further this effect.	+/-	The expansion of villages may place increased pressure on local services and facilities. However, if Ecohomes standards are adhered to increased development may lead to an increase in the provision of these facilities in the villages, which could have positive effects.	It is considered that option V2 will have the most positive effect against this sustainability objective.
17	Improve the quantity, quality, variety and affordability of housing	0	No obvious direct effects.	++	The option seeks to allow limited development on the basis of strengthening the local community, with enhanced provision of affordable housing. Without a specified percentage of affordable housing to be supplied, the potential magnitude of the effect is unable to be predicted.	+/-	As quoted, further development in villages can lead to the pricing out of local people from the housing market in those areas. The requirement for 30% affordable housing, however, may enable some alleviation of this effect.	It is considered that option V2 will have the most positive effect against this sustainability objective.
18	To contribute to a reduction in crime and social disorder and the fear of crime,	0	No obvious direct effects.	++	The option seeks to allow limited development on the basis of strengthening the local community,	+/-	Further development in villages can lead to the pricing out of local people from the housing market in	It is considered that option V2 will have the most positive effect against this sustainability objective.

	promoting safer neighbourhoods				and improving the viability of local services and facilities. This may enable the reduction of crime levels.		those areas, which may lead to the development of unbalanced communities which could increase crime levels. The requirement for 30% affordable housing, however, may enable some alleviation of this effect.	
19	To conserve and enhance the historic environment of Newport	++	Limiting development in the villages will help to conserve and enhance their character and may lead to the rejuvenation of existing buildings.	++	Limited development to enhance the vitality and viability of the villages may enable the enhancement of the historic environment.	+/-	Allowing the expansion of local villages may lead to development which is inappropriate in scale and type to the local village character. However, objective 5 of the LDP, which seeks to enhance the quality of the built environment, may counterbalance this effect.	It is considered that options V1 and V2 will have the most positive effects against this sustainability objective.
20	To identify, promote, strengthen and enhance the cultural identity of Newport	++	Limiting development in the villages may lead to the retention of the existing community and thus their sense of identity.	++	Limiting development to enhance the vitality and viability of the villages may help to maintain a sense of identity in these areas through the increase in their self sufficiency as communities.	--	Allowing the expansion of local villages may lead to a substantial increase in housing, which might include wealthy commuters who may not contribute to village life.	It is considered that options V1 and V2 will have the most positive effects against this sustainability objective.

ECONOMIC								
21	To enable high and stable levels of local employment in Newport	0	No obvious direct effects.	++	Providing affordable housing for local families, on the basis of sustaining local facilities, services and businesses, is likely to enable employment in the villages.	+/-	An increase in housing through the expansion of the villages is likely to create unbalanced development in terms of matching the provision of employment opportunities with residential opportunities. Ecohomes requirements may help to counter-balance this effect.	It is considered that option V2 will have the most positive effect against this sustainability objective.
22	To support diverse and viable business growth and to achieve economic growth to contribute to business competitiveness, focusing on inward investment	0	No obvious direct effects.	++	Providing affordable housing for local families, on the basis of sustaining local facilities, services and businesses, is likely to support business growth.	?	An increase in inward investment to the villages may lead to the growth of the economy in villages, although this is not yet known based on current information.	It is considered that option V2 will have the most positive effect against this sustainability objective.
23	To enhance the profile of Newport, and strengthen the tourist economy, sensitively capitalising on environmental, heritage, and leisure assets	++	The restriction of development in the villages could enhance their potential as heritage assets for tourism.	+	The enhancement of facilities in the villages could enhance their potential as assets for tourism.	0	No obvious direct effects.	It is considered that option V1 will have the most positive effect against this sustainability objective.
24	To contribute to educational attainment and increase skill levels to	0	No obvious direct effects.	++	Limiting development to enhance local services may improve the viability of local	+/-	Expansion of the villages may improve the viability or provision of local	It is considered that option V2 will have the most positive effect against this sustainability objective.

	promote/develop a knowledge based economy				educational facilities.		educational facilities. However, the expansion of the villages may also create pressure on existing facilities.	
25	Reducing the need to travel by improving local service provision	0	No obvious direct effects.	++	Limiting development to enhance local services may reduce the need to travel.	+/-	Expanding development of housing in villages is likely to increase traffic levels considerably and place increased pressure on local services. Ecohomes standards will require that services are within walking distance of residential areas, and so are likely to improve the sustainability of development in these areas if implemented successfully.	It is considered that option V2 will have the most positive effect against this sustainability objective.
26	Promote attractive and viable alternatives to car transport to achieve a modal shift to more sustainable modes of transport, including walking and cycling	0	No obvious direct effects.	+/-	Limiting development to enhance local services may reduce the need to travel. It is not considered appropriate, however, that Ecohomes standards will 'offset' car dependency. Sustainable modes of transport and reducing the need to travel are requirements of the Ecohomes standards,	--	Expanding development of housing in villages is likely to increase traffic levels considerably. It is not considered appropriate, however, that Ecohomes standards will 'offset' car dependency. Sustainable modes of transport and reducing the need to travel are	Option V2 is likely to generate the most benefits in terms of achieving a shift to more sustainable modes of transport.

					and require a more integrated approach to potential increases in traffic be taken to prioritise more sustainable modes.		requirements of the Ecohomes standards, and require a more integrated approach to potential increases in traffic be taken to prioritise more sustainable modes.	
27	To seek to improve the vitality and viability of the City Centre	0	No obvious direct effects.	+/-	An improvement in facilities in the villages may reduce the vitality of the city centre, through reducing its catchment population. Conversely, development in the villages may increase the local population and increase the catchment population.	++	Development in the villages may increase the local population and increase the catchment population as the increased population are likely to require the city centre for the provision of services and facilities.	Option V3 is likely to generate the most significant positive effects against this objective.

C.6 Employment

Table C.6 - Employment

SA Objectives		E1 Do Nothing Newport has a considerable amount of land allocated for employment purposes, so an option would be to carry this forward without significant alteration.		E2 Market-led Reappraisal of Supply This option would allow for additions or deletions to be made to employment allocations largely on the basis of removing sites that have not been developed and may be unlikely to be developed, and adding others in developer favoured locations.		E3 Sustainable and Regeneration Based Employment This option would seek to maximise employment in sustainable locations, well-related to public transport, including city centre and other brownfield locations.		E4 Employment Promotion on Non-Employment Sites This would seek to maximise employment opportunities through the encouragement of employment generating uses. Renewed regional hospital facilities would be particularly favoured in view of the range, quality and quantity of jobs.		Comparison of the Options
		Score	Comments	Score	Comments	Score	Comments	Score	Comments	
Scale of Effect (SE): 0 – no effect; +++ strongly positive; ++ moderately positive; + slightly positive; ? effect unknown/unable to be predicted at this stage --- strongly negative; -- moderately negative; - slightly negative										
ENVIRONMENTAL										
1	Protect and enhance existing valued landscapes and open spaces and encourage their sustainable use, enjoyment and management	?	It is unknown whether or not the existing allocations are on greenfield or brownfield land. Existing allocations should be subject to SA before being carried forward.	-	It is unknown whether or not the existing allocations are on greenfield or brownfield land. Sites developed as a result of market demand are likely to be greenfield as these will require less capital expenditure and thus may lead to a loss of countryside. Objective 1 of the LDP will minimise this effect through ensuring the efficient use of	+++	The prioritisation of development in brownfield locations will help to protect valuable landscapes and countryside.	-	The creation of employment through the promotion of services and facilities may have an impact on the landscape, depending on whether or not these sites are on brownfield or greenfield land. It is suggested that hospital facilities are likely to be on greenfield land due to their scale, and so will lead to negative effects	Option E3 is predicted to have the most beneficial effects against this sustainability objective.

					land.				against this objective.	
2	To protect, manage and enhance biodiversity	?	It is unknown whether or not the existing allocations are on greenfield or brownfield land. Existing allocations should be subject to SA before being carried forward.	-	It is unknown whether or not the existing allocations are on greenfield or brownfield land. Sites developed as a result of market demand are likely to be greenfield as these will require less capital expenditure and thus may lead to a loss of biodiversity. However, the HRA will seek that no protected sites for biodiversity are affected from the impacts of new development which will minimise this effect.	+/-	The prioritisation of development in brownfield locations may help to protect and enhance biodiversity. However, some brownfield sites may have been colonised by important species, and thus development of these sites may lead to the loss of these new habitats.	+/-	The creation of employment through the promotion of services and facilities may have an impact on biodiversity, whether or not these sites are on brownfield or greenfield land. Due to the large scale of hospital facility development, it is likely that this will lead to negative effects. However, the HRA will seek that no protected sites for biodiversity are affected from the impacts of new development which will minimise this effect.	Options E3 and E4 are predicted to have the most beneficial effects against this sustainability objective.
3	To ensure efficient use of land and protect geodiversity, soil quality and mineral resources	-	It is unknown whether or not the existing allocations are on greenfield or brownfield land, although an increase in development is likely to place increased pressure on	-	It is unknown whether or not the existing allocations are on greenfield or brownfield land, although an increase in development is likely to place increased pressure on mineral resources. Sites	+++	The prioritisation of development in brownfield locations will help to protect valuable agricultural land. Development in brownfield locations may lead to the re-use of existing buildings, which may reduce an increased pressure	+++	The creation of employment opportunities through the promotion of services and facilities is seen to be an efficient use of land and buildings.	Options E3 and E4 are predicted to have the most beneficial effects against this sustainability objective.

			mineral resources. Existing allocations should be subject to SA before being carried forward.		developed as a result of market demand are likely to be greenfield as these will require less capital expenditure, which may lead to the loss of agricultural land. LDP objective 1 will minimise this effect through ensuring the efficient use of land.		on mineral resources.			
4	To improve air quality	-	An increase in development is likely to lead to an increase in car-based traffic, decreasing air quality. However, the locations of development are not yet known, and should be subject to SA prior to being carried forward. This will help to enable the LDP objective which seeks to reduce the need to travel, which will improve air quality.	---	Market forces are likely to develop locations that are close to the motorway, which is likely to lead to an increase in car-based traffic and subsequent decrease in air quality.	-	Maximising employment in sustainable locations, well-related to public transport, will help to minimise increases in traffic and contributions to air pollution, although an increase in development will likely have overall negative effects on this objective.	-	Hospital facilities are likely to be in locations tat are less accessible by public transport and thus are likely to decrease air quality as a result of increased traffic emissions. However, implementation of the objective to achieve a shift to more sustainable modes of transport may minimise this effect.	Options E1, E3 and E4 are predicted to have the least negative effects against this sustainability objective.
5	To reduce emissions of greenhouse	-	An increase in development is likely to lead to	--	Market forces are likely to develop locations that are	+	Maximising employment in sustainable locations, well-	-	An increase in development is likely to lead to an	Option E3 is predicted to reduce the emissions of

	gases		an increase in overall greenhouse gas emissions from buildings and car-based traffic. This effect is likely to be minimised from the implementation of the LDP policies, notably those that arise from objectives 1 and, to make the best use of resources and minimise contributions to climate change.		close to the motorway, which is likely to lead to an increase in car-based traffic and greenhouse gas emissions. An increase in emissions will also arise from built development and the loss of carbon sink capacity that may arise through the development of greenfield land. This effect may be minimised through the implementation of LDP objectives 1 and 2 as well as the additional objective to reduce the need to travel.		related to public transport, will help to minimise increases in traffic and greenhouse gases, although an increase in development will likely have overall negative effects on this objective. Increased development will also lead to increased emissions from buildings; however, this is likely to be reduced through implementation of LDP objectives 1 and 2.		increase in greenhouse gas emissions from buildings and car-based traffic. However, this will be reduced through combining employment uses with local facility and service provision, which may lead to an efficient use of resources. Reducing the need to travel through locating facilities close to residential areas (LDP objective) may minimise increases in traffic levels.	greenhouse gases through reducing the need to travel.
6	To minimise noise pollution	-	The potential impact from noise will be dependent on the nature on employment developed. However, an increase in traffic is likely to increase noise pollution in the area.	-	The potential impact from noise will be dependent on the nature on employment developed. However, an increase in traffic is likely to increase noise pollution in the area.	++	Development in sustainable locations is likely to minimise noise pollution through a minimisation of traffic increases and development in urban locations.	-	An increase in traffic is likely to increase noise pollution in the area.	Option E3 is predicted to have the most beneficial effects against this sustainability objective.
7	To maintain and, where possible,	+	Potentially polluting effects from an increase	+	Potentially polluting effects from an increase in surface	++	The option may lead to the remediation of contaminated sites,	+	Potentially polluting effects from an increase in surface	Option E3 is predicted to have the most beneficial effects

	enhance water quality		in surface water run off are likely to be avoided through the implementation of the LDP objectives.		water run off are likely to be avoided through the implementation of the LDP objectives.		and thus improve water quality through an improvement in soils.		water run off are likely to be avoided through the implementation of the LDP objectives.	against this sustainability objective as it is likely to make a proactive contribution to water quality through land remediation.
8	To reduce water consumption	-	An increase in development may lead to an increase in water consumption, however this effect will be minimised through LDP objective 1 which seeks to make the best use of resources.	-	An increase in development may lead to an increase in water consumption, however this effect will be minimised through LDP objective 1 which seeks to make the best use of resources.	-	An increase in development may lead to an increase in water consumption, however this effect will be minimised through LDP objective 1 which seeks to make the best use of resources.	-	An increase in development may lead to an increase in water consumption, however this effect will be minimised through LDP objective 1 which seeks to make the best use of resources.	All of the options, providing that they increase employment to similar levels, are likely to have similar effects on water consumption.
9	To minimise the risk of and from flooding	-	An increase in development may increase surface water run-off, which could increase the risk of and from flooding. Flood risk as a result of climate change is likely to be mitigated as a result of LDP objectives, minimising overall risk.	-	An increase in development may increase surface water run-off, which could increase the risk of and from flooding. Flood risk as a result of climate change is likely to be mitigated as a result of LDP objectives, minimising overall risk.	+	From the development of brownfield land, the net increase in surface water run off may be lower than the development of greenfield land through the reuse of already impermeable surfaces. Flood risk as a result of climate change is likely to be mitigated as a result of LDP objectives,	?	An increase in development may increase surface water run-off, which could increase the risk of and from flooding. Flood risk as a result of climate change is likely to be mitigated as a result of LDP objectives, minimising overall risk. The provision of employment opportunities through the provision of local	Option E3 is predicted to have the least negative effects against this sustainability objective as it is likely to result in the least amount of built development of greenfield land.

							minimising overall risk.		facilities may enable reduced built development, reducing this effect. However, it is unknown what type of land will be developed or at what scale.	
10	Increase energy efficiency	+	Implementation of LDP objectives is likely to encourage increased energy efficiency in new development.	+	Implementation of LDP objectives is likely to encourage increased energy efficiency in new development.	++	Development in city centre locations is likely to improve energy efficiency, especially through sustainable transport and its viability.	++	The provision of employment opportunities through the provision of local facilities may enable reduced built development, improving efficiency.	Options E3 and E4 are predicted to have the most beneficial effects against this sustainability objective.
11	Promote renewable energy production and use	?	It is unknown whether employment allocations will be required as part of new development as a result of the LDP objectives at this stage, although this could be required as making the best use of resources as well as minimising the causes of climate change.	?	It is unknown whether employment allocations will be required as part of new development as a result of the LDP objectives at this stage, although this could be required as making the best use of resources as well as minimising the causes of climate change.	?	It is unknown whether employment allocations will be required as part of new development as a result of the LDP objectives at this stage, although this could be required as making the best use of resources as well as minimising the causes of climate change.	?	It is unknown whether employment allocations will be required as part of new development as a result of the LDP objectives at this stage, although this could be required as making the best use of resources as well as minimising the causes of climate change. Facilities such as hospitals present good opportunities for the production of low carbon energy generation, such as	Effects are unable to be predicted at this stage.

									CHP.	
12	Promote the reduction of waste generation and landfill, and increase levels of recycling to achieve more sustainable waste management	-	An increase in development is likely to lead to an increase in waste generation. This effect is likely to be minimised through the need to make the best use of resources under objective 1 of the LDP.	-	An increase in development is likely to lead to an increase in waste generation. This effect is likely to be minimised through the need to make the best use of resources under objective 1 of the LDP.	+	The location of development in the city centre may enable shared and local facilities for sustainable waste management thus reducing the level of waste sent to landfill.	+	The promotion of employment through improved facilities and services may enable shared and local facilities for sustainable waste management thus reducing the level of waste sent to landfill.	Options E3 and E4 are predicted to have potential to improve the potential for sustainable waste management viability.
13	Promote sustainable, high quality design in all development to contribute to a higher quality built and natural environment whilst adapting to the potential impacts of climate change	+	Implementation of LDP objectives to make the best use of resources as well as minimise and mitigate climate change impacts are likely to lead to requirements for the sustainable design of development.	+	Implementation of LDP objectives to make the best use of resources as well as minimise and mitigate climate change impacts are likely to lead to requirements for the sustainable design of development.	++	Implementation of LDP objectives to make the best use of resources as well as minimise and mitigate climate change impacts are likely to lead to requirements for the sustainable design of development. The location of development on brownfield land is likely to improve the potential benefits of this option.	+	Implementation of LDP objectives to make the best use of resources as well as minimise and mitigate climate change impacts are likely to lead to requirements for the sustainable design of development.	Option E3 is likely to increase the potential for more sustainable design than the other objectives, as the development of brownfield land in sustainable locations is considered inherently sustainable.
SOCIAL										
14	Improve equality of opportunities	?	It is unclear where the existing	?	It is unclear where the allocations are in relation to	+++	Development of employment opportunities in accessible	++	Development of employment opportunities as part of promoting	Option E3 is predicted to have the most beneficial effects

	amongst all social groups		allocations are in relation to different social groups or public transport access. All sites should be subject to SA before being carried forward.		different social groups. A re-appraisal of sites may lead to the creation of more favourable locations against this objective.		locations by public transport may improve the equality of opportunities.		services and facilities will improve the equality of opportunities from the increase in employment as well as their amenity value.	against this sustainability objective.
15	Improve the health and wellbeing of the population	0	No obvious direct effects.	0	No obvious direct effects.	0	No obvious direct effects.	++	Renewed regional hospital facilities may improve the health and wellbeing of the population.	Option E4 is predicted to have the most beneficial effects against this sustainability objective.
16	Protect and provide improved local, social, recreational and leisure facilities for all sectors of the community, and improve access to them	?	LDP objective 6 requires the provision of community facilities wherever possible, although it is unknown whether these will be required as part of employment development at this stage.	?	LDP objective 6 requires the provision of community facilities wherever possible, although it is unknown whether these will be required as part of employment development at this stage.	?	LDP objective 6 requires the provision of community facilities wherever possible, although it is unknown whether these will be required as part of employment development at this stage.	++	Employment promotion on non-employment sites may lead to the promotion of improved local, social, recreations and leisure facilities.	Option E4 is predicted to have the most beneficial effects against this sustainability objective.
17	Improve the quantity, quality, variety and affordability of housing	0	No obvious direct effects.	0	No obvious direct effects.	0	No obvious direct effects.	0	No obvious direct effects.	
18	To contribute to a reduction	+	An increase in employment may	+	An increase in employment may	++	An increase in employment may	+	An increase in employment may	Option E3 is predicted to have the most

	in crime and social disorder and the fear of crime, promoting safer neighbourhoods		help to reduce crime levels and a fear of crime through a reduction in the number of unemployed.		help to reduce crime levels and a fear of crime through a reduction in the number of unemployed.		help to reduce crime levels and a fear of crime. This may be more prevalent in the city centre, as a concentration of people will help to increase natural surveillance alongside reducing the number of unemployed.		help to reduce crime levels and a fear of crime through a reduction in the number of unemployed.	beneficial effects against this sustainability objective.
19	To conserve and enhance the historic environment of Newport	+	LDP objective 5 will ensure that the quality of the historic environment is not adversely affected by new development.	+	LDP objective 5 will ensure that the quality of the historic environment is not adversely affected by new development.	+	Development in the city centre could enhance the historic environment, depending on its nature. LDP objective 5 will ensure that the quality of the historic environment is not adversely affected by new development.	+	LDP objective 5 will ensure that the quality of the historic environment is not adversely affected by new development.	All of the options are likely to have similar effects on the historic environment through the implementation of the LDP objectives.
20	To identify, promote, strengthen and enhance the cultural identity of Newport	?	New employment opportunities may enhance the cultural identity of Newport, depending on their nature. For example, the mining industry has historically shaped the culture of the South Wales	?	New employment opportunities may enhance the cultural identity of Newport, depending on their nature. For example, the mining industry has historically shaped the culture of the South Wales valleys, and	?	New employment opportunities may enhance the cultural identity of Newport, depending on their nature. For example, the mining industry has historically shaped the culture of the South Wales valleys, and	?	New employment opportunities may enhance the cultural identity of Newport, depending on their nature. For example, the mining industry has historically shaped the culture of the South Wales valleys, and	Effects are unable to be predicted at this stage.

			valleys, and knowledge based industries could characterise the future of Newport's culture, if delivered.		knowledge based industries could characterise the future of Newport's culture, if delivered.		knowledge based industries could characterise the future of Newport's culture, if delivered.		knowledge based industries could characterise the future of Newport's culture, if delivered.	
ECONOMIC										
21	To enable high and stable levels of local employment in Newport	+	Carrying forward current allocations could potentially lead to the creation of local employment, although whether or not these sites are in appropriate locations to enable their delivery is not clear.	++	Adopting a market-led solution to the provision of employment land will likely lead to the delivery of more sites and the creation of employment opportunities.	+++	The creation of sites in the city centre for development is likely to increase local employment through the creation of employment in accessible locations.	++	The promotion of employment through services and facilities is likely to generate deliverable job opportunities in the plan area, although this option alone may not deliver opportunities for the entire community.	Options E3 and E4 are all likely to have the most beneficial effects against this objective through the provision of what are considered to be the most deliverable sites for sustainable development.
22	To support diverse and viable business growth and to achieve economic growth to contribute to business competitiveness, focusing on inward investment	+	Carrying forward current allocations could potentially lead to inward investment, although whether or not these sites are in appropriate locations to enable their delivery is not clear.	++	Adopting a market-led solution to the provision of employment land will likely lead to the delivery of more sites and increase in inward investment and economic growth.	+++	The creation of sites in the city centre for development is likely to improve the local economy through an increase in inward investment as well as subsidiary benefits for surrounding businesses.	+++	The promotion of employment through services and facilities is likely to generate a significant number of deliverable job opportunities as well as subsidiary benefits for surrounding businesses.	Options E3 and E4 are likely to have the most beneficial effects against this objective through being located in the most sustainable sites, which are likely to have beneficial effects on the surrounding businesses.

23	To enhance the profile of Newport, and strengthen the tourist economy, sensitively capitalising on environmental, heritage, and leisure assets	?	Employment sites may generate a growth in the tourism industry, depending on their nature and location.	?	Employment sites may generate a growth in the tourism industry, depending on their nature and location.	?	Employment sites may generate a growth in the tourism industry, depending on their nature and location.	?	The promotion of employment through services and facilities may generate a number of job opportunities within the tourism sector.	Effects are unable to be predicted at this stage.
24	To contribute to educational attainment and increase skill levels to promote/develop a knowledge based economy	+	The development of employment sites is likely to increase educational attainment through an increase in on-the-job training.	+	The development of employment sites is likely to increase educational attainment through an increase in on-the-job training.	+	The development of employment sites is likely to increase educational attainment through an increase in on-the-job training.	+++	The promotion of employment on land not specifically allocated for employment purposes will include schools and other educational facilities. The promotion of such sites may improve their quality and quantity which may improve skills levels. Employment opportunities are likely to increase educational attainment through an increase in on-the-job training.	Option E4 is likely to have a beneficial effect against this objective.
25	Reducing the need to travel by improving local service provision	+	The creation of employment may lead to the creation of improved local services in the surrounding areas through increased	+	The creation of employment may lead to the creation of improved local services in the surrounding areas through increased footfall.	++	The creation of employment in the city centre may lead to the creation of improved local services in the surrounding areas through increased	+	The promotion of employment on land not specifically allocated for employment purposes may lead to an improvement in local service provision locally.	Option E3 is likely to have a beneficial effect against this objective.

			footfall.				footfall.			
26	Promote attractive and viable alternatives to car transport to achieve a modal shift to more sustainable modes of transport, including walking and cycling	?	It is unclear where the existing allocations are located in relation to sustainable transport options or residential areas.	-	It is unclear where the existing allocations are located in relation to sustainable transport options or residential areas. However, it is likely that market conditions will lead to the allocation of sites close to the motorway, which is likely to lead to negative effects against this objective. Reducing the need to travel through implementation of LDP objectives is likely to minimise this effect.	++	The creation of employment in the city centre is likely to lead to enable a modal shift towards more sustainable modes of transport.	?	It is unclear where the existing allocations are located in relation to sustainable transport options or residential areas.	Option E3 is likely to have a beneficial effect against this objective.
27	To seek to improve the vitality and viability of the City Centre	?	It is unclear where the existing allocations are located in relation to the city centre. However, an increase in employment opportunities may increase the population of Newport, thus increasing the catchment of the	--	It is unclear where the existing allocations are located in relation to the city centre. However, it is likely that market conditions will lead to the allocation of sites close to the motorway, which may lead to negative effects against this objective through an increase in	+++	The creation of employment in the city centre is likely to lead to an increase in footfall and inward investment, improving its vitality and viability.	?	It is unclear where allocations will be located in relation to the city centre. An increase in employment opportunities may increase the local population and increase the catchment of the city centre.	Option E3 is likely to have a beneficial effect against this objective.

			city centre.		commuters to Newport who do not use the city centre for its facilities and services.					

C.7 Celtic Manor

Table C.7 – Celtic Manor

SA Objectives		CM1 Do Nothing Under this option any further development proposals would be considered on an individual case by case basis.		CM2 Masterplan Approach The Celtic Manor site as a whole could be allocated for leisure use, with a masterplan to be prepared as Supplementary Planning Guidance to provide a framework for acceptable development.		Comparison of the Options
		Score	Comments	Score	Comments	
Scale of Effect (SE): 0 – no effect; +++ strongly positive; ++ moderately positive; + slightly positive; ? effect unknown/unable to be predicted at this stage --- strongly negative; -- moderately negative; - slightly negative						
ENVIRONMENTAL						
1	Protect and enhance existing valued landscapes and open spaces and encourage their sustainable use, enjoyment and management	-	An ad hoc approach may lead to the loss of important landscapes and countryside, although this effect will be minimised through development control policies.	+++	The development of a masterplan for the development of the site will enable important landscapes to be protected from inappropriate development.	Option CM2 is considered to be the most sustainable objective from the perspective of landscape protection and enhancement.
2	To protect, manage and enhance biodiversity	-	An ad hoc approach may lead to the loss of important habitats and species, although this effect will be minimised through development control policies as well as the implications of the HRA.	+++	The development of a masterplan for the development of the site will enable important habitats and species to be protected from inappropriate development and integrate the findings of the HRA.	Option CM2 is considered to be the most sustainable objective from the perspective of biodiversity.
3	To ensure efficient use of land and protect geodiversity, soil quality	-	An ad hoc approach may lead to the loss of important agricultural land and soils, although this effect	+++	The development of a masterplan for the development of the site will enable important agricultural land and soils to be protected from	Option CM2 is considered to be the most sustainable objective from the perspective of soil quality and

	and mineral resources		will be minimised through the implementation of the LDP.		inappropriate development and mitigate potential effects.	geodiversity.
4	To improve air quality	--	Determining developments on a case by case basis may lead to an unforeseen growth in traffic levels, leading to negative effects on air quality.	+	The development of a masterplan could ensure that a strategic approach to traffic growth is taken, and lead to the creation of a strategic travel plan with sustainable modes prioritised. This will help to reduce the increase in air pollution and may improve local air quality.	Option CM2 is considered the option that will be able to minimise contributions to air quality.
5	To reduce emissions of greenhouse gases	--	Determining developments case by case may lead to negative cumulative effects on greenhouse gas emissions, including from buildings, traffic and loss of carbon sink capacity.	-	Increased development is likely to increase greenhouse gas emissions. However, a masterplan for the site will ensure that cumulative effects from the emissions of greenhouse gases are minimised, and that mitigation can be implemented at the strategic level.	Option CM2 is predicted to have a lesser effect on greenhouse gas contributions.
6	To minimise noise pollution	-	Noise pollution will be mostly determined by the type of development permitted on site. A case by case approach may mean that the cumulative effect of non-compatible uses and traffic leads to increased noise pollution.	++	A masterplan for the site could ensure that traffic levels, the effects from construction, and cumulative effects from built development are minimised.	Option CM2 has potential to result in minimal effects on noise pollution.
7	To maintain and, where possible, enhance water quality	-	The determination of planning applications on a case by case basis may lead to the deterioration of water quality through the cumulative effects on built development including an increase in surface water run off which could contain pollutants, or an increase in chemicals and fertilisers used on land. This effect will be minimised through the implementation of LDP policies.	++	A strategic approach will enable water quality to be considered on a site-wide basis, ensuring the maintenance and potential improvement of water quality.	Option CM2 is likely to generate the most beneficial effects against this objective.

8	To reduce water consumption	-	An increase in development may lead to an increase in water consumption. This effect will be minimised through the implementation of LDP policies.	++	The development of a masterplan could include measures to reduce water consumption strategically, such as rainwater harvesting and management.	Option CM2 is likely to generate the most beneficial effects against this objective.
9	To minimise the risk of and from flooding	+	An increase in development may lead to an increase in flood risk through a potential loss of vegetation and increase in surface water run off. However, this effect is likely to be mitigated and minimised through the implementation of the LDP, particularly relating to objective 2 which seeks to minimise the effects of climate change.	+++	The development of a masterplan could take a strategic approach to flood risk management, enabling the development of mitigation strategies.	Option CM2 is likely to generate the most beneficial effects against this objective.
10	Increase energy efficiency	+	LDP objective 1 seeks to make the best use of resources, which is likely to ensure that new development is energy efficient wherever possible.	+++	The development of a masterplan will enable a site-wide energy efficiency strategy to be developed and implemented.	Option CM2 is likely to generate the most beneficial effects against this objective.
11	Promote renewable energy production and use	?	LDP objective 1 seeks to make the best use of resources, which may increase the potential for the development of renewable energy. However, development on an ad hoc basis may lead to the loss of potential sites for renewable energy generation through a lack of strategic visioning.	+++	The development of a masterplan will enable a site-wide renewable energy strategy to be developed and implemented.	Option CM2 is likely to generate the most beneficial effects against this objective.
12	Promote the reduction of waste generation and landfill, and increase levels of recycling to achieve more sustainable waste management	+/-	An increase in development may lead to an increase in waste generation. Development decisions on a case by case basis may mean that the cumulative effects of development are not considered. However, implementation of the LDP will ensure that the best use of resources is made, which may	+++	The development of a masterplan will enable a site-wide sustainable waste management strategy to be developed and implemented.	Option CM2 is likely to generate the most beneficial effects against this objective.

			improve sustainable waste management.			
13	Promote sustainable, high quality design in all development to contribute to a higher quality built and natural environment whilst adapting to the potential impacts of climate change	+/-	Making planning decisions on a case by case basis may mean that overall design quality may be compromised and a sense of character not achieved. More sustainable design may be possible on a case by case basis, but the potential of sustainable design principles is not likely to be achieved.	+++	The development of a masterplan will enable a site-wide sustainable design strategy and action plan to be developed and implemented.	Option CM2 is likely to generate the most beneficial effects against this objective.
SOCIAL						
14	Improve equality of opportunities amongst all social groups	+	The development of the site may increase the provision of facilities for community use.	++	The development of a masterplan may ensure that the needs of all social groups are catered for, including the provision of facilities which are available for the entire community.	Option CM2 is likely to generate the most beneficial effects against this objective.
15	Improve the health and wellbeing of the population	+	The development of the site may increase the provision of leisure facilities for community use, increasing physical exercise levels.	+	The development of the site may increase the provision of leisure facilities for community use, increasing physical exercise levels.	Both options are likely to have similar effects on the health and wellbeing of the population.
16	Protect and provide improved local, social, recreational and leisure facilities for all sectors of the community, and improve access to them	+	The development of the site may increase the provision of facilities for community use.	++	The development of a masterplan may ensure that the needs of all social groups are catered for, including the provision of facilities which are available for the entire community.	Option CM2 is likely to generate the most beneficial effects against this objective.
17	Improve the quantity, quality, variety and affordability of housing	0	The site is unlikely to provide housing.	0	The site is unlikely to provide housing.	
18	To contribute to a reduction in crime and social disorder and the fear of crime,	?	The provision of a potential increase in facilities may decrease crime and social disorder	+	The provision of a potential increase in facilities may decrease crime and social disorder	Option CM2 is likely to generate the most beneficial effects against this objective.

	promoting safer neighbourhoods		dependent on the accessibility of these facilities.		dependent on the accessibility of these facilities. An SPD could ensure that the approach enables this effect.	
19	To conserve and enhance the historic environment of Newport	+	The implementation of the LDP objectives will ensure that the development of the site will conserve the historical environment.	++	The development of an SPD will enable more effective implementation of the LDP objectives to ensure that the development of the site will conserve as well as enhance the historical environment through more effective controls and deliver mechanisms..	Option CM2 is likely to generate the most beneficial effects against this objective.
20	To identify, promote, strengthen and enhance the cultural identity of Newport	++	The development of the site is likely to provide benefits for the cultural identity of Newport, building on the international profile developed through the Ryder Cup in 2010.	+++	The development of a masterplan could maximise the potential of the site to create a cultural focus for Newport, building on the international profile developed through the Ryder Cup in 2010.	Option CM2 is likely to generate the most beneficial effects against this objective.
ECONOMIC						
21	To enable high and stable levels of local employment in Newport	++	The development of the site may provide an increase in local employment levels.	+++	The development of a masterplan could maximise the potential of the site to create employment.	Option CM2 is likely to generate the most beneficial effects against this objective.
22	To support diverse and viable business growth and to achieve economic growth to contribute to business competitiveness, focusing on inward investment	++	Decision making on a site by site basis may encourage inward investment due to the minimalisation of planning controls to be implemented.	+/-	A masterplan for the site may encourage inward investment through the creation of a high quality holistic plan for development which may improve its attractiveness. Conversely, developers may be off put by an increase in restrictions and requirements for new development on the site.	Option CM1 is likely to generate the most beneficial effects against this objective.
23	To enhance the profile of Newport, and strengthen the tourist economy, sensitively capitalising on environmental, heritage,	++	The development of the site may enable the profile of Newport to be enhanced, building on the international profile developed through the Ryder Cup in 2010..	+++	The development of a masterplan for the site will enable its profile along with Newport's to be enhanced, through sensitively capitalising on its assets, building	Option CM2 is likely to generate the most beneficial effects against this objective.

	and leisure assets				on the international profile developed through the Ryder Cup in 2010..	
24	To contribute to educational attainment and increase skill levels to promote/develop a knowledge based economy	+	The potential increase in employment opportunities may increase educational attainment and skills levels through on-the-job training.	+	The potential increase in employment opportunities may increase educational attainment and skills levels through on-the-job training.	Both options are likely to have similar effects on educational attainment.
25	Reducing the need to travel by improving local service provision	?	Development of the site may increase local services. Reducing the need to travel is unlikely, as the site is located next to a major road, and thus travel by private car may increase.	?	Development of the site may increase local services. Reducing the need to travel is unlikely, as the site is located next to a major road, and thus travel by private car may increase.	Effects unknown at this stage.
26	Promote attractive and viable alternatives to car transport to achieve a modal shift to more sustainable modes of transport, including walking and cycling	?	Development of the site may increase local services. Reducing the need to travel is unlikely, as the site is located next to a major road, and thus travel by private car may increase.	++	Development of a masterplan will allow the development of a travel plan to encourage a modal shift to more sustainable modes of transport.	Option CM2 is likely to generate the most beneficial effects against this objective.
27	To seek to improve the vitality and viability of the City Centre	+	Developing the site may increase visitors from outside the plan area, which could increase tourist numbers who may also visit the city centre.	++	Developing the site may increase visitors from outside the plan area, which could increase tourist numbers who may also visit the city centre. An SPD could ensure that a more comprehensive approach to this effect can be taken.	Option CM2 is likely to generate the most beneficial effects against this objective.

C.8 Airport

Table C.8 – Airport

SA Objectives		A1 Do Nothing In view of Newport City Council not having the jurisdiction to approve an international airport, the LDP could exclude any specific attention to the concept pending any favourable indication of support from the Government.		A2 Support the Concept of an Airport The LDP could give some support to the concept, although this would probably have to be limited until formal proposals had been submitted under relevant legislation.		A3 Not Support the Concept of an Airport The LDP could state that an airport proposal would not be welcomed.		A4 Note the Concept In view of the uncertainties of the proposal and the enormous amount of studies that would be required to establish, the LDP should just note the proposal. Should further information become available, and if there should be some indication of willingness on the part of Government to address the issue, then this should be reflected in a subsequent review of the LDP.		Comparison of the Options
		Score	Comments	Score	Comments	Score	Comments	Score	Comments	
Scale of Effect (SE): 0 – no effect; +++ strongly positive; ++ moderately positive; + slightly positive; ? effect unknown/unable to be predicted at this stage --- strongly negative; -- moderately negative; - slightly negative										
ENVIRONMENTAL										
1	Protect and enhance existing valued landscapes and open spaces and encourage their sustainable use, enjoyment and	0	No obvious direct effects.	--	Supporting the concept of an airport may lead to negative landscape implications, especially if the development of the airport would lead to the promotion of a motorway across the Gwent Levels.	++	Objecting to the airport proposal may help to protect valuable landscapes, especially if the development of the airport would lead to the promotion of a motorway across the Gwent Levels..	+	Awaiting further information may ensure that potential effects on landscapes can be mitigated.	It is considered that option A3 will have the most beneficial effect against this sustainability objective.

	management									
2	To protect, manage and enhance biodiversity	0	No obvious direct effects.	--	Supporting the concept of an airport may lead to extensive negative implications for biodiversity. However, these are likely to be mitigated as a result of the habitats regulations, which will ensure that potentially harmful development does not proceed without adequate mitigation in place.	+++	Objecting to the airport proposal may help to protect biodiversity.	+	Awaiting further information may ensure that potential effects on biodiversity can be mitigated.	It is considered that option A3 will have the most beneficial effect against this sustainability objective.
3	To ensure efficient use of land and protect geodiversity, soil quality and mineral resources	0	No obvious direct effects.	--	Supporting the concept of an airport may lead to negative implications on land and soils through the increase in hardstanding of a considerable amount of land which will be necessary for buildings and runways.	+++	Objecting to the airport proposal may help to protect land and soil quality through preventing large scale development.	+	Awaiting further information may ensure that potential effects can be mitigated.	It is considered that option A3 will have the most beneficial effect against this sustainability objective.
4	To improve air quality	0	No obvious direct effects.	---	Supporting the concept of an airport may lead to negative implications for air quality through an	0	No obvious direct effects.	0	No obvious direct effects.	It is considered that option A2 will have the most negative effects against this sustainability objective.

					encouragement of air travel.					
5	To reduce emissions of greenhouse gases	0	No obvious direct effects.	---	Supporting the concept of an airport may lead to significant contributions to greenhouse gas emissions through an encouragement of air travel.	0	No obvious direct effects.	0	No obvious direct effects.	It is considered that option A2 will have the most negative effects against this sustainability objective.
6	To minimise noise pollution	0	No obvious direct effects.	---	Supporting the concept of an airport may lead to the significant increase in noise pollution which will mainly affect residents in the flight path.	0	No obvious direct effects.	+	Awaiting further information may ensure that potential effects can be mitigated.	It is considered that option A4 will have the most beneficial effect against this sustainability objective.
7	To maintain and, where possible, enhance water quality	0	No obvious direct effects.	---	Supporting the concept of an airport may lead to the significant increase in water pollution as the airport will be developed in the estuary area.	++	Objecting to the airport will help to maintain water quality.	+	Awaiting further information may ensure that potential effects can be mitigated.	It is considered that option A3 will have the most beneficial effect against this sustainability objective.
8	To reduce water consumption	0	No obvious direct effects.	0	No obvious direct effects.	0	No obvious direct effects.	0	No obvious direct effects.	
9	To minimise the risk of and from flooding	0	No obvious direct effects.	--	Supporting the concept of an airport may lead to an increase in the risk of flooding through an increase	0	No obvious direct effects.	+	Awaiting further information may ensure that potential effects can be	It is considered that option A4 will have the most beneficial effect against this sustainability objective.

					in hard surfacing in a high flood risk area.				mitigated.	
10	Increase energy efficiency	0	No obvious direct effects.	0	No obvious direct effects.	0	No obvious direct effects.	0	No obvious direct effects.	
11	Promote renewable energy production and use	0	No obvious direct effects.	---	Supporting the development of the airport may conflict with the promotion of a renewable energy generation scheme in the estuary.	++	Objecting to the scheme may enable the possibility of a sustainable renewable energy scheme in the estuary to proceed.	+	Awaiting further information may ensure that potential effects can be mitigated.	It is considered that option A3 will have the most beneficial effect against this sustainability objective.
12	Promote the reduction of waste generation and landfill, and increase levels of recycling to achieve more sustainable waste management	0	No obvious direct effects.	0	No obvious direct effects.	0	No obvious direct effects.	0	No obvious direct effects.	

13	Promote sustainable, high quality design in all development to contribute to a higher quality built and natural environment whilst adapting to the potential impacts of climate change	0	No obvious direct effects.	+	The design of the airport is likely to comply with sustainable design standards, in order to minimise effects on the environment and be in compliance with LDP objectives.	0	No obvious direct effects.	0	No obvious direct effects.	It is considered that option A2 will have the most beneficial effect against this sustainability objective.
SOCIAL										
14	Improve equality of opportunities amongst all social groups	0	No obvious direct effects.	+/-	The support of an airport may increase environmental inequalities for those living within the impact zone of the site including air, noise, visual and light pollution, increased traffic and a loss of open space. However, the development of an airport may increase opportunities for travel or employment for the local population which may not otherwise be present.	-	Opposing the airport may reduce employment and travel opportunities for local people as potential development may locate where international travel opportunities are more easily available.	0	No obvious direct effects.	It is considered that option A3 will have the most negative effects against this sustainability objective.

15	Improve the health and wellbeing of the population	0	No obvious direct effects.	---	Supporting the concept of an airport in an estuary location may increase the risk of accidents occurring from the threat of bird strikes. The estuary wetlands are a significant habitat for birds.[8]	0	No obvious direct effects.	0	No obvious direct effects.	It is considered that option A2 will have the most negative effects against this sustainability objective.
16	Protect and provide improved local, social, recreational and leisure facilities for all sectors of the community, and improve access to them	0	No obvious direct effects.	+/-	Development of an airport could potentially increase social and recreational facilities for the community, through an increase in development associated with the airport, as well as direct opportunities from an increase in travel opportunities. However, this may lead to a loss of important countryside areas.	+/-	Objecting to the airport could enable the protection of the estuary area and landscape, which is a recreational area for the community. However, this may mean that leisure opportunities do not improve.	0	No obvious direct effects.	Both objecting to and advocating the airport proposals could have positive and negative effects on access to leisure facilities.
17	Improve the quantity, quality, variety and affordability of	0	No obvious direct effects.	++	The development of an airport may attract the development of further housing	0	No obvious direct effects.	0	No obvious direct effects.	It is considered that option A2 will have the most beneficial effect against this sustainability

[8] *'birds are an acknowledged threat at airports, particularly where runways are close to water…The low but in eradicable threat of bird strikes is one of the factors counting against the construction of an international airport in the middle of the Thames estuary – mooted by the mayor of London, Boris Johnson, as an alternative to Heathrow airport. According to a 2003 report, "the risks posed by bird strike would be expected to be greater at estuarine sites … than at conventional inland sites." '* http://www.guardian.co.uk/world/2009/jan/16/new-york-air-crash-bird-strike

	housing				through an increased attractiveness of the area as the 'Gateway to Wales'.					objective.
18	To contribute to a reduction in crime and social disorder and the fear of crime, promoting safer neighbourhoods	0	No obvious direct effects.	0	No obvious direct effects.	0	No obvious direct effects.	0	No obvious direct effects.	
19	To conserve and enhance the historic environment of Newport	0	No obvious direct effects.	-	Supporting the airport may have negative consequences for the historic environment, especially if the Gwent Levels are affected. This effect is likely to be minimised through the implementation of mitigation measures required by the LDP and national policy.	++	Objecting to the airport may help to preserve the historic environment, especially if the development of the airport would lead to the promotion of a motorway across the Gwent Levels.	+	Awaiting further information may ensure that potential effects can be mitigated.	It is considered that option A3 will have the most beneficial effect against this sustainability objective.
20	To identify, promote, strengthen and enhance the cultural identity of Newport	0	No obvious direct effects.	++	Development of the airport may help to strengthen the identity of the community through promotion of the City as the gateway to Wales.	0	No obvious direct effects.	0	No obvious direct effects.	It is considered that option A2 will have the most beneficial effect against this sustainability objective.

ECONOMIC										
21	To enable high and stable levels of local employment in Newport	0	No obvious direct effects.	+++	Supporting the airport proposals may increase local employment as the prospect of an airport may attract further growth in business in the area. If an airport were to be developed, it would likely provide a significant number of direct and indirect employment opportunities.	0	No obvious direct effects.	+	Noting the concept of the potential for an airport in the plan area may attract further growth in business.	It is considered that option A2 will have the most beneficial effect against this sustainability objective.
22	To support diverse and viable business growth and to achieve economic growth to contribute to business competitiveness, focusing on inward investment	0	No obvious direct effects.	++	Supporting the airport proposals is likely to attract businesses to the area and increase inward investment in Newport.	-	Stating that an airport would not be welcomed may lead to the loss of business growth, as opportunities may choose to locate in more internationally accessible locations.	+	Noting the concept of the potential for an airport in the plan area may improve inward investment through the indication that the idea of international connectivity is being considered.	It is considered that option A2 will have the most beneficial effect against this sustainability objective.
23	To enhance the profile of Newport, and strengthen the tourist economy, sensitively capitalising on	0	No obvious direct effects.	+/-	The development of the airport may increase the profiled of Newport as the Gateway to Wales and improve ease of access for tourist visitors to	+	Stating that an airport may protect environmental, heritage and leisure assets.	0	No obvious direct effects.	It is considered that option A3 will have the most beneficial effect against this sustainability objective.

	environmental, heritage, and leisure assets				the area. However, supporting the airport proposals may lead to the loss of important environmental, heritage and leisure assets through the loss of the severn estuary and its associated habitats, open space. The possibility of development on the Gwent Levels for access may damage this important heritage asset.					
24	To contribute to educational attainment and increase skill levels to promote/develop a knowledge based economy	0	No obvious direct effects.	+	The development of the airport could potentially increase employment opportunities and associated businesses, which may increase local vocational skills levels and training.	0	No obvious direct effects.	0	No obvious direct effects.	It is considered that option A2 will have the most beneficial effect against this sustainability objective.
25	Reducing the need to travel by improving local service provision	0	No obvious direct effects.	+	Local service provision may increase as a result of the airport development, which may encourage subsidiary development.	0	No obvious direct effects.	0	No obvious direct effects.	It is considered that option A2 will have the most beneficial effect against this sustainability objective.

26	Promote attractive and viable alternatives to car transport to achieve a modal shift to more sustainable modes of transport, including walking and cycling	0	No obvious direct effects.	---	Supporting the concept of an airport will promote the concept of air travel and, inevitably, road based transport and access via the motorway. This opposes the aims of this sustainability objective.	+++	Stating that an airport would not be welcomed would give credibility to a transport strategy for the plan area that could focus on achieving a modal shift to more sustainable modes of transport.	0	No obvious direct effects.	It is considered that option A3 will have the most beneficial effect against this sustainability objective.
27	To seek to improve the vitality and viability of the City Centre	0	No obvious direct effects.	++	Supporting the concept of the airport may increase the vitality and viability of the city centre through an increase in visitor numbers as well as an increase in the profile of Newport and subsequent economic growth.	0	No obvious direct effects.	0	No obvious direct effects.	It is considered that option A2 will have the most beneficial effect against this sustainability objective.

Appendix D - Candidate Sites Strategic Assessment

D.1 Development of Strategic Sites

D.1.1 Strategic sites identified in the Candidate Sites Register for the Newport LDP have been subject to an assessment in order to determine their performance in sustainability terms, with reference to social, environmental and economic factors. The list of sites assessed is presented in ***Table D.1*** and shown on the map in ***Figure D.1***. The rationale used for the sites assessment, its results and a discussion of the relative merits and disadvantages of the strategic sites options are set out below.

D.1.2 Existing SA guidance recognises that the most familiar form of SA prediction and evaluation is generally broad-brush and qualitative. It is recognised that quantitative predictions are not always practicable and broad-based and qualitative predictions can be equally valid and appropriate. Examples of the prediction and evaluation techniques for assessing significance of effects are expert judgement, dialogue with stakeholders and public participation, geographical information systems, reference to legislation and regulations and environmental capacity. Many of these techniques have been employed in this assessment.

Assessment Methodology

D.1.3 The original site appraisal was undertaken by NCC, to inform the development of the LDP. The Newport Sites Assessment Methodology led to the agglomeration of a number of candidate sites, forming the 46 strategic sites as shown in ***Table D.1***. The original candidate sites were first assessed for compatibility by the LDP team using the candidate sites form. The subsequent candidate sites forming the strategic sites have been assessed to demonstrate compatibility with the SA process. Sites were assessed from a strategic perspective to reduce repetition in assessments due to their similar locational characteristics. Where there were notable differences, these were noted in the commentary and recommendations.

Table D.1 - Candidate Sites for Assessment

Site name	Representation Numbers and Proposed uses
1. Uskmouth/ Sloblands	**1673.C1** Mixed-use employment led development, where the following uses could be achieved: • General business, warehousing and industry; • Rail related business activity; • Potentially landfill (to level existing lagoons on site); • Waste and waste recycling/transfer; • Energy production (including micro generation); • Other civic and commercial uses; and • Mixed-use employment led development. **1674.C1** Mixed use employment development, which could comprise the following uses: • Energy production; • Rail related business; • Waste recycling; • Waste to energy facilities; • General business and industry; • New roads and infrastructure; • Civic and institutional uses; and • Other mixed/commercial uses.
2. Traston	**2095.C1**

Site name	Representation Numbers and Proposed uses
	• Outdoor Sport and Play Space.
3. Tredegar	**1445.C1** • Residential development. **1602.C1** • Cycle path (National Cycle Route 4). **28.C1** • Residential (200 units) & Public Open Space.
4. St Cadocs	**155.C1** • Residential-led mix of uses. **1525.C2** • Residential.
5. Solutia	**169.C1** • Industrial or Commercial. **232.C3** • Employment.
6. Whiteheads	**198.C1** • Development of up to 850 residential units. **232.C2** • Mixed use, comprising residential, commercial and associated uses.
7. Royal Gwent	**155.C2** • Residential-led mix of uses including retail and employment. **155.C3** • Residential with some community uses.
8. Rogerstone	**53.C1** • Residential. **1510.C1** • Residential. **321.C1** • Health use complementary to children's centre. **1232.C2** • Residential. **2073.C1** • Residential. **2073.C2** • Residential.
9. Queenshill	**1232.C1** • New residential and existing education.
10. Redwick	**1425.C1** • To build one residence. **1633.C1** • Agricultural.
11. Pirelli	**232.C4** • Residential and employment.
12. Petrepoeth	**65.C2** • Residential and associated uses - in the region of 175 units. **144.C1**

Site name	Representation Numbers and Proposed uses
	• Residential Development. **1525.C6** • Residential development. **1666.C1** • Residential & Education/Leisure use. **1666.C2** • Education/Leisure use.
13. Pilton Vale	**142.C1** • Residential development.
14. Penhow	**2059.C1** • Protection of land. **2074.C1** • Residential.
15. Penrhos Farm	**300.C1** • Museum and visitor centre, employment, low density housing, affordable housing, country, leisure and recreation park.
16. Peterstone	**2075.C2** • 2x Dwelling house.
17. Ringland	**2041.C1** • Leisure for children, dog walking, child's park, football pitch. **2041.C2** • Protection of Leisure areas. **2041.C3** • Protection of Open Space. **2041.C4** • Protection of Open Space.
18. Parc Seymour	**1341.C1** • Housing and open space. **51.C1** • Open Space / Recreation. **51.C2** • Children's Playground & Recreation Field. **51.C3** • Open Space / Recreation. **51.C4** • Open Space / Recreation. **1468.C1** • Housing with public open space. **2049.C1** • Residential.
19. Novelis	**1562.C1** • Residential development.
20. Michaelstone	**2075.C1** • Residential.
21. Marshfield West	**302.C1** • Mixed use: residential, community facilities, minor retail.

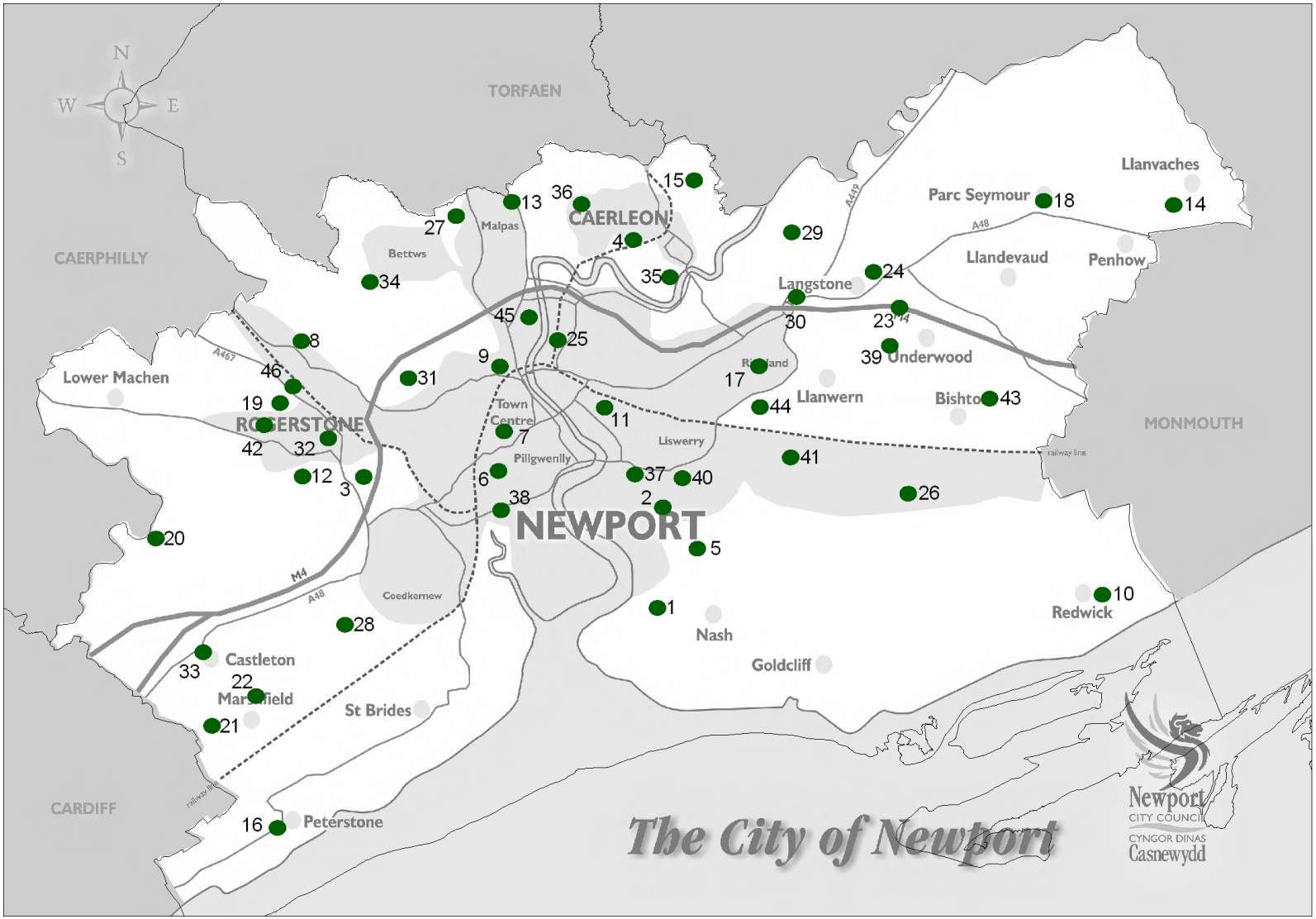
Site name	Representation Numbers and Proposed uses
	1667.C1 • Mixed use: residential, community facilities, minor retail. **2061.C1** • Housing and open space.
22. Marshfield East	**1525.C3** • Residential development. **2050.C1** • Residential with social housing. **2050.C2** • Small scale residential to contain proportion of social housing.
23. Langstone South	**1400.C1** • Residential. **2077.C1** • Construct one house. **1668.C1** • Residential. **2051.C1** • New community centre for the residents of Langstone, with provision for sports facilities, local shop, post office and public open spaces. **1400.C2** • Residential.
24. Langstone North	**1343.C1** • Mixed use; predominantly residential. **132.C1** • Mixed use - residential / employment / commercial.
25. Herbert Road	**1521.C1** • Residential / mixed use. **2060.C1** • Residential.
26. Llanwern	**1420.C1** • General business and industry; • Offices, research and development facilities, either building on existing facilities or independently; • 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 • Residential development (including elderly and student accommodation). **1669.C1** • Employment/Business use. **329.C1** • Employment.
27. Malpas	**1525.C1** • Residential Development. **1525.C7**

Site name	Representation Numbers and Proposed uses
	• Residential development. **2076.C1** • Residential.
28. Duffryn	**140.C1** • Comprehensive development to include residential / commercial / industrial uses. **1525.C5** • Residential development. **232.C1** • Employment, including B1, B2, B8 and ancillary commercial uses. A masterplan would determine the mix of uses. **1664.C1** • A sustainable Business Park for up to 50,000 sq m of B1 office floor space, along with associated support services and uses, car parking, landscaping and public open space, for Government Office relocations. **2053.C1** • Retail and / or Hotel and Conferencing Facilities.
29. Celtic Manor	**1623.C1** • Hotel; exhibition centre; residential use; staff accommodation; office use; conference centre; specialist sports village; complementary recreational and cultural uses that could include a riverside restaurant, bar and associated accommodation; riverside path and cycleways; an arts and crafts centre; low-key outdoor recreational uses; transport and flood risk improvements; park and ride; golf facilities; open-air concerts and cultural opportunities and; relocation of the listed building.
30. Coldra	**333.C1** • Leisure/recreation/commercial.
31. Allt yr Yn	**299.C1** • Tourism, visitor accommodation - log cabins/hotel, extremely low density housing.
32. Bassaleg	**28.C5** • Mixed Residential. **28.C6** • Elderly accommodation.
33. Castleton	**1415.C1** • Residential. **2057.C1** • Residential. **2062.C1** • Residential. **2065.C1** • Residential development. **2070.C1** • Residential. **1309.C1** • Residential.
34. Bettws	**1117.C1**

Site name	Representation Numbers and Proposed uses
	• Residential. **1117.C2** • Residential.
35. Broadway	**303.C1** • Leisure/recreation and residential.
36. Caerleon North	**1501.C1** • Residential. **1665.C1** • Creation of a link road. Mixed use allocation, potentially including residential, employment, community uses, open space, education facilities, governmental uses and healthcare uses.
37. Carcraft	**1670.C1** • Mixed use development to include residential (including student and elderly accommodation), employment, retail and leisure uses.
38. Retail East	**2046.C1** • Existing retail floorspace to operate with an open A1 consent.
39. Eastern Expansion Area	**65.C1** • Residential and associated uses. **250.C1** • Residential-led mixed use development. A master plan will be developed to determine the precise mix of uses.
40. Coleg Gwent	**76.C1** • Continued use as college campus or re-development for mixed use including business, residential, office and leisure uses.
41. Glan Llyn	**1466.C1** • Mixed use urban extension including 4000+ new homes, public open space, a district centre, new schools and a new business park, together with new infrastructure, groundworks, landscaping ancillary works and activities.
42. Gloch Wen	**2072.C1** • Residential and open space. **2072.C2** • Residential and open space. **2072.C3** • Residential and open space.
43. Airport	**1654.C1** • Airport with runways in estuary and landside facilities surrounding Bishton, north of steelworks and railway.
44. adj Hartridge	**1525.C4** • Residential development. **1525.C8** • Residential Development.
45. Crindau	**1511.C1** Mixed use regeneration of land at Crindau Gateway comprising: • a range of new homes including apartments, houses, student accommodation and some sheltered accommodation for the elderly (Use Classes C2 and C3); • a hotel (Use Class C1);

Site name	Representation Numbers and Proposed uses
	• commercial and office development (Use Classes B1,B2 and B8); • a local centre incorporating small-scale retail / local bars, cafes, and licensed premises (Use Classes A1, A2, A3 and D2), and healthcare and fitness facilities (Use Classes D1 and D2); • new internal roads, car parking, service yards, accesses, paths and highway safety improvements; • a flood defence scheme incorporating soft and hard treatment to the bankside environment and associated landscaping works; a network of open spaces, including recreation space, public realm and provision for pedestrians / cyclists; and other ancillary works, uses and activities. And requiring: • site clearance, treatment and preparation, including demolition of existing buildings; • the installation of new services and infrastructure; • improvements and works to the highway network, and • other ancillary works and activities **224.C1** • Residential and Hotel Development. **224.C2** • Retail (food and non food). Site already benefits from outline planning consent for retail development / mixed use scheme.
46. DIY	**28.C3** • Retail. **28.C4** • Commercial. **28.C2** • Residential.

Figure D.1 - Map of Candidate Site Locations



Newport Candidate Site Methodology

D.1.4 The Candidate Sites Form used for the NCC original collation of data for each site was developed by the Council, with consideration of the SA Framework, and is shown in ***Figure D.2.***

D.1.5 The methodology used by NCC to assess the candidate sites was reviewed in relation to the SA objectives in the SA framework to ensure consistency with the SA. Consequently, a number of additional criteria, shown in blue text in **Table D.3**, are recommended for inclusion in the site assessment methodology in order to fully reflect the objectives of the SA Framework.

Figure D.2 - Newport City Council Candidate Sites Form (March 2009)

2 Basic Site Details

2.1	Site Name	
2.2	Location (street name, postcode or other identification)	
2.3	Ordnance Survey Grid Reference	
2.4	Site Area (Hectares)	
2.5	Brief Description, including topography and significant features	
2.6	Current use	
2.7	Proposed use(s)	

3 Environmental Issues (Grey boxes should not be filled in)

Please tick Yes or No where appropriate, and provide any further information requested				
Qu No:	Question	Yes	No	Further Information
3.1	Is the site previously developed land?[1] If so, what was the previous use(s)?			
3.2	Is the site Greenfield?			
3.3	Is there a risk that the land is contaminated? If so what is the potential contamination and source of it, and how would it be dealt with?			
3.4	Is the site in a flood risk area? If so, what is the development advice zone (see TAN15[2]) and how would the issue be addressed?			
3.5	Is the site adjacent to a water course?			

[1] For a definition of previously developed land, see Figure 2.1 page 24 Planning Policy Wales, available at: www.wales.gov.uk/desh/publications/planning/ppw/ppw2002e.pdf?lang=en

[2] Technical Advice Note 15: Development and Flood Risk, Welsh Assembly Government, July 2004, available at: http://new.wales.gov.uk/docrepos/40382/epc/planning/403821/40382/403821/(560)_july04-tan15-e.pdf?lang=en

3.6	Does the site's topography or stability present any problems to its development? If so, give details.			
3.7	Is the site subject to any environmental protection designations (eg a Site of Special Scientific Interest[3])? If so, give details, including of any nearby sites.			
3.8	Is it likely that there are any protected species[4] on or near the site? If so, give details.			
3.9	Does the site include a Conservation Area[5] or a Listed Building? If so, give details.			
3.10	Is the site in a potential minerals safeguarding area (eg for sand and gravel or limestone)? If so, give details.			
3.11	Is the site in agricultural use, or was that its last use? If so, what is its Agricultural Land Classification?			
3.12	How would you describe the quality of the local landscape or environment, and how intrusive would development be within it, and from where would it be visible?			
3.13	Are there mature trees or hedgerows on the site? If so, are they protected?			

[3] SSSIs and some other environmental designations are shown in the adopted Newport Unitary Development Plan, available at: www.newport.gov.uk/_dc/index.cfm?fuseaction=planning.udp

[4] As designated under European and British law, including the Natural Environment and Rural Communities Act 2006 available at: www.opsi.gov.uk/acts/acts2006/ukpga_20060016_en_1 and the Wildlife and Countryside Act 1981 referred to at: www.jncc.gov.uk/default.aspx?page=1377
See also the Newport Draft Nature Conservation Strategy, available at: www.newport.gov.uk/stellent/groups/public/documents/plans_and_strategies/n_051051.pdf
Or see the South East Wales Biological Records Centre (SEWBReC) at: www.sewbrec.org.uk (charges may be made for data).

[5] Conservation Areas are shown on the adopted Newport Unitary Development Plan available at: www.newport.gov.uk/_dc/index.cfm?fuseaction=planning.udp

3.14	In what ways could development of the site retain and/or enhance biodiversity or landscape features within or near the site?			
3.15	Does the site present an opportunity for the maintenance and enhancement of green spaces and corridors throughout the urban area including river corridors?			
3.16	Is there an archaeological site in or in the vicinity of the proposed site? If so, give details[6].			

4 Access

Please tick Yes or No where appropriate, and provide any further information requested				
Qu No:	Question	Yes	No	Further Information
4.1	Is the site accessible from the public highway? If so, is the highway capable of supporting the level of traffic likely to be generated by the proposed development?			
4.2	How far is it to the nearest bus route?			
4.3	What is the typical daytime frequency of buses per hour on that route?			
4.4	How far is it to the nearest railway station?			
4.5	How far is it to the nearest convenience shop? How many shops are there at that location?			

[6] Required information can be sought from the Glamorgan-Gwent Archaeological Trust; Email planning@ggat.org.uk or Tel 01792 634223 (charges may be made for data).

4.6	How accessible is the site to jobs and community services?			
4.7	How would walking and cycling be encouraged by this development?			
4.8	Are there any public rights of way on or adjoining the site? If so, please mark on the site plan.			
4.9	How far is it to the nearest area of usable open space?			
4.10	In what ways would development of this site improve links to open space?			
4.11	In what ways would development of this site help to improve connectivity to public transport?			

5 Community Issues

Please tick Yes or No where appropriate, and provide any further information requested				
Qu No:	Question	Yes	No	Further Information
5.1	Are there any schools or other community facilities in the area? If so, what and where?			
5.2	Has development of this site been discussed with the community? If so, please give details.			
5.3	How could community aspirations be met in the development of this site?			
5.4	Would development of this site result in the loss of any facilities, such as playgrounds, sports grounds of allotments? If so, give details.			

6 Infrastructure and Context

Please tick Yes or No where appropriate, and provide any further information requested				
Qu No:	Question	Yes	No	Further Information
6.1	How far is the site from existing water, sewerage, electricity, gas and telecommunications services?			
6.2	Is the proposed use likely to give rise to any issues relating to the nature of adjacent uses (eg with regard to noise, smells, dust, traffic etc)? If so, what are the issues?			
6.3	Does sufficient infrastructure capacity exist to ensure the implementation of the development (including water supplies, sewerage and associated waste management facilities)? If no capacity exists, how will suitable provision be secured?			
6.4	Are employment, waste or mineral uses involved, either as proposed or adjoining uses? If so, what will be the distance between these uses and residential properties?			
6.5	In what ways would development of this site be a logical extension to existing development?			
6.6	In what ways would development of this site add to pressures, or provide opportunities, for other sites nearby to be developed or redeveloped?			

7 Land Ownership and Development Issues

Please tick Yes or No where appropriate, and provide any further information requested				
Qu No:	Question	Yes	No	Further Information
7.1	Is the site wholly in the ownership of the proposer? If not, have all other owners been notified of this submission?			
7.2	Are you the owner of the site? If not, what is your interest in the site?			
7.3	Do you have an interest in any adjoining or nearby land? If so, please indicate the boundary in blue on your plan.			
7.4	Do any restrictive covenants apply to the land or buildings? If so, please give details.			
7.5	Does the land have a realistic possibility of coming forward for development within the LDP period (2011 – 2026)? If so, would you expect a start on site to be within 1-3 years, 4-6 years, or 7+ years of the start of the LDP?			
7.6	Would the allocation of this land require a change to a boundary or designation in the adopted Newport Unitary Development Plan 1996 – 2011?[7] If so, what would need to be changed?			
7.7	Are there any unimplemented planning permissions on the site? If so, please give application numbers and details.			

[7] The UDP can be viewed at: www.newport.gov.uk/_dc/index.cfm?fuseaction=planning.udp

7.8	Have any planning applications been refused on the site since 1 January 2004? If so, please give application numbers and details.			
7.9	Are there any planning applications on the site which are not yet determined? If so, please give application numbers and details.			

8 Other Information

Please add any other information relevant to the proposed development of the site.

9 Map

Please include an Ordnance Survey based site plan, with the scale defined, with the candidate site edged in red, and any other nearby or adjoining land in your ownership edged in blue.

Modifications to Original SA Framework and Newport Candidate Site Methodology

D.1.6 The original SA Framework was devised to enable the assessment of LDP objectives, options and policies. Therefore, not all of the indicators and objectives included are relevant to the assessment of sites, as only direct effects that are based on actual sites can be measured. Additionally, criteria must be applicable to all sites. In order to enable site assessment, the following SA objectives have been removed from the SA Framework to create the Site-Specific SA Framework:

- SA Objective 5: To reduce emissions of greenhouse gases (locational factors that may enable the reduction of greenhouse gas emissions are considered under SA Objective 16. Other factors will be implemented by SA Objectives 11 and 26);
- SA Objective 8: To reduce water consumption (this will be dependent on LDP policy implementation);
- SA Objective 10: Increase energy efficiency (locational factors that may enable the reduction of greenhouse gas emissions are considered under SA Objective 16. Other factors will be implemented by SA Objectives 11 and 26);
- SA Objective 11: Promote renewable energy production and use (this should be implemented through LDP policies);

- SA Objective 13: Promote sustainable, high quality design in all development to contribute to a higher quality built and natural environment whilst adapting to the potential impacts of climate change (this should be implemented through LDP policies);
- SA Objective 15: Improve the health and wellbeing of the population (relevant elements subsumed into SA Objective 16);
- SA Objective 17: Improve the quantity, quality, variety and affordability of housing (this will be dependent on LDP policy implementation);
- SA Objective 18: To contribute to a reduction in crime and social disorder and the fear of crime, promoting safer neighbourhoods (this should be implemented through LDP policies as well as through SA objective 16 in the framework);
- SA Objective 20: To identify, promote, strengthen and enhance the cultural identity of Newport;
- SA Objective 22: To support diverse and viable business growth and to achieve economic growth to contribute to business competitiveness, focusing on inward investment (the type of employment that will be located on the site is unknown at this stage);
- SA Objective 24: To contribute to educational attainment and increase skill levels to promote/develop a knowledge based economy (relevant elements subsumed into SA Objective 16); and
- SA Objective 25: Reducing the need to travel by improving local service provision (covered by SA objective 16).

D.1.7 **Table D.3** shows the selected SA objectives, decision-aiding questions and detailed criteria utilised in the assessment of sites. It should be noted that this exercise was carried out using the previous iteration of the SA Framework, included in ***Appendix E***.

D.1.8 Where sustainability objectives have been retained in the framework for sites assessment, most of the indicators that are included within the assessment framework for the LDP objectives, options and policies have been retained where appropriate for the same reasons as listed above.

D.1.9 A number of additional indicators that do not appear in the Newport Candidate Sites Form are recommended. These are shown in **Blue** in **Table D.3**. The following additional site assessment indicators are recommended under the following SA objectives:

2. To protect, manage and enhance biodiversity

- Is the site subject any environmental protection designations (e.g. SSSI)? (or within 2km proximity)

4. To improve air quality

- Is the site within an AQMA?

14. Improve equality of opportunities amongst all social groups

- Will the site be located near or within a ward within the 100 most deprived in the country?

19. To conserve and enhance the historic environment of Newport

- Will the site negatively affect the Gwent Levels?
- Will the site negatively affect an area of ancient woodland?
- Will the site negatively affect a Scheduled Ancient Monument? (proximity: 40m)
- Will the site negatively affect a Registered Park or Garden? (proximity: 40m)

23. To enhance the profile of Newport, and strengthen the tourist economy, sensitively capitalising on environmental, heritage, and leisure assets

- Will the site protect or enhance features that may have tourism value?

27. To seek to improve the vitality and viability of the City Centre

- Is the site proposed for mixed use development including employment within the City Centre?

D.1.10 The results in the following section are a combination of the interpretation of the data collection undertaken by NCC in terms of the framework developed, alongside a comparison of the sites against constraints maps of Newport County Borough showing the following data:

- Gwent Levels Historic Landscape[9]
- SPA;
- SAC;
- SSSIs;
- SINCs;
- RAMSAR;
- Welsh Index of Multiple Deprivation;
- Air Quality Management Areas;
- TAN15; and
- Listed Buildings.

D.1.11 The use of these data has enabled the appraisal of the majority of the sites for the additional indicators recommended above.

D.1.12 The assessment of the sites was undertaken using the following qualitative assessment scale:

Table D.2 - Key to Strategic Sites Assessment

	In conformity with the criterion		Not relevant to criterion / Neutral effects
	Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified	?	Insufficient information is available
	In conflict with the criterion		

[9] http://www.ggat.org.uk/cadw/historic_landscape/Gwent%20Levels/English/GL_17.htm

Table D.3 - Candidate Sites Sustainability Appraisal Framework and Rationale

Blue: not on NCC form for sites

No	SA Objective	Decision Aiding Question	Detailed Criteria (brackets: relevant candidate sites form reference)
Environmental			
1	Protect and enhance existing valued landscapes and open spaces and encourage their sustainable use, enjoyment and management	Will it protect or enhance valued landscapes?	**Will the site enhance the quality of or lead to the increase of local valued landscapes?** (3.12) **In conformity with the criterion (Green)** • Area has already demonstrated ability to accommodate change (e.g. existing built up area) • Further development on previously developed land could improve landscape • Limited landscape effect due to land use in urban location (e.g. sports fields) • Limited landscape effect due to scale of proposed development (e.g. 1 dwelling) and mitigation proposed **Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified (Orange)** • Likely to have an effect although adjacent to built up area and use will be low impact, screened or low density • Nature of landscape will screen development to minimise effect **In conflict with the criterion (Red)** • Large area of undeveloped land to be developed • Likely to significantly modify existing character
		Will it improve access to areas for recreational use?	**Proximity to or affect on public rights of way**[10] (4.8) **In conformity with the criterion (Green)** • No PROW is likely to be affected • PROW(s) existing on site but unlikely to be affected due to land use proposed • Provision will be made for incorporation of PROWs into site design **Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified (Orange)** • Site includes PROW but effect unknown at this stage • PROW likely to be diverted

[10] Public rights of way include: footpaths; bridleways; Byways Open to All Traffic (BOATs) and Restricted Byways (formally designated as Roads Used as Public Paths)

No	SA Objective	Decision Aiding Question	Detailed Criteria (brackets: relevant candidate sites form reference)
			• PROW adjacent to the site and effect unknown at this stage **In conflict with the criterion (Red)** • PROW likely to be negatively affected.
			Is the nearest area of usable open space within walking or cyclable distance?[11] (4.9) **In conformity with the criterion (Green)** • Within 300m (6 minute walk) • Development to provide public open space **Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified (Orange)** • Within 10 minute walk **In conflict with the criterion (Red)** • Further **n/a** • not relevant to land use proposed
2	To protect, manage and enhance biodiversity	Will it protect, maintain or enhance sites designated for their nature conservation interest?	**Is the site subject any environmental protection designations (e.g. SSSI)? (or within 2km proximity)** (3.7) **In conformity with the criterion (Green)** • No **Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified (Orange)** • On the fringe (within 2km) • Yes, but designation could protect or enhance it **In conflict with the criterion (Red)** • Yes- part or all of the site
		Will it protect, maintain or	**Is it likely that there are any protected species on or near the site?** (3.8)

[11] No one should live more than a six-minute walk (300m) from their nearest natural green space (CCW): Promotion and provision of access, recreation and their benefits www.ccw.gov.uk

No	SA Objective	Decision Aiding Question	Detailed Criteria (brackets: relevant candidate sites form reference)
		enhance species of acknowledged conservation concern?	**In conformity with the criterion (Green)** • No protected species or detrimental effects predicted **Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified (Orange)** • Protected species on site likely, effect unknown at this stage, risk may be minimal due to land use proposed • Protected species on site likely, site would be subject to investigation/mitigation ahead of development • Woodland and Buildings on site may provide habitats for bats although no evidence of roosts **In conflict with the criterion (Red)** • Negative effects highly likely
		Will it protect, maintain or enhance features designated for their nature conservation interest or features important for nature conservation?	**Does the site contain protected or important mature trees? (3.13)** **In conformity with the criterion (Green)** • No • Yes, but will be retained • Not protected but will be retained **Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified (Orange)** • Trees on site, not protected • TPOs on site, although land use may enable their retention **In conflict with the criterion (Red)** • TPOs on site, uncertain as to whether or not they will be retained.
			Does the site contain protected or important hedgerows? (3.13) **In conformity with the criterion (Green)** • No • Yes, but will be retained • Not protected but will be retained **Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified (Orange)** • Hedgerows on site, not protected

No	SA Objective	Decision Aiding Question	Detailed Criteria (brackets: relevant candidate sites form reference)
			• Hedgerows on site, although land use may enable their retention **In conflict with the criterion (Red)** • Hedgerows on site, uncertain as to whether or not they will be retained.
			Will it protect, maintain or enhance green spaces or corridors important for ecological connectivity? (3.15) **In conformity with the criterion (Green)** • Yes • Would introduce green space into site **Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified (Orange)** • Will lead to the maintenance of greenspace, but may not necessarily be good for biodiversity • May lead to an overall loss, but corridors and green space to be maintained throughout the site **In conflict with the criterion (Red)** • No- potential negative effect to existing as next to river corridor • No-likely to lead to a loss of greenspace overall
3	To ensure efficient use of land and protect geodiversity, soil quality and mineral resources	Will it minimise the loss of greenfield land lost to development?	**Is the site previously developed land?** (3.1) **In conformity with the criterion (Green)** • Yes **Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified (Orange)** • Part of site is PDL • Development area is minor **In conflict with the criterion (Red)** • No **n/a** • Site is for green open space
			Is the site greenfield? (3.2) **In conformity with the criterion (Green)**

No	SA Objective	Decision Aiding Question	Detailed Criteria (brackets: relevant candidate sites form reference)
			• No **Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified (Orange)** • Yes, but site is for green open space • Part of the site is greenfield **In conflict with the criterion (Red)** • Yes
		Will it minimise the loss of best and most versatile agricultural land to development?	**Will it lead to the loss of best and most versatile agricultural land (grades 1, 2 and 3?)** (3.11) **In conformity with the criterion (Green)** • No **Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified (Orange)** • Agricultural but low quality • Part of site is HQ AL • Value of AL is reduced by infrastructural barriers such as roads • Site is agricultural land but designated for employment or housing use previously **In conflict with the criterion (Red)** • Yes
		Will it protect mineral resources?	**Is the site in a potential minerals safeguarding zone?** (3.10) **In conformity with the criterion (Green)** • No **In conflict with the criterion (Red)** • Yes
		Will it maintain or enhance soil quality?	**Will it lead to the remediation of contaminated land?** (3.3) **In conformity with the criterion (Green)** • Development would lead to appropriate remediation of contaminated site • Land isn't contaminated but is previously developed so would not lead to a loss of quality

No	SA Objective	Decision Aiding Question	Detailed Criteria (brackets: relevant candidate sites form reference)
			• Retention of greenfield land **Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified (Orange)** • Large development of greenfield land- contamination possible • Soil test pending **In conflict with the criterion (Red)** • Would most likely lead to an increased contamination of land due to land use proposed
4	To improve air quality	Will it improve air quality?	**Will the proposed use increase air pollution (from traffic or industrial processes)?** (6.2) **In conformity with the criterion (Green)** • No • Likely to be an improvement compared to previous use on site **Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified (Orange)** • May be an increase although sustainable transport provision proposed to minimise growth • May be a slight although probably insignificant traffic increase as previous and proposed uses are likely to have similar levels (e.g. hospital and training site to mixed use residential- both have all hours traffic) **In conflict with the criterion (Red)** • Site likely to lead to an increase in traffic overall through change of use of site for current use
			Is the site within an AQMA? **In conformity with the criterion (Green)** • No **In conflict with the criterion (Red)** • Yes
6	To minimise noise pollution	Will it increase noise pollution?	**Is the site to include a noisy land use next to a sensitive land use?** (6.2) **In conformity with the criterion (Green)** • No • Proposed use likely to improve/reduce noise pollution

No	SA Objective	Decision Aiding Question	Detailed Criteria (brackets: relevant candidate sites form reference)
			• No difference from existing use **Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified (Orange)** • Increase in noise pollution from traffic likely • Mix of uses could potentially lead to noise pollution for residents **In conflict with the criterion (Red)** • Housing next to major road/increased industrial activity
7	To maintain and, where possible, enhance water quality	Will it increase water pollution?	**Is the site adjacent to a watercourse?** (3.5) **In conformity with the criterion (Green)** • No **Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified (Orange)** • No, but complex mix of drains inside and outside of the site • Not adjacent but close • Yes, but development will ensure its avoidance/no negative effects **In conflict with the criterion (Red)** • Yes: watercourses/reens throughout the site
			Does the site have adequate water and sewerage infrastructure? (6.3) **In conformity with the criterion (Green)** • Yes **Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified (Orange)** • Some upgrading required • Septic tank proposed **In conflict with the criterion (Red)** • No
9	To minimise the risk of and from	Will it minimise the risk of flooding	**Does the site lie within the development advice zone (TAN15) and have a non compatible use?** (3.4)

No	SA Objective	Decision Aiding Question	Detailed Criteria (brackets: relevant candidate sites form reference)
	flooding	to people and property?	**In conformity with the criterion (Green)** • No **Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified (Orange)** • Yes but site benefits from flood defences (TAN 15 DAMs will shortly be updated and will clarify the position) (C1) • Part of site is within flood zone, although a small area which is to be avoided by development • Yes but building design will seek to mitigate and site is currently impermeable • No, but scale of development on greenfield land may increase risk from an increase in surface water run off **In conflict with the criterion (Red)** • C2
12	Promote the reduction of waste generation and landfill, and increase levels of recycling to achieve more sustainable waste management	Will the site enable a reduction in waste generation?	**Does the site have adequate waste management facilities?** (6.3) **In conformity with the criterion (Green)** • Yes **Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified (Orange)** • Upgrades required **In conflict with the criterion (Red)** • No
Social			
14	Improve equality of opportunities amongst all social groups	Will it reduce poverty and social exclusion in those areas most affected?	**Will the site be located near or within a ward within the 100 most deprived in the country?** **In conformity with the criterion (Green)** • Yes and development is likely to enable a reduction in inequalities (e.g. provision of employment or community facilities) **Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified (Orange)** • Moderately area of deprivation

No	SA Objective	Decision Aiding Question	Detailed Criteria (brackets: relevant candidate sites form reference)
			• Adjacent to area of high deprivation and suitable land use to enable a reduction in inequalities **In conflict with the criterion (Red)** • Not in area of deprivation and development may increase inequalities by reducing development in deprived areas and providing increased facilities, services, employment and high quality housing in areas of low deprivation. **n/a** • Site too small to have an effect • Use proposed unlikely to affect
16	Protect and provide improved local, social, recreational and leisure facilities for all sectors of the community, and improve access to them	Will it improve accessibility to key local services, facilities and employment opportunities?	**Will the development lead to a loss of community facilities?** (5.4) **In conformity with the criterion (Green)** • No **Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified (Orange)** • Potential loss **In conflict with the criterion (Red)** • Yes
			Is the local convenience shop within walking or cycling distance? (see***Table 7.1)*** (4.5) **In conformity with the criterion (Green)** • Yes • Will be provided as part of development proposals **Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified (Orange)** • Cycling distance • Slightly more that Table 3.4 requirements **In conflict with the criterion (Red)** • No
			Is the range of shopping facilities available likely to be adequate? (see***Table 7.1***) (4.5)

No	SA Objective	Decision Aiding Question	Detailed Criteria (brackets: relevant candidate sites form reference)
			In conformity with the criterion (Green) • Yes • Will be provided as part of development proposals **In conflict with the criterion (Red)** • No
			Are key local services within walking or cycling distance? (see***Table 7.1***) **In conformity with the criterion (Green)** • Yes • Will be provided as part of development proposals **Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified (Orange)** • Cycling distance • Slightly more that Table 3.4 requirements **In conflict with the criterion (Red)** • No
			Are employment opportunities within walking or cycling distance? see***Table 7.1)*** **or within 30 mins travel by public transport?** (4.6) **In conformity with the criterion (Green)** • Employment site close to residential area • Employment provided on-site as part of a mix of uses including residential **Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified (Orange)** • Within 1km • Accessible by public transport **In conflict with the criterion (Red)** • No
			Are educational opportunities within walking or cycling distance? (see***Table 7.1***) or within 30 mins travel by**

No	SA Objective	Decision Aiding Question	Detailed Criteria (brackets: relevant candidate sites form reference)
			public transport? (5.1) **In conformity with the criterion (Green)** • Education site close to residential area • Education provided on-site as part of a mix of uses including residential **Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified (Orange)** • Within 1km • Accessible by public transport **In conflict with the criterion (Red)** • No
19	To conserve and enhance the historic environment of Newport	Will it conserve or enhance sites, features and areas of historical value?	**Will the site negatively affect a Conservation Area?** (3.9) **In conformity with the criterion (Green)** • No **Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified (Orange)** • Adjacent but site to be developed sensitively • May affect setting **In conflict with the criterion (Red)** • Yes
			Will the site negatively affect any listed buildings on or adjacent to the site? (3.9) **In conformity with the criterion (Green)** • No **Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified (Orange)** • Adjacent but site to be developed sensitively • May affect setting **In conflict with the criterion (Red)** • Yes

No	SA Objective	Decision Aiding Question	Detailed Criteria (brackets: relevant candidate sites form reference)
			Will the site negatively affect an Area of Archaeological Importance or potential archaeological site? (proximity: 40m) (3.16) **In conformity with the criterion (Green)** • No • Will be enhanced as a feature of the development **Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified (Orange)** • Potential for site to have archaeological importance **In conflict with the criterion (Red)** • Site is within an archaeologically sensitive area
			Will the site negatively affect the Gwent Levels? **In conformity with the criterion (Green)** • No **Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified (Orange)** • Site within Gwent Levels but small scale so potential negative effect minor • Directly adjacent to GL historic landscape **In conflict with the criterion (Red)** • Within GL historic landscape and likely negative effects
			Will the site negatively affect an area of ancient woodland? **In conformity with the criterion (Green)** • No/previously developed site **In conflict with the criterion (Red)** • Negative effects likely
			Will the site negatively affect a Scheduled Ancient Monument? (proximity: 40m) **In conformity with the criterion (Green)** • No- previously developed site

No	SA Objective	Decision Aiding Question	Detailed Criteria (brackets: relevant candidate sites form reference)
			• SAM setting will be enhanced through the development of the site **Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified (Orange)** • SAM within 500m but visually separated from site **In conflict with the criterion (Red)** • SAM within site- likely negative effects • Setting likely to be affected
			Will the site negatively affect a Registered Park or Garden? (proximity: 40m) **In conformity with the criterion (Green)** • No- previously developed site **In conflict with the criterion (Red)** • Yes
Economic			
21	To enable high and stable levels of local employment in Newport	Will it increase employment overall?	**Is the site proposed for employment or mixed use with employment included?** **In conformity with the criterion (Green)** • Yes **Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified (Orange)** • Mixed use residential led • Mixed use tourism led **In conflict with the criterion (Red)** • Score negative if site will lead to a loss of employment land to another use **N/A** • Unlikely to have a negative effect but not employment site
23	To enhance the profile of	Will the development of	**Is the site designated for tourism use?** **In conformity with the criterion (Green)**

No	SA Objective	Decision Aiding Question	Detailed Criteria (brackets: relevant candidate sites form reference)
	Newport, and strengthen the tourist economy, sensitively capitalising on environmental, heritage, and leisure assets	the site enhance the local tourism offer?	• Yes **Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified (Orange)** • Site is next to Roman settlement of Caerleon • Potential of site for enhancement of tourism may not be realised **In conflict with the criterion (Red)** • Score negative if site will lead to a loss of land of tourism importance or potential tourism importance to another use **N/A** • if unlikely to have a negative effect but not tourism site
			Will the site protect or enhance features which may have tourism value? **In conformity with the criterion (Green)** • Development on site could enhance tourist asset (s) **Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified (Orange)** • Potential for negative effects due to proximity **In conflict with the criterion (Red)** • Site adjacent to tourist potential area but for residential use **N/A** • No likely effect /previously developed site
26	Promote attractive and viable alternatives to car transport to achieve a modal shift to more sustainable modes of	Is the site close to public transport nodes or will it improve connectivity to public transport?	**Is the closest bus route within walking distance (800m)?** (4.2) **In conformity with the criterion (Green)** • Yes **Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified (Orange)** • Yes but services not frequent • Buses serving existing sites adjacent although distance unknown **In conflict with the criterion (Red)**

No	SA Objective	Decision Aiding Question	Detailed Criteria (brackets: relevant candidate sites form reference)
	transport, including walking and cycling		• No
			Is the nearest railway station within walking or cyclable distance? (800m or 2-5km) (4.4) **In conformity with the criterion (Green)** • Yes - walking **Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified (Orange)** • Yes- cycling **In conflict with the criterion (Red)** • No **N/A** • Site well served by bus routes (other public transport)
		Is the site close to or will it improve connectivity to walking and cycling routes?	**Will the site connect to the wider walking and cycling network?** (4.7) **In conformity with the criterion (Green)** • Yes • Site will create an increase in routes **Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified (Orange)** • To be dealt with as part of planning application process (site close to PROW) • Site layout will encourage walking and cycling – within site **In conflict with the criterion (Red)** • No
27	To seek to improve the vitality and viability of the City Centre	**Will it increase the range of employment opportunities, shops and services available in town**	**Is the site proposed for mixed use development including employment within the City Centre?** **In conformity with the criterion (Green)** • Yes **Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified (Orange)** • Site on outskirts of city

No	SA Objective	Decision Aiding Question	Detailed Criteria (brackets: relevant candidate sites form reference)
		centres?	• Site is mixed use, residential and/or education led **In conflict with the criterion (Red)** • No- development of site may draw attention away from city centre **N/A** • Unlikely to have a negative effect but not mixed use city centre

D.2 Results

D.2.1 **Table D.4** shows the results of the SA interpretation of the Newport Candidate Sites Assessment including the additional data collation recommended as a result of the comparison of the NCC methodology against SA criteria.

D.2.2 Overall, the results predict a number of positive as well as negative effects on the SA Objectives as a result of implementation of the LDP sites.

Conformity with the SA Criteria

D.2.3 In general, conformity with the criteria associated with following SA objectives is predicted for most of the sites:

- SA objective 12: Promote the reduction of waste generation and landfill, and increase levels of recycling to achieve more sustainable waste management;
- SA objective 16: Protect and provide improved local, social, recreational and leisure facilities for all sectors of the community, and improve access to them;
- SA objective 19:To conserve and enhance the historic environment of Newport;
- SA objective 26: Promote attractive and viable alternatives to car transport to achieve a modal shift to more sustainable modes of transport, including walking and cycling; and
- SA objective 27: To seek to improve the vitality and viability of the City Centre.

D.2.4 A number of the Strategic Sites were predicted to have no potential conflicts with any of the SA Criteria based on the data available. These are considered to be the most sustainable sites, subject to data gaps, and are listed below:

- Site 6: Whiteheads;
- Site 11: Pirelli; and
- Site 38: 28 Retail East.

D.2.5 All other strategic sites were predicted to have conflicts with at least one of the SA Objectives.

Predicted Conflicts with the SA Criteria

D.2.6 Conflicts were predicted to arise for the majority of the sites against the criteria associated with the following SA Objectives:

- SA objective 1: Protect and enhance existing valued landscapes and open spaces and encourage their sustainable use, enjoyment and management;
- SA objective 2: To protect, manage and enhance biodiversity;
- SA objective 3: To ensure efficient use of land and protect geodiversity, soil quality and mineral resources;
- SA objective 4: To improve air quality;
- SA objective 7: To maintain and, where possible, enhance water quality; and
- SA objective 14: Improve equality of opportunities amongst all social groups.

D.2.7 For the sites with a large number of predicted conflicts with the SA Objectives, de-allocation is recommended. These sites are detailed in the recommendations section of this chapter.

Predicted Conflicts with Biodiversity and Habitats Regulations

D.2.8 Some of the strategic sites proposed have been identified as being in conflict with the criteria associated with SA objective 2 (biodiversity) especially with regards to European, National as well as locally designated sites.

D.2.9 With regards to European sites, the HRA ISR (January 2010) identifies key cumulative vulnerabilities of the European and Ramsar sites, as well as those sites that may significantly contribute to any likely significant effects arising from the LDP. Those Candidate sites that are considered to potentially result in likely significant effects are:

- Llanwern;
- Celtic Manor;
- The Airport;
- Uskmouth;
- Solutia; and
- Glan Llyn.

D.2.10 The ISR identifies key issues that should be subject to further work with regards to Natura 2000 sites as outlined below. Although not summarised here, the ISR also includes an assessment of the potential effects on European sites located outside the NCC administrative area.

River Usk SAC

D.2.11 Those candidate sites located within proximity to the River Usk SAC have potential to negatively impact on the SAC's interest features through disturbance:

"Of particular concern are the Uskmouth candidate site [1] *and the Celtic Manor candidate site* [29], *both of which propose extensive future development which could result in a loss of terrestrial habitat and an increase in disturbance both of the fluvial and terrestrial habitats."*

D.2.12 It is considered that "*the current candidate sites combined with the wider plans for extensive development along the River Usk SAC will lead to a potential likely significant effect on the European site. Particular focus for any further work should be on:*

- *Disturbance;*
- *Diffuse pollution; and*
- *Water resources."*

River Severn

"Within the candidate sites register, of particular concern is the airport, which sits within the estuary itself, with associated proposed development through the Gwent Levels. Whilst it is acknowledged that this proposal is not supported by the City Council and the UK Government it should be recognised that such a development will have a significant effect on the SAC primarily through disturbance, physical loss and pollution.

Outside of the SAC boundary itself, there is potential for disturbance of habitats important to the birds for which the SAC is designated. Sites adjacent to the Gwent Levels, namely at Uskmouth, Solutia, and Llanwern, and to a lesser extent developments at Duffryn and Marshfield may cause disturbance on the wetland and agricultural habitats which provide high tide roost and grazing habitats for wading birds as well as ducks and geese species.

Particular focus for any further work should be on:

- *Physical loss through removal; and*
- *Disturbance of high tide roost/feeding habitats."*

Recommendations

D.2.13 Detailed recommendations to improve the sustainability performance for each site are provided in ***Table D.5.*** In summary, the appraisal has resulted in recommendations for modifications to site

boundaries, mitigation measures for implementation as well as recommendations for the de-allocation of sites.

D.2.14 Some candidate sites will intrinsically have negative effects that can be avoided if they were to be de-allocated and development reallocated in more sustainable locations. It is recommended that the following sites are not carried forward for inclusion in the preferred strategy, for reasons detailed in ***Table D.5:***

- Site 5: Solutia;
- Site 20: Michaelston;
- Site 21: Marshfield West;
- Site 22: Marshfield East; and
- Site 43: Airport.

D.2.15 Potential conflicts for other sites may be, to a certain degree, mitigated through the implementation of LDP policies that will seek to reduce the effects of development on environmental and socio-economic considerations.

D.2.16 Mitigation measures recommended for a number of the sites, as included in ***Table D.6*** relate to the need to minimise potential conflicts with the following designations and assets in the County Borough:

- PROWs;
- SSSIs, SINCs, SPAs, SACs;
- Flood Risk Areas;
- Land, air, water and noise pollution potential;
- Historic Landscape Character;
- Tree Preservation Orders or Protected Hedgerows;
- Archaeological Sensitive Areas;
- Potentially Contaminated Land;
- Listed Buildings and Conservation Areas;
- Public open space; and
- Potential tourism assets.

D.2.17 Mitigation and enhancement can take the form of various measures including:

- Modifying the site area to avoid the designation or vulnerable asset;
- Creating buffer zones;
- Providing compensatory or mitigating features as part of the development;
- Investigation and remediation/mitigation ahead of development (particularly in relation to potentially contaminated land/ archaeological assets);
- Sensitive design;
- Enhancing community integration through the provision of facilities and employment as part of the site development;
- Enhancement of public transport accessibility;
- Enabling tourism potential through the provision of tourism facilities on site; and

- Enhancing air, water, biodiversity and human health through the provision of green infrastructure.

Data Gaps

D.2.18 It should be noted that there are a number of notable information gaps in the site appraisal data gathered by the Council (indicated by the question marks in ***Table D.5***). Specific data that still need to be collated for a large number of the possible development sites (unless otherwise stated) are related to the following criteria:

NCC Criteria

- SA Objective 2: Does the site contain protected or important hedgerows? (3.13)
- SA Objective 3: Will it lead to the loss of best and most versatile agricultural land (grades 1, 2 and 3?) (3.11)
- SA objective 12: Does the site have adequate waste management facilities? (6.3)

Suggested Additional Criteria

- SA Objective 19:
  - Will the site negatively affect an area of ancient woodland?
  - Will the site negatively affect a Scheduled Ancient Monument? (proximity 40m)
  - Will the site affect a Registered Park or Garden? (proximity 40m)

D.3 Council Responses to the Strategic Site SA Recommendations

D.3.1 ***Table D.6*** shows the SA recommendations and how the NCC has taken these into account where sites have moved forward for allocation in the LDP. The table shows the relationship between the candidate sites and the allocated site numbers included within the LDP for direct cross-reference. NCC's responses to the recommendations have been taken into consideration in the assessments of the policies containing site allocations. Further information on the sites not assessed as candidate sites at an earlier stage has been provided by NCC to ensure that all allocated sites in the Deposit LDP have been assessed under the SA objectives with similar levels of available information.

Table D.4 - Site Assessment Results

Sites 1 - 23

SA Objective	Detailed Criteria (below)	Site Name (right)	1.Uskmouth/ Sloblands	2. Traston	3. Tredegar	4. St Cadocs	5. Solutia	6. Whiteheads	7. Royal Gwent	8. Rogerstone	9. Queenshill	10. Redwick	11. Pirelli	12. Petrepoeth	13. Pilton Vale	14. Penhow	15. Penrhos Farm	16. Peterstone	17. Ringland	18. Parc Seymour	19. Novelis	20. Michaelstone	21. Marshfield West	22. Marshfield East	23. Langstone South
1	Will the site enhance the quality of or lead to the increase of local valued landscapes? (3.12)																					?			
	Proximity to or affect on public rights of way (4.8)														?										
	Is the nearest area of usable open space within walking or cyclable distance? (4.9)																								
2	Is the site subject any environmental protection designations (e.g. SSSI)? (or within 2km proximity) (3.7)																								
	Is it likely that there are any protected species on or near the site? (3.8)									x															
	Does the site contain protected or important mature trees? (3.13)																	?							
	Does the site contain protected or important hedgerows? (3.13)				?		?	?										?							
	Will it protect, maintain or enhance green spaces or																								

SA Objective	Detailed Criteria (below)	Site Name (right)	1.Uskmouth/ Sloblands	2. Traston	3. Tredegar	4. St Cadocs	5. Solutia	6. Whiteheads	7. Royal Gwent	8. Rogerstone	9. Queenshill	10. Redwick	11. Pirelli	12. Petrepoeth	13. Pilton Vale	14. Penhow	15. Penrhos Farm	16. Peterstone	17. Ringland	18. Parc Seymour	19. Novelis	20. Michaelstone	21. Marshfield West	22. Marshfield East	23. Langstone South
	corridors important for ecological connectivity? (3.15)																								
3	Is the site previously developed land? (3.1)																	?							
	Is the site greenfield? (3.2)																	?							
	Will it lead to the loss of best and most versatile agricultural land (grades 1, 2 and 3?) (3.11)															?		?		?			?		
	Is the site in a potential minerals safeguarding zone? (3.10)																								
	Will it lead to the remediation of contaminated land? (3.3)		?	?														?							
4	Will the proposed use increase air pollution (from traffic or industrial processes)? (6.2)							?																	
	Is the site within an AQMA?																								
6	Is the site to include a noisy land use next to a sensitive land use? (6.2)							?																	
7	Is the site adjacent to a watercourse? (3.5)																								
	Does the site have adequate water and sewerage												?							?					

SA Objective	Detailed Criteria (below)	Site Name (right)	1.Uskmouth/ Sloblands	2. Traston	3. Tredegar	4. St Cadocs	5. Solutia	6. Whiteheads	7. Royal Gwent	8. Rogerstone	9. Queenshill	10. Redwick	11. Pirelli	12. Petrepoeth	13. Pilton Vale	14. Penhow	15. Penrhos Farm	16. Peterstone	17. Ringland	18. Parc Seymour	19. Novelis	20. Michaelstone	21. Marshfield West	22. Marshfield East	23. Langstone South
	infrastructure? (6.3)																								
9	Does the site lie within the development advice zone (TAN15) and have a non compatible use? (3.4)																								
12	Does the site have adequate waste management facilities? (6.3)											?	?							?					
14	Will the site be located near or within a ward within the 100 most deprived in the country?																								
16	Will the development lead to a loss of community facilities?(5.4)																								
	Is the local convenience shop within walking or cycling distance? (see Table 7.1) (4.5)		?				?																		
	Is the range of shopping facilities available likely to be adequate? (see Table 7.1) (4.5)		?				?								?										
	Are key local services within walking or cycling distance? (see Table 7.1)		?				?																	?	
	Are employment opportunities within walking or cycling distance? (see Table 3.4) or																							?	

SA Objective	Detailed Criteria (below)	Site Name (right)	1.Uskmouth/ Sloblands	2. Traston	3. Tredegar	4. St Cadocs	5. Solutia	6. Whiteheads	7. Royal Gwent	8. Rogerstone	9. Queenshill	10. Redwick	11. Pirelli	12. Petrepoeth	13. Pilton Vale	14. Penhow	15. Penrhos Farm	16. Peterstone	17. Ringland	18. Parc Seymour	19. Novelis	20. Michaelstone	21. Marshfield West	22. Marshfield East	23. Langstone South
	within 30 mins travel by public transport? (4.6)																								
	Are educational opportunities within walking or cycling distance? (see Table 3.4) or within 30 mins travel by public transport? (5.1)																								
19	Will the site negatively affect a Conservation Area? (3.9)																								
	Will the site negatively affect any listed buildings on or adjacent to the site? (3.9)																								
	Will the site negatively affect an Area of Archaeological Importance or potential archaeological site? (proximity: 40m) (3.16)																								
	Will the site negatively affect the Gwent Levels?																								
	Will the site negatively affect an area of ancient woodland?			?	?	?	?			?						?				?			?	?	?
	Will the site negatively affect a Scheduled Ancient Monument? (proximity: 40m)			?		?	?		?	?	?	?	?					?		?					
	Will the site negatively affect a Registered Park or Garden? (proximity: 40m)									?										?					

SA Objective	Detailed Criteria (below)	Site Name (right)	1.Uskmouth/ Sloblands	2. Traston	3. Tredegar	4. St Cadocs	5. Solutia	6. Whiteheads	7. Royal Gwent	8. Rogerstone	9. Queenshill	10. Redwick	11. Pirelli	12. Petrepoeth	13. Pilton Vale	14. Penhow	15. Penrhos Farm	16. Peterstone	17. Ringland	18. Parc Seymour	19. Novelis	20. Michaelstone	21. Marshfield West	22. Marshfield East	23. Langstone South
21	Is the site proposed for employment or mixed use with employment included?																								
23	Is the site designated for tourism use?																								
	Will the site protect or enhance features which may have tourism value?																								
26	Is the closest bus route within walking distance (800m)? (4.2)																								
	Is the nearest railway station within walking or cyclable distance? (800m or 2-5km) (4.4)																								
	Will the site connect to the wider walking and cycling network? (4.7)																								
27	Is the site proposed for mixed use development including employment within the City Centre?																								

Sites 24-46

SA Objective	Detailed Criteria (below) / Site Name	24. Langstone North	25. Herbert Road	26. Llanwern	27. Malpas	28. Duffryn	29. Celtic Manor	30. Coldra	31. Allt yr Yn	32. Bassaleg	33. Castleton	34. Bettws	35. Broadway	36. Caerleon North	37. Carcraft	38. 28 Retail East	39. Eastern Expansion Area	40. Coleg Gwent	41. Glan Llyn	42. Gloch Wen	43. Airport	44. adj Hartridge	45. Crindau	46. DIY
1	Will the site enhance the quality of or lead to the increase of local valued landscapes? (3.12)																							
	Proximity to or affect on public rights of way (4.8)																							
	Is the nearest area of usable open space within walking or cyclable distance? (4.9)					?																		
2	Is the site subject any environmental protection designations (e.g. SSSI)? (or within 2km proximity) (3.7)																							
	Is it likely that there are any protected species on or near the site? (3.8)																							
	Does the site contain protected or important mature trees? (3.13)																							
	Does the site contain protected or important hedgerows? (3.13)				?			?													?	?	?	
	Will it protect, maintain or enhance green spaces or																							

SA Objective	Detailed Criteria (below) / Site Name	24. Langstone North	25. Herbert Road	26. Llanwern	27. Malpas	28. Duffryn	29. Celtic Manor	30. Coldra	31. Allt yr Yn	32. Bassaleg	33. Castleton	34. Bettws	35. Broadway	36. Caerleon North	37. Carcraft	38. 28 Retail East	39. Eastern Expansion Area	40. Coleg Gwent	41. Glan Llyn	42. Gloch Wen	43. Airport	44. adj Hartridge	45. Crindau	46. DIY
	corridors important for ecological connectivity? (3.15)																							
3	Is the site previously developed land? (3.1)																							
	Is the site greenfield? (3.2)																							
	Will it lead to the loss of best and most versatile agricultural land (grades 1, 2 and 3?) (3.11)							?					?											
	Is the site in a potential minerals safeguarding zone? (3.10)																							
	Will it lead to the remediation of contaminated land? (3.3)						?																	
4	Will the proposed use increase air pollution (from traffic or industrial processes)? (6.2)																							
	Is the site within an AQMA?																							
6	Is the site to include a noisy land use next to a sensitive land use? (6.2)																							
7	Is the site adjacent to a watercourse? (3.5)																							

SA Objective	Detailed Criteria (below) / Site Name	24. Langstone North	25. Herbert Road	26. Llanwern	27. Malpas	28. Duffryn	29. Celtic Manor	30. Coldra	31. Allt yr Yn	32. Bassaleg	33. Castleton	34. Bettws	35. Broadway	36. Caerleon North	37. Carcraft	38. 28 Retail East	39. Eastern Expansion Area	40. Coleg Gwent	41. Glan Llyn	42. Gloch Wen	43. Airport	44. adj Hartridge	45. Crindau	46. DIY
	Does the site have adequate water and sewerage infrastructure? (6.3)		?																					
9	Does the site lie within the development advice zone (TAN15) and have a non compatible use? (3.4)												?											
12	Does the site have adequate waste management facilities? (6.3)	?	?		?		?				?											?	?	
14	Will the site be located near or within a ward within the 100 most deprived in the country?																							
16	Will the development lead to a loss of community facilities? (5.4)																				?			
	Is the local convenience shop within walking or cycling distance? (see Table 7.1) (4.5)																							
	Is the range of shopping facilities available likely to be adequate? (see Table 7.1) (4.5)								?															
	Are key local services within walking or cycling distance?																							

SA Objective	Detailed Criteria (below) / Site Name	24. Langstone North	25. Herbert Road	26. Llanwern	27. Malpas	28. Duffryn	29. Celtic Manor	30. Coldra	31. Allt yr Yn	32. Bassaleg	33. Castleton	34. Bettws	35. Broadway	36. Caerleon North	37. Carcraft	38. 28 Retail East	39. Eastern Expansion Area	40. Coleg Gwent	41. Glan Llyn	42. Gloch Wen	43. Airport	44. adj Hartridge	45. Crindau	46. DIY
	(see Table 7.1)																							
	Are employment opportunities within walking or cycling distance? (see Table 7.1) or within 30 mins travel by public transport? (4.6)											?												
	Are educational opportunities within walking or cycling distance? (see Table 3.4) or within 30 mins travel by public transport? (5.1)							?																
19	Will the site negatively affect a Conservation Area? (3.9)																							
	Will the site negatively affect any listed buildings on or adjacent to the site? (3.9)																							
	Will the site negatively affect an Area of Archaeological Importance or potential archaeological site? (proximity: 40m) (3.16)																							
	Will the site negatively affect the Gwent Levels?																							
	Will the site negatively affect an area of ancient woodland?			?		?		?	?			?		?			?			?	?	?	?	

SA Objective	Detailed Criteria (below) / Site Name	24. Langstone North	25. Herbert Road	26. Llanwern	27. Malpas	28. Duffryn	29. Celtic Manor	30. Coldra	31. Allt yr Yn	32. Bassaleg	33. Castleton	34. Bettws	35. Broadway	36. Caerleon North	37. Carcraft	38. 28 Retail East	39. Eastern Expansion Area	40. Coleg Gwent	41. Glan Llyn	42. Gloch Wen	43. Airport	44. adj Hartridge	45. Crindau	46. DIY
	Will the site negatively affect a Scheduled Ancient Monument? (proximity: 40m)					?	?					?	?						?		?	?	?	
	Will the site negatively affect a Registered Park or Garden? (proximity: 40m)			?		?		?	?								?			?	?	?	?	
21	Is the site proposed for employment or mixed use with employment included?																					?		
23	Is the site designated for tourism use?																							
	Will the site protect or enhance features which may have tourism value?											?												
26	Is the closest bus route within walking distance (800m)? (4.2)																					?		
	Is the nearest railway station within walking or cyclable distance? (800m or 2-5km) (4.4)																					?		
	Will the site connect to the wider walking and cycling network? (4.7)																			?		?		
27	Is the site proposed for mixed use development including																							

SA Objective	Detailed Criteria (below)	Site Name	24. Langstone North	25. Herbert Road	26. Llanwern	27. Malpas	28. Duffryn	29. Celtic Manor	30. Coldra	31. Allt yr Yn	32. Bassaleg	33. Castleton	34. Bettws	35. Broadway	36. Caerleon North	37. Carcraft	38. 28 Retail East	39. Eastern Expansion Area	40. Coleg Gwent	41. Glan Llyn	42. Gloch Wen	43. Airport	44. adj Hartridge	45. Crindau	46. DIY
	employment within the City Centre?																								

Table D.5 - Recommendations by Site

	Site name	**Notes/ Recommendations** (Note: recommendations made in February 2012, assessments updated Dec 2012 with further environmental information. Further environmental information for designated sites included within Appendix G policy assessments)
1.	**Uskmouth/ Sloblands**	• PROW 401 at Sloblands site: effect should be minimised through avoiding PROW or ensuring their retention/no negative effects. • 1673.C1 Sloblands is 0.23km from a SAC designation (River Usk). 9.24% of the site is within the SSSI Gwent levels -Nash and Goldcliff, Council Alpha Steel and Solutia Site. 75.22% of the site is within the SINC (Solutia site) designation - recommend site boundary be redrawn to be at least 2km away from SAC and SSSI, or appropriate potential for mitigation proved. • 1674.C1 Uskmouth Power Station is within a number of designations. Approximately 8.2% of the site is within a SSSI and SAC, AND 4.29% is within a SPA designation. The designations affected are the Severn Estuary SSSI/SAC/SPA/Ramsar designation and SSSI/SAC (River Usk). 5.1% of the site is also within the Gwent Wetland Reserve SINC. • TAN 15 DAMs will shortly be updated and will clarify the position- it is suggested that this site allocation be reviewed upon publication of TAN15 updates. • Convenience shop has been deemed 'not applicable'. It is recommended that this is re-visited as local facilities will be required for staff at employment sites/part of the mix of uses could potentially include convenient retail if required. • Directly adjacent to the Nash/Goldcliff coastal zone historic landscape character area of the Gwent Levels - likely to have a negative effect on the landscape character - site is characterised including abundant archaeological remains, which may be affected negatively by development adjacent.
2.	**Traston**	• Site on the fringe of the SSSI and SAC designation (River Usk) (0.9km) and 99.71% of the site is within a SINC (Solutia). May contain protected species- suggest any potential effects are mitigated through measures such as a buffer zone to prevent access and reduce effects. It should be ensured that the biodiversity value of the site is enhanced. • TPO 06/2006 mixed deciduous woodland- should be maintained through modification to allocation or through designation

	Site name	Notes/ Recommendations (Note: recommendations made in February 2012, assessments updated Dec 2012 with further environmental information. Further environmental information for designated sites included within Appendix G policy assessments)
		requirements. • Contaminated land risk should be investigated and remediated prior to development on site. • It should be ensured that the archaeology of the site (sensitive) is not negatively affected by any development proposals. • Directly adjacent to the Nash/Goldcliff coastal zone historic landscape character area of the Gwent Levels- likely to have a negative effect on the landscape character- site is characterised including abundant archaeological remains, which may be affected negatively by development adjacent. Recommend that potential effects are investigated and mitigated prior to commencement of development where possible.
3.	**Tredegar**	• It should be ensured that potential for protected species is investigated and mitigated where possible before development is permitted. 5.35% of the Tredegar Park Golf Course (28.C1) is within a SINC designation. The Gwent Levels -St Brides SSSI designation is within 2km of all three of the sites that comprise the strategic site. • The area of woodland TPO (mixed deciduous) should be retained and linkages to the wider ecological system maintained. • It is recommended that development leads to the enhancement of green infrastructure, and as such, this should be designed into the allocation. • Any potential contamination on the previously developed portion of the site should be investigated and remediated where necessary ahead of development. • If development is to proceed it should be proved ahead of development that no negative effects on the watercourse will arise as a result. • Site is sensitive development in a known flood risk area. Subject to the revisions to TAN 15, it should be ensured that development will not increase the risk of flooding to people or property subject to advice from the EA. • Site contains a listed building: It is recommended that the setting and value of the listed building are enhanced through the development of the site.
4.	**St Cadocs**	• The representation for 155.C1 acknowledges the need for archaeological investigation works and avoidance of the area designated as flood zone C. • Both the sites within the strategic site are within 2km of designated sites for nature conservation importance. It should be ensured that potential for protected species is investigated and mitigated where possible before development is permitted for 155.C1. • It should be ensured that all TPOs and mature trees are retained on site 155.C1. • The potential for the delivery of tourism facilities as part of the mix of uses, to enhance the attraction of the Roman settlement could be explored on site 155.C1. • The representation for 1525.C2 acknowledges that the North Eastern corner of the site could not be developed as an archaeological survey has highlighted roman remains. • An FRA would be required as 1525.C2 is adjacent to a C2 Flood Risk Area.

	Site name	**Notes/ Recommendations** (Note: recommendations made in February 2012, assessments updated Dec 2012 with further environmental information. Further environmental information for designated sites included within Appendix G policy assessments)
5.	**Solutia**	It is recommended that both of the sites within this strategic site are **not carried forward** as part of the preferred development strategy for the following reasons: • 96.01% of the Solutia Fields (169.C1) part of the strategic site contains is within the Solutia Site SINC (the Queensway Meadows (232.C3) site is 0.02km from the site); • 58.48% of the Queensway Meadows (232.C3) site is within the Gwent Levels - Nash and Goldcliff SSSI designation; • Both sites are close to a SAC and SPA (169.C1 Solutia Fields: 0.66km; 232.C3 Queensway Meadows: 1.31km); and 169.C1 is also close to the Gwent Levels - Nash and Goldcliff SSSI designation (0.002km) • No designated open space for recreation- likely to lead to negative effects, from use of countryside areas for recreation, on designated sites for nature conservation; • Site contains a listed building: It is recommended that the setting and value of the listed building are enhanced through the development of the site loss of 141ha green space including some valuable agricultural land; • Increased potential for pollution to land, air, water and noise; • Flood risk area (C1); and • Directly adjacent to the Nash/Goldcliff coastal zone historic landscape character area of the Gwent Levels- likely to have a negative effect on the landscape character- site is characterised including abundant archaeological remains, which may be affected negatively by development adjacent.
6.	**Whiteheads**	• Mix of uses unknown- should be employment led to balance with the provision of housing on 198.C1; potential effects such as increased traffic levels and noise pollution should be mitigated through the design process. • It is recommended that the potential negative effects on biodiversity are investigated and mitigated prior to the commencement of development as part of a wider scheme to mitigate the potential of the development of the LDP on sites designated for nature conservation interests. The sites are both within proximity of nature conservation designations (less than 1km), although none are directly adjacent.
7.	**Royal Gwent**	• It should be ensured that walking and cycling facilities are created and integrated into the surrounding area to reduce the need to travel by private car to services and facilities including employment. • Both of the sites within the strategic site are within 1km of the River Usk SAC and SSSI. • As the site is next to Conservation Areas, the tourism potential of the site should be explored- facilities provided should seek to address any potential. • Although not in a flood zone, and increase in hard surfacing should ensure that net surface water runoff is unchanged. • It should be ensured that the potential for the creation of green infrastructure is realised. • Mitigation measures to prevent negative effects on the archaeologically sensitive area designation should be investigated and implantation ensured ahead of development.

	Site name	**Notes/ Recommendations** (Note: recommendations made in February 2012, assessments updated Dec 2012 with further environmental information. Further environmental information for designated sites included within Appendix G policy assessments)

8.	**Rogerstone**	• The design of development needs to include measures to protect and enhance ecological connectivity. Trees/Hedgerows on site should be retained where deemed beneficial for the enhancement or maintenance of biodiversity and green infrastructure.
		• The strategic site is adjacent to or contains parts of the following SINC designations:
		  • Oaktree Cottage Fields SINC (2073.C1 Risca Road (1) - 97.11% within SINC and 2073.C2 Risca Road (2) - 96.1% within SINC),
		  • Monmouthshire B Canals (Crumlin Arm) SINC (0.03km from 321.C1 Cwrt camlas);
		  • Newport Environmental Space (Policy CE33);
		  • Cefn Council Wood (East + West) SINC (53.C1 Bethsda Field and 1232.C2 Bethsda Close are both 0.04% within the SINC).
		• There is the potential for otters to be present at this site. It should be ensured that potential for protected species is investigated and mitigated where possible before development is permitted.
		• The design of development should seek to enhance the setting of the Conservation Area. This could include the enhancement of the canal as a tourism attraction and the inclusion of tourist accommodation in the designations. This will also include the avoidance of any pollution to the watercourse.
		• It is recommended that there is no loss to community facilities, notably the allotments under site 1232.C1 and 53.C1. This part of the site should be retained as allotments.
		• The development of the settlement should seek to ensure that there is an appropriate range of local services and facilities within walking distance from residences, including health facilities.
		• It should be ensured that the development of the sites incorporates walking and cycling routes to connect to the national cycle network as well as to services and facilities including employment and education.

9.	**Queenshill**	• Trees/Hedgerows on site should be retained where deemed beneficial for the enhancement or maintenance of biodiversity and green infrastructure. • Potential loss of school playing fields- compensatory provision should be provided. • The site is less than 1km from the River Usk SSSI and SAC.
10.	**Redwick**	• Within Gwent Levels Redwick and Llandevenny SSSI (1425.C1 is 99.96% within the designation and 1633.C1 is 100% within the designation), close to Severn Estuary SPA/SAC/Ramsar (within 1km) • Gwent Levels (Redwick/Magor/Undy: Redwick/Magwyr/Gwndy character area “Irregular field pattern of small fields (includes some regular areas), drainage features (reens, surface drainage) include major medieval reens, seawall includes relict sea wall (SAM)”): development unlikely to have direct effect in itself but any potential cumulative effects to be mitigated through LDP policies. • Flood Zone C1: mitigation should be included where possible. Bungalow style dwelling may not be appropriate as ground floor sleeping accommodation increases the risk from flooding. • The design of any development must take into account the environmental and historical designations of the site, ensuring no negative effects occur.

	Site name	**Notes/ Recommendations** (Note: recommendations made in February 2012, assessments updated Dec 2012 with further environmental information. Further environmental information for designated sites included within Appendix G policy assessments)
		• The sewerage infrastructure of the site should ensure that the potential for pollution to water resources is minimised.
11.	**Pirelli**	• It is recommended that the mix of uses on site include some convenience retail as well as services and facilities to serve the new and existing population subject to needs assessment. • Site is within 1km of the River Usk SSSI and SAC.
12.	**Petrepoeth**	• May affect a SINC designated site (33.21% of 1525.C6 Court Crescent is within the Court Wood SINC; 22.09% of 1666.C1 The Griffin (1) is within the SINC and 9.67% of 1666.C2 The Griffin (2) is within the SINC): potential effects should be investigated and mitigated prior to development on site. • Public rights of way as well as additional walking and cycling routes (including safe routes to school) should be developed through the design process. • Development should be located away from the watercourse as part of the river walkway scheme to reduce potential pollution to water resources. • It is recommended that local convenience stores are provided as part of the mix of uses to reduce the need to travel.
13.	**Pilton Vale**	• It should be ensured that any important landscape features such as trees or hedgerows are retained. • Any potential contamination of land or effect on watercourses should be minimised. • The site is less than 2km from the River Usk SSSI and SAC. 1.04% of the site is within the Pilton Vale Brook SINC - potential effects should be investigated and mitigated prior to development on site.
14.	**Penhow**	• The protection of land for amenity space (2059.C1) is supported in sustainability terms. The assessment in ***Table D.4*** is based on candidate site 2074.C1. • The site is less than 1km from the Penhow Woodlands SSSI and Rock Wood SINC. • It should be ensured that development seeks to minimise its effect on landscape quality and PROWs. This could be achieved through the implementation of extensive green infrastructure. As part of this, existing trees and hedges should be retained. • It should be ensured that the setting of the listed building is not affected by development. • It is recommended that the development of the site includes a convenience store due to its relatively remote location. • Improvements to public transport and walking and cycling routes should be ensured ahead of development being permitted.
15.	**Penrhos Farm**	• Part of site appears to be within Flood Zone C2- it should be ensured that the development of the site does not increase the risk of or from flooding. • Site contains a listed building: proposals should seek to enhance this asset. • Less than 1km from River Usk SAC and SSSI. 12.46% of the site is within the Afon Llwyd SINC: any potential effects should be investigated and mitigated prior to development on site (see HRA also). • Any potential contamination of land or effect on watercourses should be minimised.

	Site name	**Notes/ Recommendations** (Note: recommendations made in February 2012, assessments updated Dec 2012 with further environmental information. Further environmental information for designated sites included within Appendix G policy assessments)
		• The site could seek to provide additional public transport provision to ensure that visitors are able to access the site sustainably and easily.
16.	**Peterstone**	• Minor development (2 x residential). • Unclear whether brownfield or greenfield (contradictions in site form see 2.5, 3.1, 3.2) – potential flood risk issues. • Less than 1km from Severn Estuary SAC, SPA and RAMSAR. 93.024% of the site is within the Gwent Levels - Rumney and Peterstone SSSI: mitigation should be employed to avoid any potential negative effects. • No designated open space for recreation- likely to lead to negative effects, from use of countryside areas for recreation, on designated sites for nature conservation. • Archaeologically sensitive area: any potential effects should be investigated and mitigated prior to development onsite. • Within the Peterstone: Llanbedr historic landscape characterisation area which may be affected by further development as the designation is *"characterised by trapezoidal blocks of very long, very narrow fields"* : the design of development should seek to ensure that the value of the landscape character is not negative affected.
17.	**Ringland**	• It should be ensured that the open space and leisure designations seek to enhance the Ringland Wood SINC on site. 52.36% of the site is within the SINC designation.
18.	**Parc Seymour**	• The proportion of housing to open space should seek to ensure the retention of local character and ecological value. This is especially the case for site 1341.C1 which includes a SINC designation (Seymour Avenue Field) (14.63% of the site is SINC) and SSSI designation (0.006% of the site is within the Parc Seymour Woods SSSI) - it is recommended that the SINC is retained as open space, and a buffer is created between development and the SINC, as well as between development and the SSSI to the north. The other sites within this strategic site are also within proximity to the environmental designations, although these site allocations are for open space/recreation. • PROWs, TPOs and protected hedgerows should be enhanced throughout the sites. • The provision of housing should include a convenience store on at least one of the sites. • It is recommended that walking and cycling routes to key services and facilities including employment are enhanced as part of development proposals. Enhanced bus provision should also be considered to reduce the potential effect of traffic growth.
19.	**Novelis**	• It is recommended that the site be developed for a mix of uses, to include residential and employment. • Adjacent to watercourse and SINC (Afon Ebbw River, 0.002km) plus includes area of Ancient Woodland: any potential effects should be mitigated- it is recommended that a network of ecological corridors is integrated into the design of the site. • The site is brownfield, being the site of a former aluminium factory. • The site is also in a flood risk area.
20.	**Michael-stone**	It is recommended that the site **does not go forward** as part of the preferred development strategy for the following reasons: • SINC designation (30.16% of the site is within the Yew Tree Cottage South SINC) - recommend don't develop if effect cannot be

	Site name	Notes/ Recommendations (Note: recommendations made in February 2012, assessments updated Dec 2012 with further environmental information. Further environmental information for designated sites included within Appendix G policy assessments)
		mitigated (exact location to be confirmed- designated area to be avoided); • May affect setting of listed building; • Landscape effect unclear as comment on form is ambiguous; • Greenfield and loss of agricultural land; and • Poor public transport.
21.	**Marshfield West**	It is recommended that the sites within the strategic site **do not go forward** as part of the preferred development strategy for the following reasons: • Flood Zone C1; • May affect SPA; RAMSAR; • Part of site is within SSSI (70.984% of 302.C1 and 9.363% of 2061.C1 are within the Gwent Levels - Rumney and Peterstone SSSI); adjacent to SSSI/SINC (Marshfield Road SINC 0.05km and Gwent Levels - Rumney and Peterstone 0.02km from 1667.C1); • Likely to lead to significant increase in traffic dependent on volume of residential provision proposed- recommend development only be permitted if can be proven that public transport can be improved to increased frequency to centres of employment and the railway station; • Within Archeologically Sensitive Area and Gwent Levels Historic Landscape Characterisation Area Trowbridge: Trowbridge: *"a very remote area of landscape)*- development likely to significantly affect the character of the area as would be a large increase in existing settlement size (especially cumulatively with Marshfield East allocation); and • Increased pollution from traffic (air and noise).
22.	**Marshfield East**	It is recommended that the all of the sites within the strategic site **do not go forward** as part of the preferred development strategy for the following reasons: • Adjacent to an Archeologically Sensitive Area and within Gwent Levels Historic Landscape Characterisation Area Trowbridge: Trowbridge: *"a very remote area of landscape"*- development likely to significantly affect the character of the area as would be a large increase in existing settlement size (especially cumulatively with Marshfield West allocation); • Bordered by SSSI (Gwent Levels - St Brides 68.449% of 2050.C1 Church Farm (large site) is within SSSI and 0.02km from 2050.C2 Church Farm (small site); 1525.C3 is 0.2km from the SSSI); • No designated open space for recreation- likely to lead to negative effects, from use of countryside areas for recreation, on designated sites for nature conservation; • Flood Zone C1; • May affect SAC (site is less than 1km away); • Would lead to loss of agricultural land and therefore employment in rural area- suggest site should include a mix of uses to include employment;

	Site name	**Notes/ Recommendations** (Note: recommendations made in February 2012, assessments updated Dec 2012 with further environmental information. Further environmental information for designated sites included within Appendix G policy assessments)
		• Likely to lead to significant increase in traffic dependent on volume of residential provision proposed- recommend development only be permitted if can be proven that public transport can be improved to increased frequency to centres of employment and the railway station; • Increased pollution from traffic (air and noise); and • No open space designated for recreation nearby.
23.	**Langstone South**	• C2 in part of site: it is recommended that this part of the site is not developed and that green infrastructure is provided within the site to include SUDS. • SINC designated areas (0.02% of 1400.C1 and 0.02% of 1400.C2 are within the Delbury Grasslands SINC); 0.079% of 1400.C1 and 0.091% of 1400.C2 are within the Langston-Llanmartin Meadows SSSI: buffer areas should be created and mitigation implemented to avoid potential harm to these sites. • Primary facilities community hall and open space (including 'various community facilities' unspecified) to be provided as part of development- suggest some employment is also provided as part of the development (this could be in the form of live/work units). • Scheduled Ancient Monument; borders ASA: buffer areas free from development should be created if appropriate to retain the integrity and value of archaeological assets. • May harm potential of tourism assets including historic and environmental features: it should be ensured that the potential of the area of tourism development is investigated and realised onsite.
24.	**Langstone North**	• Mixed use scheme on one portion of site- mix of uses should include a new village centre to include convenience shopping, health centre, post office, and educational facilities. Further investment in well off areas may increase inequalities across the plan area: It should be ensured that the benefits of the scheme are realised for the entire community through sustainable accessibility provision. It is recommended that the site be developed to link and promote accessibility by walking and cycling, including connection to wider routes, connecting the area to the city. • Development would lead to an increase in traffic and subsequent air and noise pollution. Potential noise pollution from A48 adjacent to site: these effects should be mitigated as part of any development which may include the use of vegetative buffers. • Although not in a high flood risk zone, it is recommended that the development include SUDS to ensure that there is no net increase in surface water runoff, to reduce the risk of an increase in flooding.
25.	**Herbert Road**	• May help to improve city centre investment within the ward of St Julians: this effect should be ensured through design measures to improve accessibility and legibility. It should be ensured that clear, safe and direct walking and cycling routes are provided to connect the site to the city centre, as well as to recreational areas. • Flood zone C1: SUDS should be incorporated throughout the site. • Adjacent to watercourse: the River Usk SSSI and SAC is 0.05km from both sites within this strategic site: any potential effects should be mitigated prior to development to ensure no negative effects. Development on the site should seek to connect to and enhance the

	Site name	Notes/ Recommendations (Note: recommendations made in February 2012, assessments updated Dec 2012 with further environmental information. Further environmental information for designated sites included within Appendix G policy assessments)
		ecological value of the area, integrating with the river corridor. • Site could enhance landscape appearance next to river – it should be ensured that the design of development is sympathetic to the local environment.
26.	**Llanwern**	• It is recommended that only the land that is previously developed is reused for the development proposals. • SINCs - Elver Pill Reen Grassland and Pond (2.27% of 1420.C1 is within the SINC). Development on the site should seek to connect to and enhance the ecological value of the area. It is recommended that any development likely to harm the environmental designations or protected species should not be permitted. There are two other SINC designations within 1km of the other two sites in the strategic site which should also be considered. • SSSI - Gwent Levels - Redwick and Llandevenny (29.163% of 1420.C1 Llanwern Steelworks is within the SSSI and 100% of 1669.C1 South of Europark is within the SSSI; 0.13km from 329.C1 Quay Point, Magor). Development should seek to enhance the landscape character of the area and protect its biodiversity value. • Water quality should be maintained. • Development should ensure ease of access by public transport. • The mix of uses should ensure that a full range of community facilities is provided as part of development. • Proposals for energy from waste should seek to minimise air pollution. • Within The Levels ASA and within close proximity to Wilcrick Hill Fort Schedule Ancient Monument: it is recommended that development is not permitted where it may negatively affect the ASA, SAM, or Gwent Levels designations.
27.	**Malpas**	• Any public rights of way should be maintained and enhanced through development of the sites. • One of the sites is a SINC (70.43% of the 2076.C1 site) (Sneyd Park Wood - 2076.C1); Monmouthshire-Brecon Canal (Main Arm) SINC - 0.03% of 1525.C1 and 9.01% of 1525.C7 are within the SINC; TPOs on sites: Development on the site should seek to connect to and enhance the ecological value of the area. The River Usk SAC/SSSI is less that 2km from the sites. It is recommended that any development likely to harm the environmental designations or protected species should not be permitted. • Listed buildings likely to be affected (setting): the design of development should ensure that this effect is not negative. • Monmouthshire and Brecon Canal Conservation Area adjacent- walking and cycling routes to benefit from this asset should be enhanced. Any potential for the development of employment uses for the tourism industry should be encouraged (this should be explored prior to development for residential use to ensure that any potential isn't lost).
28.	**Duffryn**	• 55.943% of 140.C1; 100% of 1525.C5; and 5.23% of 232.C1 are within the Gwent Levels - St Brides SSSI. The final site in the strategic site, 2053.c1 is 0.6km from the designation. It is recommended that any development likely to harm the environmental designations or protected species should not be permitted. 60.86% of 1664.C1 is within a SINC designation. • It is recommended that only the previously developed sites are considered for development. Development in the ASA should be avoided where possible.

	Site name	**Notes/ Recommendations** (Note: recommendations made in February 2012, assessments updated Dec 2012 with further environmental information. Further environmental information for designated sites included within Appendix G policy assessments)
		• Public open space should be provided as part of development, especially where development includes residential provision or employment. • It should be ensured that there will be no net increase in surface water runoff as a result of development to reduce the increased risk of flooding through the development of the greenfield site, especially where this may include sensitive uses such as residential accommodation. • It should be ensured that the mix of uses provided on site cover the full range of community services and facilities required within walking distance including those in Table 3.4.
29.	**Celtic Manor**	• 7.259% of the site is within the River Usk SSSI; 7.01% of the site is within the River Usk SAC and 14% of the site is within the Afon Llwyd SINC. The following European Protected Species may be present: dormice, bats and otters. It is recommended that any development likely to harm the environmental designations or protected species should not be permitted. • 5 listed buildings on site- the proposed development cites the relocation of 1. It is recommended that this does not occur, and development ensures no negative effects to its setting or fabric. • ASA: any potential effects on the archaeological sites should be investigated and mitigated prior to development. • Connections to access the site by walking and cycling should be ensured. As part of this, the PROW throughout the site should be enhanced to ensure that the facility is accessible for recreational use for all members of the community. • Potential for enhancement of biodiversity, air, water and noise quality should be enhanced throughout the site. • Traffic increases that may result from the development of the site should be reduced through the introduction of an extensive travel plan that includes the provision of direct public transport to the site that is appealing to all members of the community including those who are members of the golf club.
30.	**Coldra**	• Landscape mitigation required- retention of woodland incorporated into development. • SAC/SSSI designations within 2km (River Usk). Coldra Wood SINC 0.08km away. • Should be ensured that walking and cycling routes are fully integrated as part of the site design.
31.	**Allt yr Yn**	• SINC designation (37.94% of the site is within the Allt yr Yn SINC): likely that habitats and species will be negatively affected. Mitigation should be ensured before any development is undertaken on site to ensure that the reasons for the SINC designation are maintained. This could be possible given the proposed land use on site, however, it is recommended that no residential development is allowed, and access to visitor facilities is limited to public transport, walking and cycling. River Usk SSSI/SAC less than 2km away.
32.	**Bassaleg**	• Green Infrastructure should be considered throughout the development of the site, especially as the railway corridor may be an important ecological route. • The site is adjacent to the Afon Ebbw River SINC. • It should be ensured that development does not affect the watercourse negatively.

	Site name	**Notes/ Recommendations** (Note: recommendations made in February 2012, assessments updated Dec 2012 with further environmental information. Further environmental information for designated sites included within Appendix G policy assessments)
		• The development for elderly accommodation and mixed residential should include the provision of a local convenience shop to ensure the development of an inclusive community. • Walking/Cycling routes to key local facilities should be enhanced, and connection with the national cycle trails ensured.

33.	**Castleton**	• Taken together the sites are likely to have a significant effect on the landscape and townscape as the pose a significant increase to the settlement.
		• The site is subject to the following nature conservation designations:
		  • 1415.C1 Underpass Field SINC - adjacent (the other sites in the strategic site are all within 1km of this designation);
		  • All of the sites within the strategic site are within 1km of the Gwent Levels - St Brides SSSI
		It is recommended that any development likely to harm the environmental designations or protected species should not be permitted.
		• PROWs should be retained and enhanced.
		• Sites should be surveyed for their potential for providing habitats for important species, and mitigation implemented where possible ahead of development. This is applicable to both brownfield and greenfield sites.
		• Part of site is adjacent to a main road which could lead to noise pollution effects on residents. Further, proximity to the road may exacerbate an increase in traffic which will necessarily increase from such as substantial increase in housing in an out of town location.
		• SAM adjacent to site (2065.C1) - it should be ensured that the setting of the site is not negatively affected by development.
		• The sites could include some employment/mix use development to encourage local employment and reduce the need to travel.
		• Dedicated walking and cycling routes should be created and enhanced, especially to connect the settlement with centres of employment.

34.	**Bettws**	• Development should include the provision of open space for recreation within 300m walking distance for all residents. • SINC designations should be avoided included a substantial buffer area to protect important habitats and species. 0.52% of site1117.C1 and 1.10% of site 1117.C2 are within the Mescoed Mawr/Mescoed Bach SINC. • The development should include a convenience store to reduce the need for travel. • Area of deprivation: it should be ensured that the local community benefits from the development. • It should be ensured that no residential development is built within the flood plain or increases surface water runoff (net). • It should be ensured that the woodland areas are not affected by development. • It should be ensured that the tourism potential of the woodland areas for example is not lost through the development of the area for housing. Mixed use development could be encouraged, to improve local sustainability, and improve employment rates. Walking and cycling routes to areas of employment should be fully developed alongside safe routes to schools.
35.	**Broadway**	• 1.39% of the site is within the River Usk SAC and SSSI designation. Any development that could potentially affect the river should

	Site name	**Notes/ Recommendations** (Note: recommendations made in February 2012, assessments updated Dec 2012 with further environmental information. Further environmental information for designated sites included within Appendix G policy assessments)
		not be permitted. A significant buffer should be maintained between any development and the river. • Within ASA - adjoins amphitheatre. It should be ensured that any development or increase in visitors to the area does not negatively affect the conservation area and its assets. • It is recommended that the site be allocated to include facilities for use by tourists such as accommodation.
36.	**Caerleon North**	• Development is large scale and thus is likely to have a large effect on the landscape quality of the area. Mitigation should be ensured through the masterplanning process as well as through design codes to minimise any negative effects. This could be done through the development of green infrastructure to provide ecological corridors as well as walking and cycling routes throughout the site and connecting the site to the wider area. This should incorporate any existing trees and hedgerows on the site. • Lodge Wood SINC (13.5% of 1665.C1 is within the SINC) should be maintained and enhanced where possible- development should not be permitted in this location. • The River Usk SSSI/SAC is within 1km of both sites. • Although the site is not within the flood plain, it should be ensured that there is no net increase in surface water runoff as a result of development, to reduce the increase in flood risk. Green infrastructure could incorporate SUDS to enable this. • It should be ensured that the development does not negatively affect the SAM or its setting. The mix of uses could include uses that may encourage the development of tourism in the historic town of Caerleon, and capitalising on its assets, alongside the provision of facilities and services for local people.
37.	**Carcraft**	• Green infrastructure could be used to enhance the ecological value of the site. • The site is within 1km of the River Usk SSSI/SAC and Solutia Site SINC. • Housing should be located as far from road infrastructure as possible as part of the mix of uses.
38.	**Retail East**	• Next to Usk Way West SINC (0.05km) - any potentially negative effects on habitats or species should be investigated and mitigated prior to development on site. • The site is less than 1km from the River Usk SSSI/SAC. • Further development of the site should seek to enhance green space throughout, to connect to the nearby SINC as well as the wider biodiversity value of the plan area. • The site is in Pillgwenlly ward, which suffers from high levels of deprivation. As such, it is recommended that alongside the provision of retail, the site offers a wider range of community and local facilities to promote an increase in equality. As suggested in the submission, non-car accessibility should be enhanced through any development on site.
39.	**Eastern Expansion Area**	• 13.65% of 250.C1 is within the Routes Wood SINC designation (65.C1 is 0.65km from Monk's Ditch SINC) - any potentially negative effects on habitats or species should be investigated and mitigated prior to development on site. • 4.45 % of 250.C1 is within the Langstone-Llanmartin Meadows SSSI. 65.C1 is less than 2km from the same designation. • Part C2 designation: it is recommended that development does not occur within the flood plain, and that SUDS are implemented

	Site name	**Notes/ Recommendations** (Note: recommendations made in February 2012, assessments updated Dec 2012 with further environmental information. Further environmental information for designated sites included within Appendix G policy assessments)
		throughout the site to ensure that there is no increase in net surface water runoff. Avoiding the flood plain will also help to ensure that water quality is maintained. • The areas classified as high quality agricultural land should not be developed if possible. Further, the retention of the woodland is recommended. • It is recommended that the sites provides a mix of uses to include a full range of community facilities such as those included within ***Table 7.1*** of the SAR to reduce the need to travel and reduce potential inequalities. • There is a Scheduled Ancient Monument within the site - a Bronze Age round barrow (Mm 170) - near Underwood; and another - a motte (Mn59) - close to the site at Langstone Court Farm. ASA borders the southern limits of Llanwern Park. It should be ensured that the development of the site does not negatively affect the setting or integrity of archaeological features. Where possible these should be enhanced. The mix of uses could include tourist facilities to maximise the tourism potential of the area. • Public transport improvements should be required as part of development on the site.
40.	**Coleg Gwent**	• In order to determine the best use for the site, the local need to educational facilities vs. employment and leisure facilities should be investigated. Whichever proposal is likely to enable the reduction in inequalities in the context of other sites being carried forward should be pursued. Either option is likely to improve employment opportunities in the area. • Green space should be enhanced as part of proposals. This should incorporate SUDS as part of a flood risk reduction strategy. • Any development on site should seek to avoid effect to the watercourse. The site is less than 2km from the River Usk SAC. The site is also less than 1km from the Gwent Levels - Nash and Goldcliff SSSI and the Solutia Site SINC.
41.	**Glan Llyn**	• 0.034% of the site is within the Gwent Levels - Redwick and Llandevenny SSSI and 0.03% is Monk's Ditch SINC. The River Usk SAC is less than 2km away. The comprehensive redevelopment of the site will enable the development of an extensive green infrastructure network to enhance the biodiversity potential of the site. This could also incorporate SUDS to minimise the risk of flooding, as well as walking and cycling routes, within the site and connecting to the wider area, to encourage a modal shift to more sustainable modes of transport. • Development on the site could potentially include some tourist facilities, to capitalise on any archaeological assets, as the site is within the ASA. • It should be ensured that the proposed improvements to public transport are realised and will accommodate all access to, from and within the site. It is recommended that the site is not 'self contained' as this infers that it will not integrate with or benefit the existing community especially the community of Ringland, which suffers deprivation levels. It should be ensured that connectivity to surrounding areas is enhanced to enable the full integration of the new development within the community to reduce inequalities. • A full range of community facilities should be provided within development.

	Site name	Notes/ Recommendations (Note: recommendations made in February 2012, assessments updated Dec 2012 with further environmental information. Further environmental information for designated sites included within Appendix G policy assessments)
42.	**Gloch Wen**	• Would provide a substantial increase to the current settlement size, depending on the proportion of open space provided. It is recommended that the proportion of open space is substantial to reduce this effect. • It should be ensured that any PROWs are enhanced through the development of the site. • Adjacent to SINC (Afon Ebbw river) (0.13% 2072.C1 and 0.15% 2072.C2 are within the SINC, site 2072.C3 is 0.4km away) - it is recommended that development is not permitted which may encroach or negatively affect the SINC. The ecological value of the site should be investigated and any potential effects mitigated before commencement of development. Similarly, the quality of the watercourse should be enhanced where possible. • Any trees, especially those protected by TPOs, should be retained on the site and their integrity maintained. • The importance of all hedgerows on site should be evaluated, and these features should be maintained where they are important to local biodiversity as part of a wider scheme to enhance ecological connectivity through the provision of green infrastructure. • SAM adjacent- it should be ensured that the setting of the SAM is not negatively affected by development. • The development of the site would lead to the loss of allotments- it should be ensured that development provides alternative provision, in favourable locations for those who currently use this community facility. • It should be ensured that walking and cycling routes are enhanced and connect to the wider area, not only to include the stated routes to school and employment, but to other local services and facilities such as health also.
43.	**Airport**	It is recommended that this site is **not carried forward** as significant negative effects are predicted against the following social aspects and environmental designations and features: • SAC (Severn Estuary) (98.16% of the site is within the SAC); • Flood Risk; • SSSI (Gwent Levels - Redwick and Llandevenny) (35.24% of the site is within the SSSI); • SINC (The Routes Wood) (5.37% of the site is within the SINC); • SPA (Severn Estuary) (25.97% of the site is within the SPA); • RAMSAR (Severn Estuary); • Public Rights of Way (x10); • TPOs (x2); • Loss of ecological connectivity; • Greenfield land; • Agricultural land; • Landscape value and visual intrusion; • Air quality;

	Site name	**Notes/ Recommendations** (Note: recommendations made in February 2012, assessments updated Dec 2012 with further environmental information. Further environmental information for designated sites included within Appendix G policy assessments)
		• Noise pollution; • Lack of existing infrastructure; • Water Quality and integrity of Severn Estuary; • Archaeological Sensitive Area (part of site); • Gwent Levels Historic Landscape; and • Tourism potential.
44.	**adj Hartridge**	• Adjacent to SINC (Ringland Way Marsh) (site 1525.C8) and 93.34% of site 1525.C4 is within SINC (Hartridge Wood): Any potentially negative effects from development should be mitigated wherever possible. Less than 2km to Gwent Levels - Nash and Goldcliff SSSI (both sites). • It is recommended that the site include a convenience store to reduce the need to travel for residents. • It should be ensured that accessibility by public transport, including bus, walking and cycling, is convenient and reliable ahead of occupation on site. • It should be ensured that enhancements to the sewerage network are ensured ahead of development to prevent potential pollution to land and water. • It is recommended that the part of the site within the ASA is avoided, or any potential effects mitigated ahead of development.
45.	**Crindau**	• In addition to the highway works proposed as part of the scheme, it is recommended that it includes improvements to sustainable transport including walking and cycling and public transport improvements. • Close to SAC and SSSI (River Usk SSSI 1.205% of 1511.C1 and 0.012% 224.C1, River Usk SAC - 0.22% of 1511.C1 and 0.01% of 224.C1; 0.11km from 224.C2), SINC (Monmouthshire-Brecon Canal (Main Arm) site - 4% of 1511.C1 within SINC, 224.C1 0.23km away, 224.C2 0.07km away) - it should be ensured that the development and any associated works and traffic will not lead to negative effects on the environmental designations or their occupants in accordance with the River Usk Strategy[12]. • It should be ensured that the encouragement of public accessibility to the river does not compromise its features in terms of its environmental designation.
46.	**DIY**	• Potential increase in air and noise pollution if site is used for residential development- it is recommended that the site is development for commercial purposes (employment or retail). The use of the site for either of these purposes may also help to reduce inequalities. In this case, employment uses are recommended. • Sites are less than 1km from the Cefn Wood (East +West) SINC designation - it should be ensured that the development and any associated works and traffic will not lead to negative effects on the environmental designations.

[12] http://www.newport.gov.uk/stellent/groups/public/documents/plans_and_strategies/cont419715.pdf

Table D.6 – NCC Response to SA Recommendations

ALLOCATION	CANDIDATE SITE NUMBER	TABLE D.1 REFERENCE	Council Response to SA Recommendation
H49 Mill Street	1525.C2	No.4	The recommendations set out in Table D5 identify some concerns with flood risk, biodiversity and archeology. The allocation has been amended so that the area at highest flood risk and most sensitive in terms of archaeology has been removed. The remaining site will be covered by the LDP policies, which are considered adequate to cover the flood, biodiversity and archeology sensitivities of the site.
H50 Herbert Road & Enterprise House	2060.C1 1521.C1	No25 No.25	The recommendations set out in Table D.5 identify some concerns with flood risk, accessibility, biodiversity and landscaping. It is considered that the policies within the LDP provide an adequate framework to control theses issues to ensure any planning applications consider these critical issues for the site at the detailed stage.
Whiteheads Works	232.C2	No. 6	The recommendations set out in Table D.5 identify some concerns with biodiversity and level of employment provision. It is considered that the policies within the LDP provide an adequate framework to control theses issues to ensure any planning applications consider these critical issues for the site at the detailed stage.
H52 Old Town Dock Remainder	Not Candidate Site	N/A	N/A
H53 Bideford Road	Not Candidate Site	N/A	N/A
H54 Former Alcan Site	1562.C1	No.19	The recommendations set out in Table D.5 identify some concerns with biodiversity, woodlands and ecological connectivity. It is considered that the policies within the LDP provide a clear steer for an appropriate mixed use approach as well as an adequate framework to control these issues to ensure any planning applications consider the impact on biodiversity, woodlands and ecological connectivity as key issues for the site at the detailed stage.
H55 Crindau	1511.C1	No.45	The recommendations set out in Table D.5 identify some concerns with accessibility, biodiversity and design. It is considered that the policies within the LDP and masterplan for the site provides an adequate framework to control theses issues to ensure any planning applications consider these critical issues for the site at the detailed stage.
H56 Woodland Site,	1525.C4	No.44	The recommendations set out in Table D.5 identify some

ALLOCATION	CANDIDATE SITE NUMBER	TABLE D.1 REFERENCE	Council Response to SA Recommendation
Ringland			concerns with biodiversity, accessibility, infrastructure, archaeology and retail convenience. It is considered that the policies within the LDP provide an adequate framework to control theses issues to ensure any planning applications consider these critical issues for the site at the detailed stage. The recommendation for a convenience store on the site has not been taken forward. The site will in the future have access to the district centre at Glan Llyn which may provide adequate coverage.
H57 Hartridge Farm Road	1525.C8	No.44	
EM1 (i) Duffryn	1664.C1 232.C1	No.28 No.28	Table D.5 recommends that only the previously developed sites are considered for development. However, the plan proposes to allocate a larger area, as the employment site is considered to be of key importance to Newport and the region. The extent if the allocation has been determined by the proposed Duffryn Link Road, which will form a physical boundary to the allocation. The accompanying policy (EM1(i)) required proposals to demonstrate that the national economic benefits of the proposals outweigh the environmental impacts. With regards to the other issues raised i.e. development within the ASA, provision of public open space, flood risk and surface water run off and provision of services, it is considered that the policies in the LDP provide an adequate framework to control these issues to ensure any planning applications consider these critical issues for the site at the detailed stage.
EM1 (ii) East of Queensway Meadows	232.C3	No.5	This site is a longstanding allocation that has been partly developed. Employment uses on the site would benefit from proximity to the Southern Distributor Road and either the new M4 or other M4 Corridor Enhancement Measures being considered by the Welsh Government. The line of the new M4 provides a firm boundary to the site. The particular ecological issues of the site will need to be carefully managed, and the landscape assessment will need to recognise the highway improvements to Queensway that are underway and the other potential road schemes. The proposed uses are not highly vulnerable in flood risk terms, but will need careful assessment. The listed building and its setting will also need to be safeguarded.
EM1 (iii)Celtic Springs	Not Candidate Site	N/A	N/A
EM1 (iv)Solutia	169.C1	No.5	This site is located largely between the Solutia chemical works

ALLOCATION	CANDIDATE SITE NUMBER	TABLE D.1 REFERENCE	Council Response to SA Recommendation
			and an industrial estate, with Newport International Sports Village to the north. The latter provides valuable and nationally important facilities, but its site is fully developed, and there would be distinct benefits accruing from additional facilities. Employment uses on the site would also benefit from proximity to the Southern Distributor Road and either the new M4 or other M4 Corridor Enhancement Measures being considered by the Welsh Government. The line of the new M4 provides a firm boundary to the site. The particular ecological issues of the site will need to be carefully managed, and the landscape assessment will need to recognise the industrial structures in the adjacent areas. The proposed uses are not highly vulnerable in flood risk terms, but will need careful assessment.
EM1 (v)Newport Docks	Not Candidate Site	N/A	N/A
EM1 (vi) Gwent Europark	Not Candidate Site	N/A	N/A
EM1 (vii) Port Road, Maesglas	Not Candidate Site	N/A	N/A
EM1 (viii) Land off chartist drive	28.C4	No.46	The recommendations set out in Table D.5 have been taken forward the site is allocated for employment use
EM 2 (i) Glan Llyn	1466.C1	No.41	The recommendations set out in Table D.5 identify some concerns with flood risk, accessibility, biodiversity and landscaping. It is considered that the policies within the LDP provide an adequate framework to control theses issues to ensure any planning applications consider these critical issues for the site for its future stages. The site has an extant permission agreed as part of a masterplanned approach dealing with issues such as access, archaeology and biodiversity.
EM2 (ii)Llanwern Former Steelworks	1420.C1	No.26	The recommendations set out in Table D.5 identify some concerns with accessibility, biodiversity and water quality. It is considered that the policies within the LDP and masterplan for the site provides an adequate framework to control theses issues to ensure any planning applications consider these critical issues for the site at the detailed stage. The allocation is located on the brownfield elements of the Candidate Site. The area designated as SSSI has also been removed from the allocation.
EM2 (iii)Llanwern Former Tipping Area	1420.C1	No.26	
EM2 (iv) Phoenix Park	232.C4	No.11	The recommendations set out in Table D.5 identify the need for a convenience store. The site has received planning permission for residential and employment uses and this does not include a

ALLOCATION	CANDIDATE SITE NUMBER	TABLE D.1 REFERENCE	Council Response to SA Recommendation
			convenience store.
EM2 (v) Old Town Dock/George Street	Not Candidate Site	N/A	N/A
EM2 (vi) Lower Dock Street	Not Candidate Site	N/A	N/A
EM2 (vii) river front	Not Candidate Site	N/A	N/A
EM2 (viii)Godfrey Road	Not Candidate Site	N/A	N/A
EM2 (ix)Crindau	1511.C1	No.45	The recommendations set out in Table D.5 identify some concerns with accessibility, biodiversity and design. It is considered that the policies within the LDP and masterplan for the site provides an adequate framework to control theses issues to ensure any planning applications consider these critical issues for the site at the detailed stage.
EM2 (x) Whitehead	232.C2	No.6	The recommendations set out in Table D.5 identify some concerns with biodiversity and level of employment provision. It is considered that the policies within the LDP provide an adequate framework to control theses issues to ensure any planning applications consider these critical issues for the site at the detailed stage.
EM2 (xi)Monmouthshire Bank Sidings	198.C1	No.6	
EM2 (xii) Novelis	1562.C1	No. 19	The recommendations set out in Table D.5 identify some concerns with biodiversity and mix of uses. It is considered that the policies within the LDP provide a clear steer for a appropriate mixed use approach as well as an adequate framework to control theses issues to ensure any planning applications consider these critical issues for the site at the detailed stage.

Appendix E Sustainability Appraisal Framework for Assessment of Preferred Strategy (ISAR) (January 2010)

Table E.1 - Sustainability Appraisal Framework for Assessment of Preferred Strategy (ISAR) January 2010

Key to Data Availability for Indicators

Bold = Known data for study area

Italic = Known data at regional level

Underlined = Data for study area and regional data currently unknown

No	SA Objective	Potential Indicators	Target	SEA Topics
Environmental				
1	Protect and enhance existing valued landscapes and open spaces and encourage their sustainable use, enjoyment and management.	Countryside management schemes implemented	Increase	Population, Human Health, Landscape, Soil
		Woodland schemes implemented	Increase	
		Accessibility of the countryside by public transport	Increase	
		% change in accessibility and connectivity of public rights of way[13]	Increase	
		Amount of valued urban and rural open space lost to development	Minimise- target of nil	
		Total area of valued open space	Increase	
		Amount or proportion of landscape subject to enhancement associated with development	Increase	
		Proportion of valued landscape lost to development	Minimise- target of nil	
2	To protect, manage and enhance biodiversity	**Numbers, area and condition of international, European, national, regional and local designated sites**	Welsh Assembly Government: by 2015, 95 per cent of Welsh SSSIs in favourable condition; By 2010, 95 per cent of international sites in favourable condition; and by 2026, all sites to be in favourable condition.	Biodiversity, Flora, Fauna, Soil, Water, Air, Climatic Factors,

[13] Public rights of way include: footpaths; bridleways; Byways Open to All Traffic (BOATs) and Restricted Byways (formally designated as Roads Used as Public Paths)

No	SA Objective	Potential Indicators	Target	SEA Topics
		Loss of trees covered by TPOs	Minimise- target of nil	Human Health,
		Length of hedgerows	Increase	
		% change in tree planting	Increase	
		% trees lost to development that are replaced	Minimise- target of nil	
		Species of acknowledged conservation concern	Halt losses	
		Amount of green space important for ecological connectivity identified and safeguarded from development	LBAP targets to be added when they've been updated.	
		Area of important wildlife habitat lost to other uses affecting functional viability	Zero	
		Amount of important wildlife species lost to other uses	Zero	
		No. of businesses achieving the Biodiversity Benchmark award	No target identified	
		Number and area of land and aquatic habitat creation schemes	LBAP targets to be added when they've been updated.	
		The area of land affected by planning applications approved that lead to loss of species, habitats of important biodiversity value	Zero	
		Extent of important habitats or landscapes present in commons	LBAP targets to be added when they've been updated.	
		Area of land enhanced for biodiversity value through the use of s106 agreements	LBAP targets to be added when they've been updated.	
		Extent of invasive species	Decrease	
		% of development and land use incorporating Green Infrastructure	Increase	
		% native species used in landscaping schemes	Increase	

No	SA Objective	Potential Indicators	Target	SEA Topics
3	To ensure efficient use of land and protect geodiversity, soil quality and mineral resources	**% dwellings built on previously developed land subject to assessment against the sustainability objectives'**	60% (UK government)	Landscape, Soil, Climatic Factors, Air, Human Health, Biodiversity
		% of residential sites developed at a density of 30-50 dph	Increase- target 100%	
		Number of empty properties	Decrease	
		Area of potentially contaminated land remediated and brought back into use	Increase	
		% of materials used that have been sourced from the local area	Increase	
		% of reclaimed materials used in development	Increase	
		% of planning permissions granted resulting in loss of grades 1,2 and 3a land	Decrease	
		Number of organic farming initiatives supported	Increase	
		Number and take-up of allotments	Increase	
4	To improve air quality	**Number of (NO_2) designated AQMAs**	Decrease – target of nil	Air, Climatic Factors, Human Health
		Other recorded pollutants (Ozone, PM10)	To meet statutory UK air quality criteria objectives	
		No of exceedences of the 100ug/m3 8 hr mean NO_x	No target identified	
		Implemented measures of Air Quality Action Plan	Increase	
		Native vegetation and planting schemes to provide carbon sink capacity and improve air quality locally	Increase	
5	To reduce emissions of greenhouse gases	**Carbon Dioxide (CO_2) emissions per capita**	Decrease 3% per annum	Air, Climatic Factors, Human Health
		Methane emissions per capita	Decrease 3% per annum	
		Nitrous Oxide (NO_2) emissions per capita	Decrease 3% per annum	

No	SA Objective	Potential Indicators	Target	SEA Topics
		Water vapour emissions	Decrease 3% per annum	
		Halocarbons emissions	Decrease 3% per annum	
		Ozone	Decrease 3% per annum	
6	To minimise noise pollution	**No of residential permissions granted in TAN11 category C and D locations**	Nil	Human Health, Population
7	To maintain and, where possible, enhance water quality	Improvements to existing off-line drainage	Increase	Water, Human Health, Biodiversity, Flora and Fauna
		Development buffer zones along water courses	Increase	
		Biological river quality	Increase % of **rivers of good or excellent quality**	
		River water chemistry levels	Increase % of **rivers of good or excellent quality**	
		Nutrient status of rivers (phosphate and nitrate levels)	% decrease in rivers with high levels of nutrients	
		Groundwater Quality	Increase	
8	To reduce water consumption	No of grey water systems used in new developments	Increase	Water, Human Health, Climatic Factors
		Incorporation of dual water supplies into developments	Increase	
		Installation of low water use appliances into developments	Increase	
		Internal potable water use of less than or equal to 32m³ per bedspace per year	Increase	
		Installation of water efficient fixtures	Increase	
		Rainwater collection system for watering gardens and landscaped areas	Increase	

No	SA Objective	Potential Indicators	Target	SEA Topics
		Water abstractions at source	Increase	
9	To minimise the risk of and from flooding	**% of development approved in flood risk areas contrary to TAN15**	Zero	Water, Human Health, Climatic Factors, Population, Landscape, Material Assets
		% relevant permissions with SUDS schemes where appropriate	by 50% in areas of low probability of flooding, 75% in areas of medium flood risk, and 100% in areas of high flood risk, at peak times from: • Hard surface runoff • Roof runoff	
		Number of properties at risk of flooding	Decrease	
		% of flood plain used for flood storage/alleviation, coastal squeeze management, biodiversity enhancement	Increase	
10	Increase energy efficiency	Energy consumption per capita	Decrease	Climatic Factors, Population, Air, Human Health
		Dwellings improved for their energy efficiency, addressing fuel poverty	Increase	
		Development served by heating and hot water systems with an average NO_X emission rate of less than or equal to 40 NO_X mg/kWh	Increase	
		Provision of eco labelled white goods	Increase	
		Number of businesses achieving Green Dragon standard	Increase	
		SAP ratings of new housing	The target SAP for all dwellings is a minimum of 65 described under the Home Energy Conservation Act (HECA) 1995	
		Development where 75% dedicated low energy lights have been specified	Increase	
11	Promote	*Residual electricity generated from renewable sources following*	Increase	

No	SA Objective	Potential Indicators	Target	SEA Topics
	renewable energy production and use	*energy efficiency measures*		
		No of planning permissions for environmentally appropriate renewable energy schemes	Increase	
12	Promote the reduction of waste generation and landfill, and increase levels of recycling to achieve more sustainable waste management	**Total Municipal Waste reduced**	By 2010, achieve a reduction in waste produced (by the authority) equivalent to at least 10% of the 1998 arisings figure.	Climatic Factors, Material Assets, Landscape, Human Health, Soil
			By 2020, waste arisings per person should be less than 300kg per annum	
		% of Municipal Waste recycled/reused	17.50% (NCC by 2010) By 2009/10, achieve at least 40% recycling/composting with a minimum of 15% composting (with only compost derived from source segregated materials counting) and 15% recycling.	
		% Waste Composted/Treated Biologically	15.50% (NCC) by 2010 By 2009/10, achieve at least 40% recycling/composting with a minimum of 15% composting (with only compost derived from source segregated materials counting) and 15% recycling.	
		% of commercial waste recycling	25% by 2010 (WAG)	
		%of Municipal waste composted	25% by 2010 (WAG)	
		% of Municipal waste used to recover heat or energy	No target identified	
		% biodegradable municipal waste (BMW) being landfilled	by 2010 to reduce BMW landfilled to 75% (by weight) of that produced in 1995 (Landfill Directive) (2013: 50%; 2020: 35%)	
13	Promote	% of dwellings built to Code for Sustainable Homes Level 6	Increase – All buildings to meet Code for	Climatic

No	SA Objective	Potential Indicators	Target	SEA Topics
	sustainable, high quality design in all development to contribute to a higher quality built and natural environment whilst adapting to the potential impacts of climate change	(WAG definition)	Sustainable Homes Level 3 by 2009	Factors, Material Assets, Human Health
		% of commercial buildings meeting BREEAM Excellent Standard or equivalent	All buildings to be zero carbon by 2011	
		% of development with a design statement submitted	100%	
		Major schemes where DCfW has been consulted	Increase	
Social				
14	Improve equality of opportunities amongst all social groups	**No of wards in the 100 most deprived wards according to Index of Multiple deprivation**	Decrease	Population, Human Health
		% of population of working age claiming benefits	Decrease	
		Proportion of children under sixteen living in low income households	Decrease	
15	Improve the health and wellbeing of the population	**Infant Mortality Rates**	Decrease	Population, Human Health, Air
		Limiting long term illness	Decrease	
		Distance and transport accessibility to access health care facilities	Improve	
		% Extra Curricular activities (7-11/11-16 year olds)	70%/60% (05 Sports Council for Wales)	
		Adult physical activity	(see local area partnership agreement not yet published)	
		Provision of accessible natural greenspace reaching CCW standards	Achieve 100% conformity	
16	Protect and provide improved	**Provision of accessible open space reaching NPFA standards**	Achieve 100% conformity	Population, Human

No	SA Objective	Potential Indicators	Target	SEA Topics
	local, social, recreational and leisure facilities for all sectors of the community, and improve access to them	**Level of community infrastructure per ward**	Increase	Health, Material Assets, Air
		Loss of local community facilities	Decrease	
		Number of S106 agreements secured on new developments for improvements in community facilities	Increase	
		Provision of NEAPs and LEAPs	Increase	
17	Improve the quantity, quality, variety and affordability of housing	**No of new affordable units delivered and integrated into developments in relation to population growth**	Increase	Population, Human Health, Material Assets
		% of eligible residential planning permissions where affordable housing has been negotiated	Increase	
		Number of people from vulnerable groups with access to safe, secure accommodation that meets their needs	Increase	
		% of houses meeting Welsh Housing Quality Standard	100%	
		Affordability of housing for people in lower quartiles of income	Increase	
		Land provided to meet the needs of gypsies and travellers	Increase	
18	To contribute to a reduction in crime and social disorder and the fear of crime, promoting safer neighbourhoods	**Average crime rate in Newport per 1000 population**	▪ To reduce assaults by 6% each year (18% over three years) ▪ To reduce vehicle crime by 6% each year (18% over three years) ▪ To reduce robbery by 6% each year (18% over three years) ▪ To reduce domestic burglary (incl. attempts) by 6% each year (18% over three years) ▪ To reduce business crime by 6% (18% over three years) ▪ To reduce criminal damage (excl. 59) by 6% each year (18% over three years)	Population, Human Health

No	SA Objective	Potential Indicators	Target	SEA Topics
		Fear of crime per ward during the day and at night	To reduce the level of ASB by 5% per annum each year for the three year period	
		Provision of accessible open space reaching NPFA standards	Increase	
		% of development that meets the 'secured by design' certification criteria	Increase	
		% of public realm with natural surveillance	Increase	
		Proportion of city centre covered by CCTV	Increase	
19	To conserve and enhance the historic environment of Newport	**No and condition of listed buildings**	No target identified	Material Assets, Landscape, Climatic Factors
		No of buildings on buildings at risk register	Decrease	
		Planning permissions granted against conservation officer recommendations	Nil	
		Number of conservation area appraisals undertaken during plan period	Increase to full coverage	
		Application of ASIDOHL to development in Gwent Levels	100%	
		Area of ancient woodland and planted ancient woodland	Increase	
		No. of Scheduled Ancient Monuments adversely affected	Nil	
		No. of Historic Parks and Gardens adversely affected	Nil	
20	To identify, promote, strengthen and enhance the cultural identity of Newport	**% of welsh speakers in Newport**	Increase	Material Assets, Landscape, Population, Human Health
		% change in the number of community groups registered	Increase overall number	
		% of pupils in welsh medium education note: additional indicators are being internally discussed and are ongoing	Increase	

No	SA Objective	Potential Indicators	Target	SEA Topics
		Cultural and arts events and activities taking place within Newport	Increase	
		% people benefiting from the Chartist Citizenship project	Increase	
Economic				
21	To enable high and stable levels of local employment in Newport	**% change of economically active**	Increase	Material Assets, Population
		% of population employed	Increase	
		% good quality local jobs created	Increase	
		Density of jobs per hectare	No target identified	
		% change in provision of highly skilled employment opportunities	Increase	
22	To support diverse and viable business growth and to achieve economic growth to contribute to business competitiveness, focusing on inward investment	**Mix of employment by sector (%)**	Achieve more equitable balance	Material Assets, Population
23	To enhance the profile of Newport, and strengthen the tourist economy, sensitively capitalising on	**Total number of visitors to attractions in Newport**	Increase	Material Assets, Population
		Number of jobs created in the tourism sector	Create a further full time 250 jobs whilst supporting the present 3635 FTE	
		Expenditure by sector	Increase	
		Revenue by category of visitor	Increase the value of Tourism by 20%	

No	SA Objective	Potential Indicators	Target	SEA Topics
	environmental, heritage, and leisure assets	*Tourist Days*	Increase	
		Bed Space Availability	Increase	
		Number of visitors to the wetland reserve	Increase	
		Number of visitors attracted by the historic landscape	Increase	
		Use of the Monmouthshire & Brecon Canal for walking/cycling, nature conservation and other water based recreation as well as a navigation route	Increase	
24	To contribute to educational attainment and increase skill levels to promote/develop a knowledge based economy	**Proportion of 19 year olds with Level 2 qualifications (5 GCSE A*-C or NVQ equivalent)**	Increase	Population, Material Assets
		% of population attaining highest qualification – Level 4/5	Increase	
		% of young people in post-16 education	Increase	
		% with no qualifications	Decrease	
		% of school age pupil exclusion rates	Decrease	
		Key Stage 4 achievement levels	Increase	
		% of people with basic skills through 'The Basic Skills Employer Pledge'	Increase- target 100%	
		% increase in adult education courses	Increase	
		% increase in Welsh Medium education	Increase	
		Retention of students post qualification	Increase	
		S106 agreements that provide educational facilities where appropriate	Increase	
25	Reducing the need to travel by	Provision of sufficient IT infrastructure and space within new dwellings to enable home working	Increase	Population, Material

No	SA Objective	Potential Indicators	Target	SEA Topics
	improving local service provision	**Provision of a sufficient level of local facilities according to thresholds** note: additional indicators are being internally discussed and are ongoing	Increase see Appendix A for thresholds	Assets, Air, Climatic Factors, Human Health
26	Promote attractive and viable alternatives to car transport to achieve a modal shift to more sustainable modes of transport, including walking and cycling	**No of safe routes to school schemes**	Increase	
		Proximity of new development to public transport nodes	Increase	
		No and implementation of good quality green travel plans	Increase	
		Modal Split - % of population travelling to work by sustainable modes, including working from home	Increase % by sustainable modes	
		Integration of Sustrans routes with built development	Increase	
		No and value of S106 agreement secured for improvements in public transport, cycling and walking where appropriate	Increase	
27	To seek to improve the vitality and viability of the City Centre	Footfall counts	Increase footfall	Population, Material Assets
		Independent retailer representation	Increase	
		Mix of uses in the City Centre	No target identified	
		Vacancy rates and % of available floorspace that is vacant	Decrease: below 10% ATCM	
		Rental levels per square foot	Increase	
		Residents' and visitors' satisfaction with local area and facilities	Improve	

Appendix F Consultation Responses to the (non-statutory) ISAR (May 2010)

F.1 Newport City Council LDP ISAR Consultation Response Table

Respondent	Comments	Response	Action
Torfaen County Borough Council	Whilst reference is made to the Torfaen Local Plan 2000 it is considered that reference should also be made to the Torfaen LDP Preferred Strategy (2008).	Agreed.	Latest version of Torfaen LDP included in PPP review revisions.
	Whilst not referred to in the preferred strategy Torfaen County Borough Council would like to reiterate its comments made in relation to the draft planning framework for Whitehead Works/ Monmouthshire Bank Sidings if this site is to form part of the LDP proposals	The representations received have been noted by the Council. LDP allocations will take into account relevant information such as SPG. (The Monmouthshire Bank Sidings part of the site won consent on appeal for predominantly residential use for up to 575 dwellings).	No further action required.
Cadw Welsh Historic Monuments	I acknowledge receipt of the consultation and confirm that Cadw has no comments to make.	Noted.	No further action necessary.
Countryside Council For Wales	**GENERAL COMMENTS**		
	CCW would like to commend Newport on the overall quality and thoroughness of this assessment and our comments should be seen in that light. Many of the points below highlight areas for improvement or refinement in the development of Newport's SEA/SA and should help focus the process towards delivering the overall aims and objectives as set out. We particularly welcome and support the strong suite of recommended changes made within it to help mitigate the significant environmental effects of the Newport LDP and hope to see these fully reflected in the developing LDP process. We welcome the clear distinction between the SA and SEA process and also the cross references to the ongoing Habitats Regulations Appraisal, on which we have commented separately. It should be	Noted with thanks.	See below.

Respondent	Comments	Response	Action
	noted, however, that the latter assessment process only deals with any likely significant effects that the Plan may have on European and international sites and will not consider impacts on national, regional or local sites, on protected species which are not themselves features of the designated sites, or of impacts related to landscape etc. These aspects will need to be considered in the context of this SA/SEA.		
	We also welcome the incorporation of many of our comments on the SEA Scoping Document into this initial SA, but also note that some of these have been deferred to the LDP process itself. This is not necessarily an issue, providing a clear audit trail is maintained which clearly shows how our comments have been addressed. We are also somewhat disappointed that our previous comments on the Plans, Policies and Programmes review section have only been partially addressed and, consequently, we feel that this section still has some significant weaknesses. There appears to be some confusion over the contents of the Preferred Strategy and the elements assessed by the SA/SEA (such as the nature of the airport proposals and the relationship of housing numbers and employment strategic alternatives and the actual strategic policies that implement them). However, this does not distract from the overall quality of the assessment and, providing the recommendations of the assessment are incorporated within the final plan and, as identified, further assessment carried out where necessary, we do not anticipate this being a significant issue.	Noted.	PPP review has now been updated. The recommendations of the assessment and how they have been taken into account in the development of the Deposit LDP are included in the SAR.
	1. INTRODUCTION		
	1.4 We welcome Newport CC's ongoing commitment to the SA/SEA process and the efforts made to incorporate our previous comments on the scoping report into the interim SA Report. We are slightly disappointed that a significant proportion of our comments have been judged as more appropriate to the LDP than to the SA/SEA process. The intention was to help the local authority to develop possible measures to mitigate for significant negative environmental effects identified by the SA/SEA process. However, if these comments are to be addressed within the LDP the same result will be achieved but this will need to be noted.	Noted.	No further action necessary.
	We have a small number of other concerns, for example, LANDMAP data should be available directly from the local authority as well as from the Web site and although Newport CC is not within any of the TAN 8 strategic search areas, it is specifically mentioned as one of the locations for intermediate size wind energy developments in the Ministerial Interim Planning Policy Statement 01/2005, but these should not detract from the positive response of the SEA team and their consultants.	Noted.	The Newport specific assessment on the potential for wind energy has been considered in the SA.
	1.18 We welcome the commitment to, and the incorporation of, the Welsh Assembly Government's Sustainable Development and climate change guidance and indicators into the sustainability indicators.	Noted with thanks.	No further action necessary.
	1.24 We welcome the clear distinction between the SEA and SA process set out both in this section	Noted with thanks.	No further action

Respondent	Comments	Response	Action
	and in the rest of the report. While we fully appreciate the Welsh Assembly Government's guidance on integrating the SA and SEA assessment into a single document, it should be noted that the requirements of the SEA Directive to assess and address the significant environmental effects of the plan must still be met and clearly set out within the combined process. We welcome, therefore, the extra clarification given in 2.27, 2.28 and table 2.5 of the following section.		necessary.
	1.32 – 1.40 We note the reference to the Habitats Regulations Appraisal process and refer you to our separate comments response to the Newport LDP HRA Initial Screening Report.	Noted.	No further action necessary.
	2. METHODOLOGY		
	Table 2.2 Scoring of Options Assessment. While this scoring system may seem to be overly complex we welcome the level detail it contains, particularly the distinction between 'neutral', 'positive/negative' and 'uncertain' outcomes.	Noted with thanks.	No further action necessary.
	Table 3.1 Review of relevant plans policies and programmes (PPPs). While we acknowledge that an extensive list of PPPs have been considered by the Newport SA/SEA process and welcome that a number of additional plans recommended in our response to the screening document have been included, we are disappointed that some plans that we regard as being key documents do not appear to have been included. For example, the relevant Catchment Flood-risk Management Plans (CFMP), neighbouring local authority LDP documents and the Wales Coastal Tourism Strategy. While we appreciate that some of these documents may still be in development (such as other LDPs, the current Water Resources Management Plan and the new Shoreline Management Plan (SMP2)) it would be sensible to reference their SEAs to help inform the Newport Plan, particularly as they are likely to be directly relevant to the assessment and achievement of several key objectives and strategic policies.	Agreed.	CFMPs; neighbouring LDPs; and Wales Coastal Tourism Strategy and other added to PPP review
	Table 3.2. While we appreciate that by its very nature the SA/SEA process is strategic and cannot be expected to go into the detail of every PPP, it is important that key objectives and targets relevant to the LDP are identified. As it currently stands, this aspect of the assessment is particularly weak and does not appear to adequately fulfil this role and, therefore, fully meet the requirement of the regulations. Given the importance of some of these documents for the future development of Newport (particularly in relation to water resources and flood risk management) the local authority should satisfy itself that this SA/SEA has adequately assessed their implications for the Newport LDP.	Agreed.	PPP review and interpretation revised where appropriate during the review and update of Stage A for the SAR August 2011.
	4 The environmental, social, economic and general baseline characteristics for Newport		
	4.13 Please note that the Landmap data should also be held by Newport CC and, while this may not be the most up to date information, it should have provided you with sufficient information to underpin a basic assessment.	Noted.	Landmap data added to Stage A.
	5 Identifying key sustainability issues		

Respondent	Comments	Response	Action
	Table 5.1 – Key sustainability issues and Opportunities. CCW welcomes the inclusion of this table and the clear way it sets out the rationale behind the identification of the potential issues and opportunities.	Noted with thanks.	No further action necessary.
	Poor Air Quality – We note and support the intention for any major new road infrastructure proposals to be considered under this issue, however, it is our understanding that the M4 relief road proposals are no longer going ahead and we question why this specific reference is contained within the SEA?	Noted.	Reference removed.
	Local Food Production - we welcome and support the opportunities identified under this issue and would suggest that it should be linked with both the biodiversity/flora and fauna, human health, water and soils SEA topic areas.	Noted.	Detail added to table.
	Landscape – While we largely agree with the issues and opportunities identified under the heading, we must point out that 'landscape' is highly unlikely to be a consideration in the assessment of impacts on SAC, SPA or Ramsar designations.	Noted.	Issue revised in SAR.
	Water Quality – In addition to the water quality issues identified we would strongly recommend that this assessment also considers the implications of development on contaminated land and the potential remobilisation of contaminated sediments under this heading (we do note that it is also considered under a separate heading, but this should be clearly cross-referenced to this issue). There are also potential 'in combination' effects associated with diffuse pollution associated with agricultural land management and large scale development on green field sites (particularly within or adjacent to the Gwent Levels SSSIs). This is particularly important as the SEA should identify these risks and propose suitable mitigation to address the significant adverse environmental effects associated with them. The relevant SEA topics should also include soils.	Noted.	Issue revised in SAR.
	Flood risk and water quality. While we largely agree with the issues and opportunities identified, given they are clearly mentioned in the text and would provide numerous opportunities for enhancement and mitigation, we would expect biodiversity, flora and fauna to be included in the SEA topics.	Noted.	Detail added to table.
	Commons. The table should also note the importance of commons for human health, access and recreation.	Noted.	Detail added to table.
	Biodiversity. While we welcome the inclusion of the European and international nature conservation sites in this table please note that the likely significant effects on these sites are being considered under the separate Habitats Regulations Appraisal (HRA). Please see our separate comments on this document. In addition, you should note that there are a number of European and international designations which are relevant to the Newport LDP, in addition to the two listed, and the list of features for the Usk and Severn Estuary suite of sites is incorrect. We would also expect the Sites of Special Scientific Interest (SSSI) that occur within the Newport LDP area to be listed, particularly those that comprise the Gwent Levels SSSI, due to their particular sensitivity to development pressures.	Noted.	Key issues table revised in accordance with recommendations .

Respondent	Comments	Response	Action
	Contaminated land – see comments above in relation to water quality. Relevant SEA topics should also include human health and water.	Noted.	Detail added to table.
	Waste – recycling rates and opportunities to enhance them may be an important issue but the assessment should also consider the wider environmental issues (and likely significant environmental effects) associated with waste management within the Newport LDP area. This should include issues associated with landfill and/or other waste disposal methods such as waste to energy facilities which may have both negative and positive environmental effects.	Agreed.	Consideration of the wider issues included in the table.
	Cultural heritage and historic environment – the SA/SEA should also highlight the need to consider any issues associated with the Gwent Levels Historic Landscape and flag the opportunity represented by the ASIDOHL assessment to identify and mitigate for potential significant negative effects.	Agreed.	Detail to be added to table.
	Health – we note and welcome the opportunity, identified by the SA/SEA, to identify ways in which the natural environment can be used to address some health issues.	Noted with thanks.	No further action necessary.
	Physical activity – we would ideally want to see reference to the standards set out in CCW's Accessible Natural Green Space Toolkit.	Noted. However, it is considered that this reference is more appropriate as an indicator in the SAF.	Added to SAF under objective 1. Already included in the sites assessment framework.
	Cycling - we note and welcome the opportunity for the SA/SEA to identify ways in which cycling can be used to promote an active lifestyle and be incorporated into an integrated transport approach.	Noted with thanks.	No further action necessary.
	Households and housing – we note the threats identified in the 2007 local housing strategy and strongly encourage this SA/SEA to attempts to assess these and identify positive mitigations measures to address them where they are likely to lead to negative environmental effects.	Noted. However, it is not the role of the SA to address all of the issues identified. It is regarded that the SA addresses the issues within its remit through the SAF. Mitigation is recommended where appropriate through the use of this framework in the assessment of the LDP.	No further action necessary.

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	Employment growth (land) – the SA/SEA should clearly identify the environmental issues associated with development land allocations particularly significant environmental effects associated with development on green field sites, within or impacting on designated sites such as the Gwent Levels, in flood risk areas, or proposals which will require significant additional water resources or water treatment infrastructure, as well as potential direct and indirect effects on biodiversity.	The environmental issues associated with employment development will be assessed through the SAF.	No further action necessary.
	Tourism – while CCW encourage the use of the natural environment in a positive and pro-active way, both for local residents and visitors to Newport, we also emphasise that it is the role of the SEA to evaluate the potential impacts of such promotion to ensure that it is done sensitively and in keeping with the significant environmental assets that Newport possess. We strongly recommend that the findings of the accompanying HRA are taken into consideration in this section along with the general biodiversity data contained within other sections of this SEA. We would also recommend biodiversity, flora and fauna are included as key SEA topics.	The environmental issues associated with tourism effects will be assessed through the SAF.	The version of the Deposit LDP results includes the integration of recommendations as a result of HRA.
	6 Sustainability Appraisal Framework		
	CCW largely agree that this is a comprehensive set of sustainability objectives which largely cover the range of issues and significant environmental effects likely to be associated with Newport's LDP. We note that there are a very large number of indicators but anticipate that these will be refined to focus on those that measure and respond to the significant environmental effects identified with the delivery of the Plan. We look forward to commenting on these in the later stages of the SEA process, particularly as part of the development of the monitoring framework. Specific recommendations associated with individual objectives are detailed below.	Noted with thanks.	No further action necessary.
	Objective 1 – include reference to Accessible Natural Green Space Toolkit assessment criteria.	Noted with thanks.	Added to SAF under objective 1 as per action above.
	Objective 2 – The number and area of international and nationally designated sites is largely outside the remit and influence of the LDP and is therefore an inappropriate indicator. This may be appropriate for regional and local designated sites, while the sites' "condition" is relevant to all tiers. We are also unsure of the meaning of the target of minimising or halting the replacement of trees which are lost to development and would welcome further clarification.	Noted with thanks.	Further refinement of the targets and indicators undertaken.
	Objective 4 – Note that there may be a requirement to include a general indicator for overall production of NO_x with a target of reducing existing levels depending on the findings of the accompanying HRA. We note that this is included in the following objective (3% reduction target) but should potentially be moved or cross-referenced to this objective for clarity.	Noted with thanks.	SAF Revised in accordance with recommendation.
	Objective 7 – Depending on the findings of the HRA and SEA, there may be a need to include an indicator directly related to sewage treatment capacity.	Noted with thanks.	SAF Revised in accordance with

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			recommendation.
	Objective 8 – While CCW welcome and support the majority of indicators we feel that "increasing water abstraction at source" is both inappropriate and, given that the River Usk and River Wye are the source of most of Newport's water, potentially damaging to these two SACs (subject to the findings of the HRA assessment). Water abstraction should only be increased if it can be shown that there are no adverse effects on any European sites.	Noted.	SAF Revised in accordance with recommendation.
	In addition, the Authority must satisfy itself that any amendments to consents, or likely future consenting regimes, are adequately taken into account by the LDP process, particularly in relation to the proposed levels of growth. It may not be sufficient to assume that water companies or the Environment Agency will have already done this and we strongly recommend that additional measures are taken as outlined below. Newport should continue to engage in consultation with water companies, the Environment Agency, CCW and neighbouring authorities on proposed allocations to enable development to be appropriately located and phased, for example within Water Resource Zones where a sustainable water supply is available and can be secured without adverse effects upon a European site. Development should be avoided where a water deficit has been identified and there are potential likely significant effects on a European site(s). We would encourage the Authority to consider undertaking an exercise such as a Water Cycle Study (appropriate to the issues raised in the Water Resources Management Plan and LDP) to inform the evidence base for the LDP. The information that such a study could provide would also enable consideration of alternative distributions and phasing of development to ensure that the Plan will not be proposing development of such a scale or in a location that will result in adverse effects on the River Usk and/or River Wye SACs. We appreciate that these issues do not affect Newport in isolation and that the LDP is unlikely to be able to address them alone. Working with neighbouring authorities on such a study should help off-set these difficulties to some degree and Hereford Council are already progressing a Water Cycle Study of their own which should help considerably to inform the situation. However, if adverse effects cannot be prevented through avoidance, then Newport will need to show how it might mitigate any potential impacts so that no adverse effect on the integrity of any European site will occur (alone or in combination with other plans and projects). We would, therefore, encourage Newport to consider policy wording similar to that set out in the EIP Report on the West Midlands RSS Phase 2, where the Inspector suggested that; in exceptional circumstances, actual housing allocations may need to be adjusted to fit the available resources. Where there is any doubt, the accompanying HRA should ensure that the LDP contains suitable policies, caveats and conditions to ensure that any development is conditional on assured and sustainable water supplies from sources that would not have an adverse effect on European sites.	Noted. There have been investigations at a regional level into the practicalities of undertaking a Water cycle Study. At present the required information (that including the Review of Consent data) is not available therefore the study cannot be undertaken. Nonetheless the LDP will ensure that policies are included to deal with this important issue.	No further action required at present.
	Objective 19 – We welcome the inclusion of an indicator and target for carrying out ASIDOHLs for	Noted.	SAF Revised in

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	developments affecting Historic landscapes, however, the indicator for ancient woodland should relate to “restoration” rather than simply “area”.		accordance with recommendation.
	7 Testing the Local Development Plan objectives against the SA Objectives		
	7.1 CCW notes the outcomes of this element of the assessment, particularly the large number of conflicts identified between LDP objectives 3 and 4 and the majority of environmental SA objectives. This should highlight the importance of rigorously assessing those strategic policies and candidate sites that seek to deliver these objectives and being particularly aware of ensuring that these policies include suitable caveats and mitigation measures so that any significant environmental impacts are fully addressed (see comments below on section 10 in relation to SP 13 and SP15). This also applies to a lesser extent to objective 6. We also remind you that the SEA requires effects to be considered for their cumulative, ‘in combination’ and synergistic effects. While we appreciate that this is intrinsic to the assessment process to some extent, it would be beneficial to specifically identify where the consideration of these effects has been specifically carried out or influenced a particular assessment outcome. Otherwise, we largely support the recommendations to amend the vision and objectives following the assessment, subject to the following minor points.	Noted with thanks. Predicted cumulative effects of the LDP will be considered at the more detailed assessment stage in the next iteration of the SA.	See Chapter 11 of SAR.
	7.10 While we accept in principle the recommendation for refining the Vision in relation to sustainable development, we strongly recommend that this references the current Welsh Assembly Government Sustainability Scheme “One Wales: One Planet” and not just the “three core pillars of SD”.	Agreed.	SAR updated.
	7.19 Climate change – while we fully support the principle and recommendations made in relation to this objective we would suggest that referring to climate change “adaptation” measures as well as “mitigation” would help clarify the text further.	Agreed.	Further detail is included in LDP policies.
	7.28 Conservation – while we support the recommendation to clarify this objective into 2 separate objectives (which would also aid and simplify the assessment process) we would suggest that additional clarification is needed as to what is meant by “protected and non protected species and habitats”.	Agreed.	Further detail is included in LDP policies.
	7.34 CCW note and welcome the incorporation of the recommended changes into the final LDP Objectives as set out in section 7.33.	Noted with thanks.	No further action necessary.
	7.35 We agree that it should not be necessary to revise the compatibility assessment but given the results of that assessment, we would reiterate our comments on 7.1 in relation to LDP Objectives 3, 4 and 6.	Noted.	Further detail is included in LDP policies.
	8 Developing the Plan options		
	8.3 While we agree that it is not the role of SA or SEA to select the preferred option, it is the function of the SEA to identify the significant environmental effects attached to the various alternatives and, where such effects are identified, to recommend strengthening policies and proposals that enhance positive effects, or identify measures to avoid, cancel or reduce negative effects. It is clear where an option which is assessed as having greater negative environmental effects by the SEA is selected,	The preferred options assessment is not a detailed assessment of the policies, and	See Chapters 10 and 12 of the SAR.

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	then particular attention must be given to how that selection is justified and what measures are proposed to mitigate for those effects. This particularly true for those options which have been assessed as having a high level of uncertainty associated with their potential effects.	therefore it is not necessary to make recommendations for mitigation at this stage, only to predict potential effects. This is due to their strategic nature. Predicted effects are intended to guide detailed policy direction.	
	8.6 We welcome the reference to the accompanying HRA and the commitment to incorporating the results of that appraisal into both the LDP and this assessment process, but recommend that the actual wording is clarified in line with the comments above.	See above. Mitigation is recommended for the appraisal of the Deposit LDP policies.	See Chapters 10 and 12 of the SAR.
	Table 8.1 Assessment Rationale – This is a helpful summary and guide that helps to clarify the application of the assessment process. Please also refer to our comments on table 5.1 and table 6.1.	Noted with thanks.	Changes to SAR to be subsequently incorporated into the assessment rationale.
	Table 8.2 and Appendix C		
	C.1 Housing Numbers. While we follow the rationale why option HN3 is likely to have less negative environmental effects than the other two options, due the lower housing figures (450 housing units per annum), it is not clear in appendix C why option HN1 (800 housing units per annum) and HN2 (600 housing units per annum) are given the same evaluation scores. This would benefit from further clarification and, given that option HN2 is the preferred alternative, further reasoned justification rather than the identical comments made for all three options. Similarly we are unsure how building more houses will lead to greater renewable energy production (SA Objective 11) or increased energy efficiency (SA Objective 10) unless it is a recommended mitigation measure or made clear by detailed policies in the Plan (such as those relating to LDP Objective 2) that these will be requirements of any new housing developments. This element of the assessment would benefit from being cross-referenced to the evaluation against SA objective 13.	Noted.	Detailed assessments of the Deposit LDP policies have now been undertaken and full explanations provided.

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	C.2 Housing Delivery. We concur with the assessment made against SA Objective 1 and 3 that all existing allocations that have not already received planning permission, or are currently subject to the planning process, should be included within this assessment. The assessment against SA Objective 2 is somewhat confusing and we are unclear why HD1 should have a minor positive assessment while HD 2 is given a moderately negative one. While we appreciate that expansion of the city area into the semi-urban margins is likely to lead to more negative pressures that concentrating development on existing allocations and within the city limits, the arguments given in relation to biodiversity protection policies and the results of the HRA would seem to apply equally to all three options. The assessment of HD2 against objective 5 seems to contradict the assessment made against objective 4 but this may just be a need for further clarity as the overall evaluation of the three options against this objective seems reasonable. While we do not necessarily disagree with the assessment of the three options against SD objectives 10 and 11 we do feel that the strongly positive assessment given for HD2 is somewhat subjective and depends on a very strong renewable energy and energy efficiency policies being included in the LDP and implemented for new developments. While we have every confidence this will be the case, it would seem that this would be more straightforward for option HD3, and this seems to be supported by the assessment of the two options against objective 13. We would welcome, therefore, further clarification why there is a difference in the assessment between the two alternatives.	Noted.	Detailed assessments of the Deposit LDP policies have now been undertaken and full explanations provided.
	C.5 Village Development. While we do not necessarily disagree with the conclusions of the assessment of the three options against SA Objective 2, it should be noted that the HRA will only deal with impacts on European and international designated sites. It will not consider national, regional or local sites or any species not listed as features on the sites concerned. Similarly it will not consider aspects such as landscape. The assessment comments should, therefore, be amended accordingly. Similarly, while we largely agree with the assessment outcomes of the three options against the remainder of the environmental SA objectives, we would emphasise that the potential mitigation identified in the assessment tables will be very dependent on the effective drafting and implementation of detailed policies. Given that a hybrid of option V2 and V3 is preferred, then these significant negative environmental effects will need to be addressed in the LDP and we look forward for a clear justification and suite of recommended mitigation measures and policy refinements to be considered in future iterations of this SA report when the detailed implementation of these strategic options is known.	Noted.	Detailed assessments of the Deposit LDP policies have now been undertaken and full explanations provided.
	C.6 Employment. We concur with the assessment of option E1, and to a lesser extent E2, that all existing allocations that have not already received planning permission or are currently subject to the planning process should be included within this assessment. These allocations should not be carried forward to the LDP without such an assessment and the implications of this will need careful consideration if options E1 and E2 are to form part of the preferred strategy.	Noted. Allocations within the plan will be assessed and the planning history of site allocations	No further action required at present.

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		will form part of the assessment process. A comprehensive approach to employment issues is being undertaken, also involving Newport Unlimited, to ensure that allocations are justified and fit for purpose.	
	While we do not necessarily disagree with the conclusions of the assessment of the four options against SA Objective 2, it should be noted that the HRA will only deal with impacts on European and international designated sites. It will not consider national, regional or local sites or any species not listed as features on the sites concerned. Similarly it will not consider aspects such as landscape. The assessment comments should therefore be amended accordingly. While we have every confidence that the final LDP will include policies that effectively implement water quality constraints, we feel that the SA/SEA should help to identify what these might be before assuming that all four policy options will result in positive impacts on water quality. We look forward, therefore for more detailed discussion of this aspect in future iterations of this assessment when more detail on implementation of these strategic options is known.	Noted.	Detailed assessments of the Deposit LDP policies have now been undertaken and full explanations provided.
	C.7 Celtic manor. We are unclear whether or not the production of a Master Plan for the Celtic Manor within the LDP constitutes a meaningful alternative as defined by the Regulations. This is clear when looking at the assessment where, as would be expected, the “produce a Master Plan” option performs significantly better than the “do nothing” option against the majority of the SA objectives. While CCW would support the option of producing a Master Plan for any such development and we appreciate there may not be sufficient detail to assess the Celtic Manor proposals in any meaningful way at the current time, Newport CC must satisfy itself that this strategic option has been adequately assessed by the SA/SEA process. Appendix 6 of the Practical Guide may be of some assistance in the development and assessment of alternatives.	The Celtic Manor exists as a major facility, so many parameters are now set, which limit further options. The requirement for a masterplan will enable the important constraints and considerations to	Detailed assessments of the Deposit LDP policies have now been undertaken and full explanations provided.

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		be clearly set out to inform any future development proposals.	
	C.8 Airport. It is difficult to see how the four alternatives presented for assessment here are meaningful alternatives in relation to the assessment of the Plan's significant environmental effects. The assessment does not appear to be evaluating the significant environmental effects of including some form of airport proposal within the LDP, but attempting to evaluate the various options of supporting or not an airport within the LDP. This results in some options such as the "Do nothing" and "Note and await further information" options appearing to be rather meaningless in terms of the assessment. Overall, the "support" or "not support" options appear to perform as would be expected with the "support" option performing poorly against the environmental SA objectives and reasonably well against the economic and vice versa for the "not support" option with social objectives being neutral or mixed. While we do not necessarily disagree with the conclusions of the assessment, or the selection of the "note the proposals" as the preferred option, we would suggest that Newport CC reconsider how the SEA process may effectively assess a potential aspiration such as this.	The allocation of an airport within Newport is not within the remit of a Local Authority. The plan must therefore clarify how such a request has been deal with.	No further action proposed as the LDP does not have jurisdiction, nor is there sufficient evidence for the appropriate authority to reach any conclusion.
	Identification of preferred options. Housing Numbers 8.11 We note that the recommendation for option HN2 and the marginal nature of this recommendation. While we appreciate the limitations of the data relating to this strategic proposal at the current time, as outlined in our comments above, we feel that the assessment itself would still benefit from further clarification.	Noted.	Detailed assessments of the Deposit LDP policies have now been undertaken and full explanations provided.
	Housing Delivery 8.13 We note that Option HD3 is the recommended option, despite not performing well against the environmental indicators. While we do not necessarily disagree with the recommendation, we do have a number of concerns with this assessment as outlined in our comments above, and we recommend that these are addressed in the next iteration of this report.	Noted.	Detailed assessments of the Deposit LDP policies have now been undertaken and full explanations provided.
	Village Development 8.21 Despite a number of errors in the references to the Habitats Regulations in this element of the assessment (see comments above), we largely concur with the assessment. However, given that V2 and V3 perform less well than V1 against the environmental indicators then the significant negative	Noted.	Detailed assessments of the Deposit LDP policies have now

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	environmental effects associated with these options will need to be addressed in the LDP. We look forward for a clear justification and suite of recommended mitigation measures and policy refinements to be considered in future iterations of this SA report when the detailed implementation of these strategic options is known.		been undertaken and full explanations provided.
	Employment 8.25 Despite a number of errors in the references to the Habitats Regulations in this element of the assessment (see comments above), we largely concur with the assessment. We particularly note and welcome the intention to assess the existing allocations within the SA/SEA.	Noted with thanks.	No further action necessary.
	Celtic Manor 8.28 See comments above in relation to appendix C.7	Noted.	See above.
	Airport 8.33 See comments above on appendix C.8. While we do not necessarily disagree with the assessment, we note that this strategic option does not appear to be included in the preferred strategy. We assume this is the result of the negative assessment of the candidate site in the following section and the subsequent acceptance of the recommendation in 9.26 for the withdrawal of the site. If this is the case, for clarity, this should be noted here.	Noted. The allocation of an airport within Newport is not within the remit of a Local Authority. The plan must therefore clarify how such a request has been deal with.	No further action proposed as the LDP does not have jurisdiction, nor is there sufficient evidence for the appropriate authority to reach any conclusion.
	9 Development of Strategic Sites Note that this element of the assessment should be closely cross-referenced to the findings of the HRA. Our comments are made subject to the findings of that assessment when available.	Noted.	The Deposit LDP subject to SA included revisions as a result of HRA.
	9.4 Candidate site methodology. While we may wish to have seen additional criteria, particularly relating to measures of ecological connectivity or the performance of sites in terms of the environmental goods and services, to reflect some of the developing strategic policies, we feel this is a reasonably detailed and robust assessment methodology.	Noted with thanks.	No further action necessary.
	9.6 While we understand the need to refine the SA criteria for site based assessments, we draw your attention to our comments on Objective 8 of the sustainability appraisal framework above (table 6.1) in relation water resources	Noted.	Detailed assessments of the Deposit LDP policies have now been undertaken and full explanations

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			provided.
	9.9 We welcome the additional indicators which enhance an already thorough and detailed site appraisal. Unfortunately, it is not always easy to see how the assessment of a particular candidate site against the SA objective has been reached (i.e. against which indicators it has performed well/badly) or what the potential mitigation measures for the identified significant negative environmental effects (partial/negative compatibility result) might be. However, we do accept that the detail provided by Table 9.5 does address this to a large extent even if it is not always easy to see how the mitigation proposed directly relates to the significant effects identified.	Noted with thanks.	Detailed assessments of the Deposit LDP policies have now been undertaken and full explanations provided.
	Results		
	The Report should note that this element of the assessment is subject to the results of the HRA.	Agreed.	The Deposit LDP subject to SA included revisions as a result of HRA.
	9.16 We note that Sites 11 (Pirelli), 17 (Ringland) and 38 (28 Retail East) are identified as the most sustainable, despite having some minor incompatibilities with some Objectives.	Noted.	No further action necessary.
	9.18 We note that the assessment identifies that the majority of sites have potential conflicts with objectives 1, 2, 3, 4, 7 and 14. Of particular concern is the performance of these sites against objectives 1 (landscape), 2 (biodiversity), 4 (air quality) and 7 (water quality), and we welcome the recommendation for some of these sites to be removed from the candidate list. We are unsure why some specific sites, mentioned in the Preferred Strategy, such as the educational buildings proposed in the Percoed reen area, do not appear to have been assessed in this section despite their potential impacts on protected sites. It may be that they are incorporated in other candidate sites or will be assessed later when more site specific detail is available, but we would welcome further clarification on this and the wider correlation of this assessment with the preferred strategy elements.	Noted. In the case of the Percoed Reen education site, as an adopted UDP site, this is subject to current consideration by the Education service area.	The Candidate Sites process concentrated on those submitted as such, and no further work is required.
	9.21 Please refer to our separate comments on the HRA report. We welcome the cross reference within this SEA to the provisional findings of the HRA assessment.	Noted with thanks.	No further action necessary.
	Recommendations		
	9.26 We note the 5 sites (site 5 Solutia, site 20 Michaleston, site 21 Marshfield West, site 22 Marshfield East and site 43 Airport) identified as having significant negative environmental effects that it would be difficult, if not impossible, to mitigate for and would, therefore agree with the recommendation not to carry them forward to the preferred strategy.	Noted with thanks.	No further action necessary.
	9.27 We note and welcome the identification of potential avoidance, cancellation and reduction measures to mitigate for the significant negative environmental effects of the candidate sites.	Noted with thanks.	No further action necessary.

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	9.28 We welcome the clear identification of the key environmental impacts that will need to be addressed by any proposed mitigation.	Noted with thanks.	No further action necessary.
	9.29 We welcome the list of potential mitigation measures but note that this list is not exhaustive and does include potential changes to detailed policies to ensure negative effects are avoided. This may be the most appropriate response given the data gaps identified in section 9.30.	Noted with thanks.	Note that the list is not exhaustive to be added.
	9.30 We note and support the additional criteria suggested for SA objective 19.	Noted with thanks.	No further action necessary.
	Table 9.5 Recommendations by site We note and largely support the recommendations for mitigation proposed for the candidate sites.	Noted with thanks.	No further action necessary.
	10 Preferred Strategy Compatibility Assessment		
	10.2 We assume the missing reference in this section refers to Table 10.1.	Noted.	References to be checked throughout document.
	10.3 This is an innovative approach to the assessment process though it does appear to be somewhat complex. It is also not straightforward to see how the strategic policies identified relate to the assessment of the strategic options assessed above, particularly in the case of the policies which directly implement some of the strategic options such as SP 8 housing policy or where there appears to be no strategic policy for a particular option. We recommend, therefore, that you consider including an additional section to show how these two elements of the preferred strategy and the assessment of them in this SA/SEA correlate.	Noted. It has been agreed that the final SAR will include a table to demonstrate the SA findings for each stage with reasoning provided by the LDP team where the most sustainable option has not been carried forward if this is found to be the case.	The SAR includes tables detailing where recommendations have been taken into account in the LDP.
	Table 10.3 Assessment components We are unsure of the purpose of this table.	Noted.	The purpose of the components to simplify the assessment is detailed in the SAR.
	Table 10.4 – Strategic policy compatibility assessment - rationale	Noted with thanks.	No further action

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	This a useful and informative table that will be useful not only in assessing the strategic polices but should help ensure that the mitigation measures identified in previous sections are adequately addressed and incorporated into the strategic and detailed policies.		necessary.
	Table 10.5 LDP preferred strategy compatibility assessment table We note the results of this assessment, particularly the poor performance of the “village development” and “housing numbers” components against a number of environment objectives.	Noted with thanks.	No further action necessary.
	Table 10.6 Assessment Results: Explanations and Recommendations		
	1 Sustainability - We largely agree with the assessment and support the two additional recommendations.	Noted with thanks.	No further action necessary.
	2 Flood risk and water resources – While we largely agree with the assessment and support the two additional recommendations we would also urge you to consider our comments on Table 6.1 Objective 8 above and (subject to the results of the HRA) incorporate appropriate wording to ensure there will be no adverse effects on any European sites as a result of development proposed by the Plan.	Noted.	The version of the LDP assessed included revision made as a result of the HRA.
	3 Green Belt and Countryside – We warmly welcome the clear links made between the quality of the natural environment and countryside and the positive effects this can have on attracting economic investment. We do feel there could be potential conflicts between some aspects of countryside objective and components such as village development, housing, employment etc. as highlighted in the table 10.5, though we also appreciate that these have been mostly identified by this SA/SEA and will depend largely on the detail of any proposals. We welcome and support, therefore, the three recommendations made in this section for further strengthening this aspect of the Plan.	Noted with thanks.	No further action necessary.
	4 Landscape - We largely agree with the assessment and support the additional recommendation.	Noted with thanks.	No further action necessary.
	5 Conservation of the natural and built environment – See comments above on the potential need to clarify national policy with respect to European and international protected sites, particularly in relation to development and water resources (subject to the findings of the HRA). We would, therefore, strongly support the recommendation for additional wording to policy SP7 made here. We also agree with the recommendation to separate the natural and built environment at a strategic policy level and largely support the other recommendations made in this section.	Noted.	See actions above. No further action necessary.
	6 Housing numbers – We note the lack of detail for specific housing allocations and candidate sites and look forward to commenting on any assessment of this aspect of the LDP at the appropriate time. In the interim we would support a recommendation to strengthen environmental policies to ensure any significant environmental effects of strategic allocations are adequately mitigated.	Noted with thanks.	No further action necessary.
	8 Efficient use of land - We welcome and support the recommendation to examine each site for potential biodiversity benefits prior to development and the integration and enhancement of biodiversity value into strategic proposals.	Noted with thanks.	No further action necessary.

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	9 Village development – We note that this component performed poorly against a number of objectives and, therefore, particularly welcome the majority of recommendations but also suggest that the detail of any allocations associated with this component should also be assessed as appropriate.	Noted with thanks. Site specific allocations will be assessed in more detail as necessary as part of the LDP and SA processes.	No further action necessary.
	13 Transport - We note that SP13 raises particular issues in relation to this component and are surprised, therefore, that this component performs as well as it does in the assessment table 10.5. We are particularly concerned that elements of this proposal (such as the eastern extension of the Southern Distributor Road) have not been assessed in detail despite their potential implications on protected sites (such as the Gwent Levels St Brides SSSI) and we anticipate this will be carried out in future iterations of this assessment. In addition, while we acknowledge the largely positive environmental effects associated with SP11, SP12 and SP13 in promoting sustainable transport, we would wish to see further consideration given to the potential significant environmental effects associated with strategic road enhancements in the context of both the Regional Transport Plan and its SEA (SEWTA) and the National Transport Plan.	Agreed.	Detailed assessments of the Deposit LDP policies have now been undertaken and full explanations provided.
	15 Employment – We note the difficulties in correlating the candidate sites to the broad development allocations and we strongly recommend that this uncertainty is addressed in future iterations of this report, particularly in relation to proposals such as those at West Newport at Coedkernew which may have significant negative environmental effects on elements of the Gwent Levels SSSI. With this in mind we largely support the recommendations made but with the clear caveat that further assessment will be required.	Agreed.	Detailed assessments of the Deposit LDP policies have now been undertaken and full explanations provided.
	16 Waste - We note the concerns relating to biodiversity and landscape associated with the identified waste disposal sites, and support the recommendation for further clarity on potential usage and requirement for more detailed assessment as appropriate. We also largely support the other recommendations, particularly the recommendation for greater clarity in policies relating to reduction in waste to landfill.	Noted with thanks.	No further action necessary.
	11 Next Stages We note the clear setting out of the remaining stages of the SA/SEA process and look forward to commenting on the documents at the appropriate time.	Noted with thanks.	No further action necessary.
Caldicot &	**Table 8.1**		

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Wentloog Levels Internal Drainage Board (IDB)	Objective 2 We welcome the reference to 'connectivity' and to the reinstatement and enhancement of natural linear features/habitats in this section. The network of reens and hedgerows on the Gwent Levels is a significant consideration in this context. The Board is keen to play a full and active part in this Objective.	Noted with thanks.	No further action necessary.
	Objective 9 We support the principle of a diverse approach to Flood Risk Management and are pleased to see this taken forward as an Objective in its own right. However this is a complex issue and there is a need to have proper regard to the communities that occupy and farm areas of low lying land alongside the Severn Estuary, particularly the Gwent Levels. These communities have a 2000 year old history of winning and protecting land from the sea, it would be a tragedy not to recognise this and the importance of the unique historic landscape created by this process. Any decisions on Flood Risk Management need to be made in full recognition of this critically important part of Newport's heritage. Similarly the issue of coastal squeeze needs to accommodate this heritage of sea defence works. Finally it might be useful in this section to make reference to the Flood Risk Regulations 2009 transposing the Floods Directive in England and Wales. and the Flood and Water management Bill which covers these issues and will be enacted in the LDP preparation period.	Noted.	Detailed assessments of the Deposit LDP policies have now been undertaken and full explanations provided.
	Objective 19 We very much welcome the inclusion here of the Historic Landscape of the Gwent Levels	Noted with thanks.	No further action necessary.
	Component 2. Flood Risk and Water Resources We fully support the rationale and recommendations here.	Noted with thanks.	No further action necessary.
	Component 4. Landscape We fully support the proposal here for a management plan for SLAs and the inclusion of the potential effects of development.	Noted with thanks.	No further action necessary.
	Component 5. Conservation of the Natural and Built Environment We fully support the points made in the third bullet point and in particular the mapping of nature conservation designations, creation and management of links, green infrastructure and SUDs in relation to Flood Risk Management.	Noted with thanks.	No further action necessary.
	Sustainability Baseline issues We are very pleased to see the inclusion here to Local Food Production and the points made here are very relevant to our interests and work on the Gwent Levels and the potential to serve the major surrounding conurbations.	Noted with thanks.	No further action necessary.
	table 5.1		

Respondent	Comments	Response	Action
	Local Food Production. We welcome the inclusion and recognition of Local Food Production and the references to links with habitat and landscape protection and management and the need to promote the benefits to urban populations,	Noted with thanks.	No further action necessary.
	Landscape. We fully support the points made here and particularly the references to the importance of the Historic Landscape - a point which is particularly relevant to the Gwent Levels.	Noted with thanks.	No further action necessary.
	Flood Risk and Water Quality. We welcome the points made here and particularly the reference to the importance of SUDs in enhancing biodiversity and amenity. These points are very relevant to developments in the lower lying areas of Newport's hinterland.	Noted with thanks.	No further action necessary.
	Table 6.1		
	The Board particularly welcomes the inclusion of these Objectives in the Sustainability Appraisal Framework and the general approach taken here. Our comments on each Objective are as follows: 1 and 2 - We feel these Nature Conservation and Biodiversity Objectives are particularly relevant to the Gwent Levels and hope to be able to make a significant contribution to the objectives through our conservation works generally and through the Board's Biodiversity Action Plan for the Drainage District.	Noted with thanks.	No further action necessary.
	9 - We welcome the inclusion of this Objective, the commitment to minimise the risk of and from flooding and the Board is keen to play a full part in this an in particularly with the objective and target relating to SUDs	Noted with thanks.	No further action necessary.
	19 and 20, We believe these objectives relating to historic environment and the cultural history of Newport are particularly relevant to the Gwent Levels and again the Board looks forward to playing a full and active part in attaining relevant objectives and targets.	Noted with thanks.	No further action necessary.
Environment Agency Wales	LDP Vision We recognise and welcome comments made in the section titled trends, issues and preferred options, which aims to protect the natural and built environment…tackling energy consumption and waste production, reducing pollution, enhancing and protecting biodiversity and addressing flood risk management and the challenge of climate change. We are supportive of your Vision with a focus on natural environment. We also recognise a key challenge for your Local Authority in the preparation of its LDP will be to balance the objectives of your Strategy, minimising the sustainability impacts arising from increased population and employment growth, and manage the accompanying social, economic and environmental changes, including adapting towards climate change and managing risks of flooding.	Noted with thanks. This is a comment for the LDP.	No further action necessary.
	A Sustainable and Deliverable Strategy We are also supportive of the strategy in striving to be sustainable, it does not allocate large	Noted with thanks. This is a comment	No further action necessary.

Respondent	Comments	Response	Action
	greenfield sites as there are substantial areas of brownfield land available for development, in accordance with Government guidance which advises that previously developed (or brownfield) land should, wherever possible, be used in preference to greenfield sites". In meeting Objectives 1 on Sustainable Use of Land and Objective 4 on Housing, you recognise that a key way in which your Plan will seek to meet this objective is by focusing development on previously used, brownfield sites.	for the LDP.	
	We are supportive of your Plan in aiming to protect the natural built environment (paragraph 2.3 of the Preferred Strategy). Paragraph 2.57, provides comments that currently, there are brownfield sites available in Newport with a capacity of about 10,200 dwellings on sites of 10 or more units and Appendix 1 identifies 1500 dwellings on greenfield sites. Potential brownfield sites for inclusion in the Plan include Llanwern Regeneration Sites (Glan Llyn), former Whiteheads Steelworks site and the adjacent Monmouthshire Bank Sidings site, various sites, including the Old Town Dock in the south, and Crindau to the north. The Strategy identifies that the former Llanwern Steelworks could contribute to 4000 new homes. This would make a significant contribution to the projected 9600 dwellings required in Newport by 2026. Potential Greenfield sites include Llanwern Village (1,100 dwellings) and the northern end of the former Tredegar Park Golf Course (150 dwellings). We are of the view that the Strategy does not clearly define what is to be considered as a large scale Greenfield site and this should be defined to provide further clarity. We also raise the question as to whether all Greenfield sites need to be included.	Noted with thanks. The deposit plan will clearly set out those greenfield site allocations which are deemed appropriate. The large greenfield sites mentioned (Llanwern Village and former Tredegar Park Golf Course) have planning permission.	Further greenfield sites will be very limited, so further action not required.
	In terms of meeting the house building requirement forecast of 9600 dwellings requirement by 2026, we welcome comments made in the summary of the Preferred Strategy and paragraph 2.56 (referring to brownfield development capacity) that "land for these dwellings needs to be provided in locations that are both sustainable and deliverable".	Noted with thanks. This is a comment for the LDP.	No further action necessary.
	Environmental, Viability and Deliverability Issues In terms of sustainability and deliverability we would expect that all options and sites to be assessed against environmental criteria and taken forward only where they has been assessed as being suitable. Where environmental concerns cannot be overcome then such development options should not be taken forward. We wish to expand further on environmental issues raised in our representations.	Noted with thanks. This is a comment for the LDP.	No further action necessary.
	Water Management We also refer to the SEA Directive 'Water' theme. The LDP should look to managing water as a whole. The overarching aim of the EU Water Framework Directive (WFD) is to achieve an integrated system of water protection, improvement and sustainable use. All aspects of water, including water quality, quantity and flow (surface and groundwater), water supply and capacity, wastewater	Noted with thanks. This is a comment for the LDP.	No further action necessary.

Respondent	Comments	Response	Action
	treatment and flood risk should be considered. Their impact on biodiversity interests is also relevant. Clarity is sought on relevant matters in our representations enclosed.		
	Water Availability and Wastewater Infrastructure It is essential that there is evidence to demonstrate that suitable infrastructure exists, both water and wastewater in the Plan period to ensure the delivery of a sustainable strategy and development options. In areas where there is limited available capacity discussions with Dwr Cymru/Welsh Water should take place by your Authority to ascertain whether improvements can be implemented to ensure delivery options in the Plan period. We would also wish to be assured through an evidence based approach that there is no adverse environmental impact as a result of proposals or measures can be put in place to overcome concerns identified.	Noted with thanks. DwrCymru/ Welsh Water have been consulted and have provided information This is a comment for the LDP.	Many of the sites now have planning consent, and further work not required, but the matter will be kept under review.
	Strategic Flood Consequence Assessment (SFCA) Flooding/flood risk has been identified as an environmental issue and also a strategic issue in your LDP consultation documents. As we have advised in previous correspondence (including our response dated 3 December 2009 to your SEA/SA Scoping Report) and as discussed at our meeting of 8 October 2009, the Environment Agency recommends a strategic flood consequence assessment (SFCA) is undertaken by your local planning authority (LPA). We trust our operational guidance (which we have previously sent to you) will inform matters. The SFCA should assess whether suitable options for mitigation and compensation exist to ensure risks and consequences of flooding be managed down to an acceptable level and whether such options are realistic and can be implemented. A SFCA will also identify and assess flooding from all known sources, including groundwater flooding, flooding from drainage systems and flooding from infrastructure failure (including reservoirs and sewers). We also suggest that other parties are consulted on your SFCA, including Sewerage Undertake (Dwr Cymru/Welsh Water) and your own Engineers department. The outcomes of such assessment and discussions will contribute to having a robust evidence base and may have implications in the Plan through selection of options, allocations, Plan comments, policies and annotations. In terms of risks and consequences of flooding, the outcomes of the SFCA may demonstrate that only part of land is suitable for development. Proposals may need to be phased or developer contributions may be required to allow the development to proceed. As already advised, we would be pleased to assist you through this iterative process and continue our liaison in regard to the SFCA. We would expect a SFCA to be part of the deposit plan consultation, forming part of the evidence base and/or supporting information, informing policies and proposals. We would welcome the chance to review the final SFCA in advance of your deposit plan and request sufficient time is allowed for review.	Noted with thanks. A SFCA is now complete.	To be considered by the LDP Team.
	Shoreline Management Plans and Catchment Flood Management Plans	Noted with thanks.	To be considered

Respondent	Comments	Response	Action
	We also note that the Shoreline Management Plans and Catchment Flood Management Plans will be considered in the SFCA process (paragraph 2.7 of the Preferred Strategy). We also wish to make you aware that the Severn Estuary SMP2 – Lavernock Point to Haw Bridge, Gloucester to Anchor Head consultation has been subject to public consultation (ended 5 January 2010). The consultants are currently drafting a response to the issues raised and presenting the consultation findings, with the report aiming to be finalised by the end of March 2010. In addition, consultation on our draft Severn Estuary Flood Risk Management Strategy (SEFRMS) is due April-May 2010. This Strategy provides the economic case for investment, defines defence alignments and the optimum standard of protection for flood cells.	These strategies are being considered by the LDP team.	by the LDP team. SMP also considered in PPP review.
	Areas Susceptible to Surface Water Flooding (AStSWF) On 2 November 2009 date we wrote to your Authority enclosing information and guidance on surface water mapping in the Newport area. Our advice is that this should form part of your baseline data for your LDP and should be included in your SA. The surface water maps are indicative and their use is in highlighting areas where additional investigative work of surface water flooding may be appropriate, and such detailed considerations should subsequently inform you as to the implications for your Plan, informing the development of policies, section of options, sites and allocations. We would also recommend that other appropriate bodies, such as your drainage engineers are consulted. It may be necessary for a drainage assessment to be carried out. You may also wish to use this information when preparing a SFCA.	Noted with thanks. The most up to date information has been supplied to the consultants undertaking the SFCA.	SFCA considered as part of the SA.
	Our Experience of Examination in Public (EIP) of a LDP We anticipate that Planning Inspectors may ask each local planning authority how they have taken surface water flooding into account, including evidence and whether the outcomes from such discussions and investigations will affect deliverability of the Plan. Surface water flooding, revisions in the development advice maps; use, adoption and maintenance of sustainable drainage systems are being considered as part of Examination in Public (EIP) of Merthyr Tydfil's Local Development Plan. Our understanding from this EIP suggests that the 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 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 options (proposals and sites) being considered in your Preferred Strategy and ISAR are suitable for inclusion.	Noted. All candidate sites are being assessed as part of the SFCA even if they have planning permission.	SFCA considered as part of the SA.
	We also recommend that you consider cross boundary issues relating flooding risk and discussions with neighbouring authorities as this was relevant at an EIP. We highlight that Cardiff City Council	Noted. All candidate sites are	SFCA considered as part of the SA.

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	have recently completed Stage 1 and 2 of their SFCA as part of their LDP process. Part of the spatial area that their SFCA covers includes areas within Newport's administrative boundary, in particular, areas around Marshfield and the Gwent Levels. We therefore recommend that you consider the information contained in that SFCA as it may be of use to you in undertaking your own SFCA. It may also help to inform your decision on whether some of your candidate Sites are suitable for allocation. Cardiff's SFCA is available as a LDP supplementary background paper from their website from the following link: http://www.cardiff.gov.uk/content.asp?nav=2870,3139,3154,5845,5846,5847,5848&parent_directory_id=2865&id=9354	being assessed as part of the SFCA even if they have planning permission.	
	Table 5.1 presents the analysis of Key Sustainability Issues and Opportunities. We suggest this heading should read land affected by contamination.	Agreed.	Heading modified.
	Our advice is that development proposed on land known or strongly suspected of being contaminated to be subject to a Preliminary Risk Assessment (PRA), prior to determination of a planning application. A PRA should form part of a planning application submission. We welcome inclusion of policies in the forthcoming Deposit Plan to ensure submission prior to determination. We suggest that you also consider the cost implications of remediation of sites, in order to ensure that your Plan's proposals are deliverable. Any prospective developer should be aware of such costs and be able provide the local planning authority with a level of certainty that such works can achieve the standard of remediation required and be implemented within an agreed timescale. We suggest that an implication for the Plan is to encourage development proposed on land known or strongly suspected of being contaminated to be subject to a Preliminary Risk Assessment (PRA), prior to determination of a planning application.	Noted. This is an issue for the LDP team. The predominant brownfield focus to the LDP strategy will need to be supplemented by a clear policy to ensure that contamination is dealt with accordingly.	Land contamination is subject to its own legislation whose requirements must be met, and the LDP will not need to repeat these. Likely remediation costs will be included in viability assessments.
	For completeness and ease of reading our representation relates to the issue as a whole relating to **Water Resources for the ISAR**.		
	Page 10, SA Objective 8 We note that there is an Environmental SA Objective 8 "To reduce water consumption".	Noted.	No further action necessary.
	Page 39-54, Section 3, Table 3.2 Sustainability Themes linked to final SA Objectives. Table 3.2 presents the relationship between the final SA Objectives and Sustainability Themes, implications for LDP, links with plans, policies and programmes and SEA topic areas.	Noted.	No further action necessary.
	The 'Water' theme should look to managing water as a whole. The overarching aim of the EU Water Framework Directive is to achieve an integrated system of water protection, improvement and sustainable use. All aspects of water, including water quality, quantity and flow (surface and groundwater), water supply and capacity, wastewater treatment and flood risk should be considered. Their impacts on biodiversity interests are also relevant.	Noted.	The way that water is addressed in the SAR reviewed and revised as

Respondent	Comments	Response	Action
			appropriate. Added to PPP review updates.
	As your Authority is aware, we consider that water availability is potentially a key issue which you should address in your LDP, SA and HRA. Whilst the sources listed under themes “Protect and enhance Biodiversity” and “Reduce pollution of watercourses, groundwater and improve water quality” relate to water resource documents this does not relate directly to this issue. Reference is made to water abstraction and the River Usk, however no mention is made in relation to the River Wye SAC. There are no themes which directly relate to water resources or the reduction of water use. We recommend a separate theme for inclusion in regard to sustainable use of water resources that includes using water more efficiently. We suggest conserving water resources and reducing water usage”. This would provide a logical link to your SA Objective 8 to reduce water consumption. We also suggest that this water efficiency theme crosses other themes under "Improve energy efficiency of housing" and "Use all resources wisely".	Noted.	The way that water is addressed in the SAR to be reviewed and revised as appropriate. Added to Stage A updates.
	Page 39-54, Table 3.2, column National/Regional Plans, Policies and Programmes: In addition those sources listed, we refer you to our representations with regard to Plans, Policies and Programmes for your review. These documents relating to water resources could be added to your list (national and regional).	Noted.	See actions relating to recommended PPPs.
	Page 39-54, Table 3.2 Implications for your LDP/SA: We suggest that implications for your LDP/SA may include;		
	Determining the extent to which water resource issues, (supply, capacity and phasing issues) affects the viability and deliverability of your Plans proposals. In addition, we advise that proposals including site allocations should only be proposed where evidence demonstrates that sufficient water exists to supply development in the future. We suggest that sites be tested for suitability against water availability and impact; does suitable provision exist or where improvements are needed can this be delivered through developer contributions/levy. Dŵr Cymru/Welsh Water should be consulted.	Noted. It is not the role of the SA to determine the infrastructural capacity of sites. Dwr Cymru/Welsh Water has been consulted.	This information should be provided to the SA team by the Council for consideration in the assessments.
	Consideration of the impact of climate change on water resources. Dŵr Cymru/ Welsh Water published a draft water resources management plan in January 2009, which included the impact of climate change on water resources. However, since the draft was published, new climate change data has become available (UKCP09) and, therefore, the final plan may be significantly different from the draft. Dŵr Cymru/ Welsh Water draft plan is available at: http://www.dwrcymru.com/English/Company/Operations/resources/wrmp/index.asp .	Noted.	Draft version of plan added to Stage A updates.
	Policies to ensure there is no adverse impact on River Usk and Wye designated features as a result of any adverse impact on water resources.	Noted. These features will be	No further action necessary.

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		protected through the objective to protect biodiversity and thus it is unnecessary to include them twice.	
	Policies should also seek to reduce water consumption and encourage water efficiency measure; allow for water conservation measures to be incorporated in new development (water saving devices, schemes to harvest and re-use rainwater, collection treatment and reuse of grey water); encourage sustainable drainage systems; encourage drought resistant/low water use landscaping schemes; encourage network of green infrastructure.	The SA themes table is to summarise the requirements of the PPPs reviewed. This issue is included in the SAF.	No further action necessary.
	To encourage development to meet standards under Code for Sustainable Homes/EcoHomes/BREEAM	The SA themes table is to summarise the requirements of the PPPs reviewed. This issue is included in the SAF.	No further action necessary.
	Page 56, Section 4, Paragraph 4.11, Environmental Data Under Section 4 “The Environmental, Social, Economic and General Baseline Characteristics for Newport, environmental data has been collected for a list of indicators.	Noted.	No further action necessary.
	Consideration should also be given to CAMS, river basin management plans and private water supplies. In terms of analysis the following should be included;	Agreed.	River Usk CAMS already included. Severn River Basin Management Plan added to Stage A.
	Dŵr Cymru/Welsh Waters' South East Conjunctive Use System (SEWCUS) resource zone provides water to the area of Newport. There are many sources used to supply this zone and they cover a wider area of South East Wales. There are many water sources used to supply this zone including abstraction from the rivers Usk and Wye. Both of these rivers are designated as Special Areas of Conservation (SAC) under the European Habitats Directive. We are undertaking a final assessment	Noted. There have been investigations at a regional level into the practicalities of	No further action required pending receipt of abstractions consents

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	of abstraction licences under our Habitats Directive Review of Consents on the Rivers Usk and Wye between now and March 2010. Development within the Newport area may have an impact upon the amount of water being abstracted from these rivers. The Council needs to obtain information from Dŵr Cymru/Welsh Water on the implications of the Habitats Directive assessments on supply to Newport. Dŵr Cymru/Welsh Water's draft water resources management plan is available on its website: http://www.dwrcymru.com/English/Company/Operations/resources/wrmp/index.asp	undertaking a Water cycle Study. At present the required information (that including the Review of Consent data) is not available therefore the study cannot be undertaken. Nonetheless the LDP will ensure that policies are included to deal with this important issue.	information.
	Following a review of information from Dŵr Cymru/Welsh Water, we suggest that a way forward in understanding more about water management, which may have resultant implications for your Plan would be to undertake a Water Cycle Study. This Study would enable you to learn more about the issues surrounding water supply and disposal in Newport. In addition, water cycle studies enable planning for water more sustainably by: bringing together partners and stakeholders to share information, bringing together all water and planning evidence under a single framework; understanding the environmental and physical constraints to a development; and identifying a water cycle strategy to help all parties plan for a more sustainable water environment. We suggest that this could form part of your evidence base, thus supporting your SA in establishing whether water availability/supply is an issue and its extent, and the outcomes of which will inform your LDP and may enable you to provide a plan for the implementation of water services infrastructure. Please see link below for further full guidance on water availability studies. While the guidance refers to the whole water cycles, you may be able to extract relevant parts relating to supply and disposal. Please note, whilst much of this guidance is England-based it is useful in explaining the benefits of undertaking a Water Cycle Study, and how it should be carried out. Environment Agency: Water Cycle Studies http://www.environment-agency.gov.uk/research/planning/33368.aspx http://www.environment-agency.gov.uk/research/planning/33368.aspx	Noted. There have been investigations at a regional level into the practicalities of undertaking a Water cycle Study. At present the required information (that including the Review of Consent data) is not available therefore the study cannot be undertaken. Nonetheless the LDP will ensure that policies are	No further action required pending receipt of abstractions consents information.

Respondent	Comments	Response	Action
		included to deal with this important issue.	
	Page 59-77, Section 5, Identifying Key Sustainability Issues		
	Table 5.1 presents the results of analysis for key sustainability issues. As raised in comments above, focus should be on water management as a whole. Whilst we recognise that water quality has been raised, water availability, management and usage should also be identified as a potential key sustainability issue for Newport. Please refer to implications for the LDP in the above comments.	Agreed.	See actions above.
	Additionally, in terms of groundwater resources, the major part of the area is underlain by a secondary aquifer and these should be protected from adverse impacts. These aquifers can provide modest amounts of water but the nature of the rock or the aquifers structure limit their use. They remain important for rivers, wetlands and lakes and some private supplies in rural areas. There are some important outcrops of principal aquifer consisting of Carboniferous Limestones in the eastern part of Newport although these are limited in extent. Principal aquifers provide significant quantities of water for people and may also sustain rivers, lakes and wetlands.	Noted.	Detail added to key sustainability issues.
	We note your reference to the Source Protection Zone (SPZ). There is one SPZ (Great Spring) that falls across the boundaries of Newport's Authority Area covering an area of approximately 12 square miles, which will influence proposals to the East of Newport. In terms of the implications for development, please note that there may be restrictions on certain activities within these areas. Further information is available at the Environment Agency website: http://www.environment-agency.gov.uk/homeandleisure/37833.aspx. Any policies or proposals, which include polluting activities, should be limited in this area; this is a resultant implication for your LDP. You may also wish to consider reviewing our Groundwater Protection Policy "Underground, under threat, Groundwater Protection: Policy and Practice Parts 1-4" (This is available from our website: http://www.environmentagency.gov.uk/research/library/publications/40741.aspx).	Noted.	Detail added to key sustainability issues.
	We would also suggest that water efficiency should be linked to energy efficiency in the home. A number of water efficiency measures will also help to reduce energy consumption	Agreed.	Detail added to key sustainability issues.
	Page 82, Section 6, Table 6.1, Sustainability Appraisal Framework		
	The SA Framework is presented in Table 6.1 with SA objectives, indicators and targets. Whilst we support SA objective 8 'to reduce water consumption' we are concerned at the target of increasing 'water abstractions at source'. Our Habitats Directive Review of Consents has established that some local areas are already over abstracted or over licensed. Consideration should be given to reducing the number and size of existing abstractions. If the local authority means that it supports local abstractions rather than water supply from Dŵr Cymru/Welsh	Noted.	See actions and comments above relating to the same issue.

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	Water then direct abstractions from the local environment would need a licence from the Environment Agency. Please refer to the Usk and Ebbw and Lwyd CAMS documents for more information.		
	We suggest that per capita consumption (water use per person per day) should be included as an indicator for reducing water consumption because this would be the most suitable indicator for reducing water consumption instead of "Add water abstractions as an indicator".	Agreed.	SAF Revised in accordance with recommendation.
	Section 8, Developing the Plan Options: In developing Plan Options (Section 8 of ISAR), adequacy of infrastructure and water considerations is provided in the rationale for housing, however, this may need to be extended in the rationale for other types of development proposals such as employment or separated out following your considerations.	Agreed.	The adequacy of infrastructure has been a consideration in the LDP and the SA.
	Section 9, Development of Strategic Sites: Forty-six strategic sites were assessed to demonstrate compatibility with the SA process and are presented in Table 9.1. This includes assessment against Objective 7, which includes detailed criteria on whether a candidate site has adequate water and sewerage infrastructure? This is supported by us and should be linked logically in your consultation documents. It is not clear to us why Objective 8, reduction in water consumption was not considered in assessment?	Agreed.	The adequacy of infrastructure has been a consideration in the LDP and the SA. Detailed policies have now been assessed to consider sites and water consumption.
	Paragraph 9.27, comments that "potential conflicts for other sites may be, to a certain degree, mitigated through the implementation of the LDP policies that will seek to reduce the effects of development on environmental and socio-economic considerations." Whilst this is true, for a site to be allocated its must be tested for suitability and there must be a level of certainty that options for mitigation are available and can be implemented to overcome those constraints in the Plan period. Otherwise the Plan may fail in delivering its objectives and proposals. Prior to identifying whether a site is suitable for inclusion in the Plan, impacts on water availability and its effects must be a consideration. Such findings may also indicate where developer contributions may be required. The will inform subsequently inform policies and provide reasoning for such policies.	Agreed. See comments above.	See comments above. Changes to the SAR will be made throughout the subsequent stages as necessary.
	In relation proposal for an Airport, we advise that your Authority consult with Dŵr Cymru/Welsh Water to confirm whether there is water available to supply any proposed airport. If the proposal features plans to abstract water from the local area, we would be concerned because of the proposals proximity to the Caldicot Levels which is a Site of Special Scientific Interest (SSSI).	Agreed. See comments above.	See comments above. Changes to the SAR will be made throughout the subsequent

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			stages as necessary.
	Please refer to our advice given in the above section because the outcomes of your considerations and work may subsequently result in changes to your LDP and associated documents. This may alter the ISAR, including changes to key sustainability issues and implications, SA objectives (indicators and targets), rationale and development of strategic sites. There may also be implications for the deliverability of your Plan's proposals.	Agreed.	The SAR will be revised as a result of the actions above as appropriate. Subsequent changes to other stages in the report will be considered as necessary.
	On page 42 the theme relating to flooding should also makes reference to consequences in addition to risk.	Agreed.	Modification to themes table.
	We recommend that you clarify the wording in the “Implications for the LDP” column. We suggest inclusion of; Policies should prevent sensitive development in identified flood risk areas. Policies should safeguard against increased risk of flooding to the development and elsewhere, unless the risks and consequences of flooding are demonstrated as being acceptably managed.	Agreed.	Modifications to themes table.
	Page 42, Table 3.2, column National/Regional Plans, Policies and Programmes: In addition those sources listed, we refer you to our representations with regard to Plans, Policies and Programmes because we advise that you review a number of documents relating to the theme of flooding could be added in your list (national and regional).	Noted.	See actions on PPPs. Changes to the SAR have been made throughout the subsequent stages as necessary.
	Page 39-54, Table 3.2 Implications for your LDP/SA:		
	Page 56, Section 4, Paragraph 4.11, Environmental Data Under Section 4 “The Environmental, Social, Economic and General Baseline Characteristics for Newport, environmental data has been collected for a list of indicators. In terms of analysis your SFCA should also be a useful source of data.	Noted.	SFCA considered in assessments where relevant.
	Page 62, Section 5, Identifying Key Sustainability Issues, Flood Risk and Water Quality Table 5.1 presents the results of analysis for key sustainability issues. As raised in comments above, focus should be on water management as a whole. The consequences of flooding should also be referenced under this issue. In terms of implications for the LDP, policies should prevent sensitive	Noted. It is considered that flood risk is covered adequately in the	See actions above. Changes to the SAR have been made

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	development in identified flood risk areas. Policies should direct development away from areas at high risk of flooding towards areas where flooding is less of an issue. Policies should also safeguard against increased risk of flooding to the development and elsewhere, unless the risks and consequences of flooding are demonstrated as being acceptably managed.	key issues table, although if changes are made with regard to the consideration of water, this will be modified as necessary.	throughout the subsequent stages as necessary.
	Page 82, Section 6, Table 6.1, Sustainability Appraisal Framework The SA Framework is presented in Table 6.1 with SA objectives, indicators and targets. Whilst we support SA objective 9 'to minimise the risk of and from flooding'. The consequence of flooding is also an important consideration. We suggest the following indicator: •% of developments approved in C1 and C2 development advice map zones against the advice of the Environment Agency.	Noted.	SAF Revised in accordance with recommendation.
	Section 8, Developing the Plan Options and Section 9, Development of Strategic Sites: We refer to our advice in regard to the Strategic Flood Consequence Assessment; TAN15 advice that requires a precautionary framework to be applied setting out the positive steps to promote development in Zones A and B; justification for development and assessment to demonstrate that the consequences of flooding have been understood and are capable of being managed in an acceptable way.	Noted.	See actions above. Changes to the SAR will be made throughout the subsequent stages as necessary.
	Proposed Changes Please refer to our advice given in the above section because the outcomes of your considerations and SFCA work may subsequently result in changes to your LDP and associated documents.	Noted.	See actions above. Changes to the SAR will be made throughout the subsequent stages as necessary.
	For completeness and ease of reading our representation relates to the issue as a whole relating to **WasteWater.**		
	Wastewater The 'Water' theme should look to managing water as a whole. The overarching aim of the EU Water Framework Directive is to achieve an integrated system of water protection, improvement and sustainable use. All aspects of water, including water quality, quantity and flow (surface and groundwater), water supply and capacity, wastewater treatment and flood risk should be considered.	Noted.	See actions above. Changes to the SAR will be made throughout the subsequent stages as

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			necessary.
	Pages 33-38, Section 3, ISAR review of plans, policies and programmes: Table 3.1 provides a list of relevant plans, policies and programmes reviewed as part of the SA. We recommend that as part of the SA and LDP process, Dŵr Cymru/Welsh Water's Asset Management Plan (infrastructure providers' investment programmes and strategies) should be reviewed, in consultation with them. This would help you to inform the collation of baseline information, which should be included in analysis.	Noted.	Water Resources Management plan draft added. Changes to the SAR will be made throughout the subsequent stages as necessary.
	Page 39-54, Table 3.2 Sustainability Themes linked to final SA Objectives. Table 3.2 presents the relationship between the final SA Objectives and Sustainability Themes, implications for LDP, links with plans, policies and programmes and SEA topic areas. The 'Water' theme should look to managing water as a whole. To reiterate the overarching aim of the EU Water Framework Directive is to achieve an integrated system of water protection, improvement and sustainable use. All aspects of water, including water quality, quantity and flow (surface and groundwater), water supply and capacity, wastewater treatment and flood risk should be considered. Their impacts on biodiversity interests are also relevant.	Noted.	See actions above. Changes to the SAR will be made throughout the subsequent stages as necessary.
	Page 39-54, Table 3.2, column National/Regional Plans, Policies and Programmes: In addition those sources listed, we refer you to our representations with regard to Plans, Policies and Programmes because we advise that you review a number of documents relating to wastewater, which could be added in your list (national and regional).	Noted.	See actions on PPPs. Changes to the SAR will be made throughout the subsequent stages as necessary.
	There are no themes which directly relate to wastewater. This issue could put under a separate theme or combined with "Reduce pollution of watercourses, groundwater and improve water quality".	Agreed.	Wastewater to be added to themes or under new water heading.
	We suggest that implications for your LDP/SA may include; preventing deterioration in water status/improve water status by ensuring suitable waste water	Agreed.	Detail added to table where

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	infrastructure is provided; to determine suitability and adequacy of infrastructure provision, phasing and capacity requirements which impinges on viability and deliverability, of proposals; how does provision match with the LDP proposals, and without having an adverse environmental impact? In testing potential sites for suitability against provision and impact; are proposals viable and deliverable (or need to be phased) in the Plan period, with no adverse environmental impact. Does suitable provision exist or where improvements are needed can this be delivered through developer contributions/levy.		appropriate.
	We recommend a separate theme for inclusion in regard to sustainable use of water resources that includes using water more efficiently. We suggest conserving water resources and reducing water usage". This would provide a logical link to your SA Objective 8 to reduce water consumption. We also suggest that this water efficiency theme crosses other themes under "Improve energy efficiency of housing" and "Use all resources wisely".	The SA themes table includes themes that have arisen from the PPP review.	Stage A updated and included in SAR.
	Page 56, Section 4, Paragraph 4.11, Environmental Data Under Section 4 "The Environmental, Social, Economic and General Baseline Characteristics for Newport", environmental data has been collected for a list of indicators. Consideration should also be given to sewerage catchment areas and river basin management plans.	Noted.	Stage A updated and included in SAR.
	Page 59, Section 5, Key Sustainability Issues and Opportunities: We suggest that from such investigations the SA/LDP may alter, including analysis and identification of key sustainability issues.	Agreed.	Changes to the SAR will be made throughout the subsequent stages as necessary.
	Comments in Table 5.1 (page 70) under the heading of 'social' and 'Households and housing' identifies that the 2007 Local Housing Strategy has an ageing sewerage system and is a threat. An implication for the LDP is to ensure sewerage arrangements are suitable. However, this should not be solely confined to social housing. The adequacy and suitability of existing infrastructure, and the need for additional facilities, should be taken into account for different types of development. We reiterate that further discussions with Welsh Water/Dwr Cymru should take place to identify the extent to which sewerage infrastructure would be an environmental and social issue, which in turn may influence the SA Objectives identified and affect the delivery of your Plans proposals (e.g. housing and employment).	Noted. This is an issue for the LDP team in the first instance.	See actions above. Changes to the SAR will be made throughout the subsequent stages as necessary.
	Section 6, SA Framework: The SA Framework is presented in Table 6.1, where twenty-seven SA Objectives are listed. Through your discussions with DCWW and investigations, should you decide that capacity of existing infrastructure and the need for additional facilities is an issue it may be necessary to include an additional SA objective or amend an existing SA objective potential indicators and targets.	Agreed.	Stage A updated and included in SAR.

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	Section 8, Developing the Plan Options: In developing Plan Options (Section 8 of ISAR), adequacy of infrastructure is provided in the rationale for housing, however, this may need to be extended in the rationale for other types of development proposals such as employment or separated out following your considerations.	Noted. This is an issue for the LDP team in the first instance. It is agreed that the SA rationale should reflect this comment	The adequacy of infrastructure has been included in the B3/4 assessments.
	Section 9, Development of Strategic Sites: Forty-six strategic sites were assessed to demonstrate compatibility with the SA process and are presented in Table 9.1. This includes assessment against Objective 7, which includes detailed criteria on whether a candidate site has adequate water and sewerage infrastructure? This is supported by us and should be linked logically in your consultation documents.	Noted with thanks.	No further action necessary.
	Paragraph 9.27, comments that "potential conflicts for other sites may be, to a certain degree, mitigated through the implementation of the LDP policies that will seek to reduce the effects of development on environmental and socio-economic considerations." Whilst this is true, for a site to be allocated its must be tested for suitability and there must be a level of certainty that options for mitigation are available and can be implemented to overcome those constraints in the Plan period. Otherwise the Plan may fail in delivering its objectives and proposals. Prior to identifying whether a site is suitable for inclusion in the Plan, disposal of wastewater must be a consideration in order to establish whether any existing wastewater infrastructure can absorb a development or identify that new infrastructure is required, which must be planned for and where developer contributions may be required. The will inform subsequently inform policies and provide reasoning for such policies.	Noted. See comments above in response to comments regarding the identification of adequate infrastructure. This is an issue for the LDP team in the first instance. The LDP will have policies to ensure that adequate infrastructure is in place prior to development. Dwr cymru/Welsh Water have been consulted and provided comments.	The adequacy of infrastructure has been included in the B3/4 assessments.
	Table 9.1 comments that some candidate sites have proposed a septic tank. We wish to advise that	Noted. See	See actions

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	the provision of private foul drainage within a sewered area, even as a temporary measure (i.e. pending connection to the public foul sewer) is contrary to Environment Agency policy and therefore could be considered as unacceptable. Such proposals would also conflict with the requirements of Planning Policy Wales (March 2002) and Welsh Office Circular 10/99. PPW and Welsh Office Circular 10/99 adopts a hierarchical approach is in place, whereby the first presumption must always be to provide a system of foul drainage discharging into a public sewer (this should be done in consultation with the Sewerage Undertake for that area). A lack of capacity or plans to improve capacity in the sewer is not a valid reason for a sewerage undertaker to refuse connection under Section 106 of the Water Industry Act 1991 and we may refuse to Consent to Discharge for private treatment facilities in such circumstances. Development proposing the use of non-mains drainage schemes will only be considered acceptable where connection to the main sewer is not practicable or feasible. A full and detailed assessment is required for non-mains drainage proposals in accordance with Welsh Office Circular 10/99.	comments above in response to comments regarding the identification of adequate infrastructure. This is an issue for the LDP team in the first instance.	above. Changes to the SAR will be made throughout the subsequent stages as necessary.
	Please refer to our advice given in the above section because the outcomes of such work may subsequently result in changes to your LDP and associated documents. Dŵr Cymru/Welsh Water should be fully consulted on the adequacy of sewerage infrastructure and we suggest that Dŵr Cymru/Welsh Water's Asset Management Plan be reviewed as part of the SA process. The outcomes may alter the ISAR, including changes to key sustainability issues and implications, SA objectives (indicators and targets), rationale and development of strategic sites. There may also be implications for the deliverability of your Plan's proposals.	Noted. See comments above in response to comments regarding the identification of adequate infrastructure. This is an issue for the LDP team in the first instance.	See actions above. Changes to the SAR will be made throughout the subsequent stages as necessary.
	Table 3.1 provides a list of relevant plans, policies and programmes reviewed as part of the SA. We recommend that you review a number of further plans, policies and programmes relating to water resources. We also recommend that Dŵr Cymru/Welsh Water be consulted. Dŵr Cymru/Welsh Waters' South East Conjunctive Use System (SEWCUS) resource zone provides water to the area of Newport. There are many sources used to supply this zone and they cover a wider area of South East Wales. Therefore, we consider that you should take into account plans from areas extending some distance beyond the immediate boundaries of your Authority. We also recommend that Dŵr Cymru/Welsh Water be consulted. We recommend that you review a number of further plans, policies and programmes relating to water resources be reviewed, as listed below. This may be also prove useful as a source of evidence for your LDP. It must be recognised that the findings and outcomes of your assessment work may result in further changes to these consultation documents and subsequent LDP documentation.	Noted. See list of PPPs below.	See below.

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	We recommend that you review a number of further plans, policies and programmes relating to water resources as part of the LDP/SA/HRA process, the outcomes of which may result in changes to your LDP:		
	• The current plans of other local authorities (Vale of Glamorgan, Bridgend, Powys, Rhondda Cynon Taff, Forest of Dean and Merthyr Tydfil) need to be consulted to understand the regional pressures on water resources. This is because these areas are supplied by the same DCWW SEWCUS water resources zone. It may be useful to discuss with other local authorities their approach to this issue to ensure that suitable and adequate water is available to deliver all authorities development plan proposals. • Dwr Cymru Welsh Water's draft Water Resources Management Plan http://www.dwrcymru.com/English/Company/Operations/resources/wrmp/index.asp. • Consideration of the impact of climate change on water resources. Dŵr Cymru/ Welsh Water published a draft water resources management plan in January 2009, which included the impact of climate change on water resources. However, since the draft was published, new climate change data has become available (UKCP09) and, therefore, the final plan may be significantly different from the draft. • Environment Agency: Water Resources Strategy for Wales http://www.environment-agency.gov.uk/research/library/publications/40731.aspxhttp://www.environment-agency.gov.uk/research/library/publications/40731.aspx • Environment Agency: Water for People and the Environment. Water Resources Strategy for England and Wales http://www.environment-agency.gov.uk/research/library/publications/40731.aspx • Environment Agency: Catchment Abstraction Management Plans (CAMS) http://www.environment-agency.gov.uk/business/topics/pollution/33376.aspx In particular the Ebbw and Lwyd CAMS (including the Wentlooge levels and an area of water availability issues at Basseleg Weir) and the Wye CAMS in addition to the Usk CAMS should be considered. • Environment Agency: River Basin Management Plan (RBMP) http://www.environment-agency.gov.uk/research/planning/33250.aspx • Environment Agency: Habitats Directive Review of Consents http://www.environment-agency.gov.uk/business/regulation/31915.aspxhttp://www.environment-agency.gov.uk/business/regulation/31915.aspx • Severn Estuary/Gwent Levels/Tidal Usk Strategies • The River Usk Strategy produced by your Authority, dated November 2008. • Shoreline Management Plans and Catchment Flood Management Plans	Noted. See list of PPPs below.	PPPs reviewed and included where appropriate. Subsequent stages of SA revised as appropriate.

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	• draft Severn Estuary Flood Risk Management Strategy (SEFRMS • We note that the Shoreline Management Plans and Catchment Flood Management Plans will be considered in the SFCA process (paragraph 2.7 of the Preferred Strategy). We also wish to make you aware that the Severn Estuary SMP2 – Lavernock Point to Haw Bridge, Gloucester to Anchor Head consultation has been subject to public consultation (ended 5 January 2010). The consultants are currently drafting a response to the issues raised and presenting the consultation findings, with the report aiming to be finalised by the end of March 2010. In addition, consultation on our draft Severn Estuary Flood Risk Management Strategy (SEFRMS) is due April-May 2010. This Strategy provides the economic case for investment, defines defence alignments and the optimum standard of protection for flood cells. • Environment Agency Salmon Action Plans. (website: http://www.environment-agency.gov.uk/research/library/publications/33967.aspx)) • Environment Agency: River Basin Management Plan (RBMP). http://wfdconsultation.environment-agency.gov.uk/wfdcms/en/severn/Intro.aspx • The River Usk Strategy produced by your Authority, dated November 2008. • Technical Advice Note 5 Nature Conservation and Planning, which was published in September 2009. • Ministerial Interim Planning Policy Statement (MIPPS) 01/2009 Planning for Sustainable Buildings (May 2009). • Environment Agency: Dealing with Contaminated Land in England and Wales. www.environment-agency.gov.uk/research/planning/40409.aspx. You may wish to consider this guidance. In summary, this guidance encourages the polluter, landowner or other responsible person to remediate land of their own accord, or expects that land is remediated through re-development through an application under the Town and Country Planning system or other appropriate regulatory approach. • At a European level you may wish to review LCP (Large Combustion Plant) and IPPC (Integrated Pollution Prevention and Control) Directives or the forthcoming Industrial Emissions Directive (IED) in consideration of air emission. This will ensure that your Plan is consistent with current and forthcoming national and international policy on industrial emissions to air.		
	WASTE		
	Table 6.1 Sustainability Appraisal Framework		
	We are supportive of Environmental SA Objective 12, which states "Promote the reduction of waste generation and landfill, and increase levels of recycling to achieve more sustainable waste management". The targets, however, identified for this objective only reference the year 2010. These	Agreed.	See below.

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	targets have already been met. We therefore suggest that you set targets for the future and this is explained in the next section.		
	Table 3.1 provides a list of relevant plans, policies and programmes reviewed as part of the SA. We note you include the 2002 document, Wise about Waste, produced by WAG. Please note that the updated version is called "Towards Zero Waste". This is currently in draft consultation; we recommend that you review the draft and consider using the final version, once published. If you are not using “Towards Zero Waste”, then we seek reasoning and recommend that you should explain the reasons for such exclusion in your SEA/SA.	Noted. See list of PPPs below.	PPPs added and subsequent stages of SA revised as appropriate.
	The toughest diversion targets set in WAG’s draft “Towards Zero Waste” strategy (WAG 2009) come around 2012/13, 2015/16, 2019/20 and 2024/25. The majority of these targets will be within the Plan period and we recommend that you use these in your Plan. We suggest that you should also consider how growth and development aims can be met whilst at the same time meeting these targets.	Agreed.	SAF targets updated.
	The table states “By 2020 max waste arising per person should be less than 300kg per annum”. It is not clear whether this is a target from the document “Wise About Waste: The National Strategy for Wales” (WAG, 2002). You should be aware that “Towards Zero Waste” (in draft, WAG, 2009) states a max of 210kg of residual household waste per inhabitant per annum by 2019/20. You should therefore clarify where your target of 300kg stems from, whether it is realistic and deliverable, and whether it refers to residual household waste or all waste from householder (before it is separated for recycling etc). We would appreciate clarification on this point.	Agreed.	SAF targets updated.
	We are unclear what is meant by your indicator “% municipal waste used to recover heat/energy”. We recommend that you clarify what technology range this target refers to (for example, Anaerobic Digestion, Incineration etc). We note that no target has been identified. When deciding on a target, please be aware that there is a cap on the amount of waste that can be sent to Energy from Waste plants (incinerators) of 42% by 2015/16, decreasing to 36% by 2019/20. You should ensure that any targets that you set do not conflict with these national targets. We suggest two additional indicators/ targets, which flow from “Towards Zero Waste: •% of waste reused. Target: 0.8% by 2019/20. Working towards this target also has social benefits; in that it includes third sector involvement (reuse of local authority waste is mostly coordinated and run by these groups). •% level of waste sent to landfill. Target: 10% by 2010. This is easily measured through waste returned.	Agreed.	SAF updated.
	Table 5.1 presents the analysis of Key Sustainability Issues and Opportunities. The analysis does not appear to be sufficient to address the needs of Newport’s future waste management requirements. While we recognise the need to improve recycling rates through the local development plan (LDP), we also recommend that you seek to ensure that sustainable management of residual waste is addressed through the emerging LDP. It is our understanding that Newport has very limited facilities	Noted.	See below.

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	available for disposal and treatment of waste. According to our current data, there are no operational landfills within Newport, and the landfills you currently send waste to have severely limited capacity with imminent closure predicted. We consider that the LDP presents an opportunity for the development of appropriate waste infrastructure development. In addition, Newport contains the greatest producers of hazardous waste in South East Waste due to presence of the Eco-Oil facility. We suggest that you could aim to build on your current skills and technology base and encourage green waste technology treatment companies into the area. The development of appropriate sustainable waste management infrastructure should therefore be added as an implication for the LDP.		
	The LDP should comply with the requirements of the South East Wales Regional Waste Plan (RWP) 1st Review (March 2008) and associated assessment requirements. This RWP contains capacity requirements for each waste stream by Local Authority Area and the LDP should therefore demonstrate how these requirements will be delivered. The RWP and Technical Advice Note 21 Waste advise that each local planning authority should determine actual locations of proposed waste management facilities and make provisions for these in their LDPs. As part of the evidence base for your LDP, you should bring together the technological and spatial elements of the RWP for Newport. You should calculate your predicted arisings, existing and pipeline capacities, required new capacity and calculate the number and type of new facilities required, land area needed and shortfall that the LDP needs to address. This data should form part of your evidence base in order to ensure that the LDP is founded on robust and credible evidence. Through the LDP/SA process, we will seek assurance from you that you have considered these requirements, ask on how options were chosen and how the Plan will deliver such requirements.	Noted. This is an issue for the LDP team in the first instance. The LDP and Waste Background Paper will set out how the land requirements established in the RWP 1st Review will be met. This will be a combination of site specific allocations and a general B2 industrial land approach, consistent with the guidance set out in TAN 21.	This is considered in the latest version of the LDP.
	We therefore suggest the following additional wording to Table 5.1, with our reasoning as explained above:		
	Key issues/Opportunities Waste: Newport currently has very limited facilities available for the treatment and disposal of waste. There are no operational landfills within Newport and the landfills that Newport currently sends waste that cannot be recycled to are predicted to close imminently. Newport contains the greatest producers of	Agreed.	Key issues table reviewed and information about waste issues added as

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	hazardous waste in South East Waste due to presence of the Eco-Oil facility. With the aim of building on current skills and technology base, green waste technology treatment companies should be encouraged into the area.		suggested.
	Implications for the LDP: The LDP should demonstrate how the requirements of the South East Wales Regional Waste Plan will be delivered. Allocations for waste management facilities for all relevant waste streams should be included in the LDP.	Agreed.	Key issues table reviewed and information about waste issues added as suggested.
	Table 10.6 Assessment Explanation and Recommendations Recommendations of the Preferred Strategy Compatibility Assessment are shown in table 10.6. The waste component assessment recommends that the intention to reduce waste going to landfill through increasing the capacity for sustainable waste management is made clearer in the policy. The ISAR also comments that sites for sustainable waste management should be shown on the proposals map of Preferred Strategy map, showing how sustainable transport measures have also been taken into consideration (proximity principle). The assessment recommends that the policy could include the potential for the generation of energy from waste. The policy could also reference the requirement relating to the use of secondary and recycled aggregate for construction in policy SP10 (Minerals) and add a requirement for construction waste management plans to be developed for all new development. The above recommendations have not been incorporated into the Preferred Strategy. We recommend that the Preferred Strategy be amended to reflect the recommendations of the SA.	Noted. It is understood that the recommendations from the SA will be incorporated into the next stage of the LDP.	LDP team to consider.
	Sustainability Baseline and Key Issues Representation We refer to the non technical summary, which briefly summarises key issues. Waste is identified as a key issue with reference to the potential to improve recycling rates. This has placed an emphasis in the SA on recycling. We wish to highlight that the waste hierarchy should be followed and the first step of the waste hierarchy is reduction, a target for which is included in Towards Zero Waste and which Newport will have to meet. We also recommend that you seek to ensure that sustainable management of waste is addressed through the emerging LDP, which is supported through your evidence base and assessment of waste. We therefore suggest the following additional wording "There is the potential to improve recycling rates and opportunity to ensure sustainable management of all types of waste".	Agreed.	This is now included.
	Table 3.1 provides a list of relevant plans, policies and programmes reviewed as part of the SA. We recommend that you review our Groundwater Protection Policy "Underground, under threat, Groundwater Protection: Policy and Practice Parts 1-4".	Noted. See list of PPPs below.	PPPs reviewed and included where

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	We recommend that you review our Groundwater Protection Policy "Underground, under threat, Groundwater Protection: Policy and Practice Parts 1-4" and include in your list of relevant plans, policies and programmes given in Table 3.1. (This is available from our website: http://www.environment-agency.gov.uk/research/library/publications/40741.aspx)		appropriate. Subsequent stages of SA revised.
	CANDIDATE SITES		
	We note that Table 9.1 of your ISAR contains a number of large sites, and that some of these are also included in your Preferred Strategy document as development options. We provide advice environmental issues associated with each of these major sites in turn, and suggest information we would expect to be submitted, should your Authority decide to take forward the sites in the Plan to test suitability. Please note that we provide guidance on your Strategic Flood Consequences Assessment (SFCA) and all Candidate Sites (cSites) in a separate representation.	Noted.	No actions necessary.
	Candidate site 1654.C1 - Proposed Severnside Airport, Newport We would expect any proposals for an airport to be accompanied by sufficiently detailed studies setting out the environmental effects expected and proposing effective migratory measures. We would welcome the opportunity for further discussions in this regard. We note that the southern part of the site extends into the Severn Estuary. We have the following concerns:	Noted. This is a consideration for the LDP team in the first instance. Findings of additional work should be integrated into the SA following this work. The allocation of an airport within Newport is not within the remit of a Local Authority.	The allocation of an airport within Newport is not within the remit of a Local Authority. This is no longer a consideration in the SA.
	Flood risk: As your Authority is aware, the proposed allocation lies within zone C1 as defined by the development advice maps (dam) referred to under TAN15. Our Flood Zone maps also confirm that the site is at risk of flooding. In order to establish whether the site is suitable for allocation, your Authority should be satisfied that the risks and consequences of the proposed use can be acceptably managed. Therefore, the site should be assessed as part of your SFCA. An airport in the Severn Estuary could affect the flooding regime, depending on how the airport is situated in relation to the sea defences. There could be a negative effect on risk and consequences of flooding to the existing communities	Noted. The allocation of an airport within Newport is not within the remit of a Local Authority. The plan must therefore clarify	No further action proposed as the LDP does not have jurisdiction, nor is there sufficient evidence for the appropriate

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	located within the extensive defended tidal floodplain. An airport would potentially affect the passage of ebb and flow within the tidal cycle of the Bristol Channel. Again this would be dependent on the layout and size of the airport and the extent to which it would extend below the low water mark. From a flood risk perspective, there could be opportunities to provide improvements to the existing flood defences along the coastline, as a result of development associated with the airport, and this is something we would welcome the opportunity to provide further advice on. Biodiversity: The Severn Estuary has a suite of conservation designations, as you are aware. The Severn Estuary is a designated SPA, cSAC, SSSI and a designated Wetland of International Importance (Ramsar site). The Habitats Regulations are therefore relevant. We would expect any proposals to include appropriate mitigation for any damage to the Estuary. Fisheries: We regulate migratory salmonids in coastal waters. Adult fish returning to the Rivers Wye and Severn swim through the Severn Estuary and this would have implications for the location of any runway extending out into the Estuary. We would expect appropriate studies to be undertaken in this regard in order to establish the extent to which the runway would have an impact on fish, and how any impact could be mitigated for. Please note that the Marine Bill gives us additional powers / duties regarding other migratory fish species (all featured under the conservation designations). These too are likely to be present in the vicinity of the proposed development. We currently have the Sea Fisheries Committee responsibilities within the estuary so have a duty to preserve marine fish species – the area is a known nursery and feeding ground for certain species. We would expect appropriate studies to be undertaken in order to establish the nature of impact on these species of fish, and appropriate mitigation to be set out. Land drainage: An airport would have the potential to impact on land drainage of the low lying inland area. We would recommend consultation with the IDB in this regard. Water resources: We recommend you consult with DCWW to confirm whether there is water available to supply any proposed airport. If the proposal featured plans to abstract water from the local area, we would be concerned because of the proposal's proximity to the Caldicot Levels. The Caldicot Levels is a water dependent SSSI, and any development should not have an adverse impact on the water levels in the SSSI. We agree with the comments made in the ISAR on how an airport would have significant negative effects on the environment (Table 8.2 and paragraphs 8.29 to 8.33), and agree with the conclusions that adequate and realistic mitigation needs to be available before deciding whether the proposals should be taken forward.	how such a request has been dealt with.	authority to reach any conclusion.
	Llanwern – Glan Llyn – Candidate site 1466.C1 Our current position on the proposed allocation is as follows: Flood risk: As your Authority is aware, the proposed allocation lies within zone C1 as defined by the development advice maps (dam) referred to under TAN15. Our Flood Zone maps also confirm that	Noted. Detailed assessment is applicable at the planning	No further work proposed as this will be dealt with by planning

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	the site is at risk of flooding. The site should also be assessed as part of your SFCA, and the information produced by consultants may help to inform your SFCA with regards to this site. We are aware that the site benefits from planning permission (06/0471). We are aware that a FCA has previously been produced, which appeared to demonstrate that the risks and consequences of flooding could be acceptably managed. However, since the production of the FCA in 2005, subsequent flood prevention works to the east bank of the River Usk have reduced the likelihood of the likelihood of a breach at that location. Consultants acting on behalf of the applicant approached us last year to discuss the updated flood modelling to assess the effect of this on the Llanwern site. We advised and sought clarity on a number of points relating to the proposed updated modelling. We have not received any updated model and FCA to date. Surface water disposal: In addition, we would expect to see evidence to demonstrate that surface water disposal can be regulated in such a way as to minimise flooding and pollution. As part of the planning application, attenuation ponds acting as surface water regulation were proposed. We support this SuDS approach taken by the developer. We are aware that St Modwen (the developer) currently intends to dispose of their surface water via balancing ponds, which then dispose of water into the adjacent Corus surface water disposal system, which subsequently discharges to the Severn Estuary. We understand that the developer is currently in discussions with Corus in order to develop an alternative means of surface water disposal. This should be agreed prior to the site being allocated. Remediation of contaminated land: We would expect remediation of the site to be agreed and completed to the satisfaction of the LPA in conjunction with ourselves. Biodiversity: The site is located adjacent to a designated area of importance for nature conservation and a SSSI. Appropriate studies should be undertaken and options put forward in order to demonstrate that impact on biodiversity could be mitigated for. Pollution prevention and foul drainage: We understand that the developer intends to dispose of foul water to the existing sewerage treatment plant at Nash. However, from our discussions with DCWW, we are aware that the existing treatment plant would not have the capacity to cope with increased flows arising from the proposed development. We strongly recommend that you seek advice from DCWW to discuss this and to determine whether upgrades to the foul drainage system are possible. You should ensure that sewerage capacity is in place before the allocation is made, order for the allocation to be deliverable and realistic.	application stage, the development plan will ensure that the policy framework is developed so that critical issues such as those noted are dealt with accordingly.	consents.
	Llanwern – Existing steelworks – Candidate sites 1420.C1, 1669.C1 and 3.29 Flood risk: As your Authority is aware, the proposed allocation lies within zone C1 as defined by the development advice maps (dam) referred to under TAN15. Our Flood Zone maps also confirm that the site is at risk of flooding. We note that these sites do not benefit from previous planning permissions. Detailed assessment	Noted. Detailed assessment is applicable at the planning	No further work proposed as this will be dealt with by planning consents.

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	would be required as part of the SFCA, which should consider whether mitigation is possible. The SFCA may need to demonstrate whether it is possible to offset the loss of flood storage in order to ensure that there is no increase of flooding elsewhere up to the 0.1% tidal flood event. This is particularly relevant to cSites 1420.C1, which we note covers an area of previously undeveloped land. We would expect these sites to be assessed in detail in the SFCA and options for mitigation assessed prior to a LPA decision to take this Candidate Site forward in the Plan. The SFCA in considering options will need to demonstrate whether it is possible to offset the loss of Flood Storage and demonstrate no increase of flooding elsewhere, up to the 0.1% flood event. Surface water disposal: In addition, we would expect to see evidence to demonstrate that surface water disposal can be regulated in such a way as to minimise flooding and pollution. Remediation of contaminated land: We would welcome the opportunity for the remediation of land through the development process. The site lies adjacent to a SSSI and is subject to a heavy industrial use. Hence, the risks to controlled waters are high. However, we consider that the risks to controlled waters could be controlled through the submission and implementation of an acceptable PRA and remediation strategy. We would be pleased to enter into discussions with a developer in order to advise on remediation at the site. Biodiversity: The site is located adjacent to a designated area of importance for nature conservation and a SSSI. Appropriate studies should be undertaken and options put forward in order to demonstrate that impact on biodiversity could be mitigated for. Contaminated surface water run-off and foul water disposal: We would expect a suitable drainage system to accompany any detailed design proposals. We welcome the use of SuDS wherever possible, and where it has been demonstrated that there is no resultant risk to controlled waters. We recommend that any development at this site connect to mains, and recommend that you contact DCWW to ensure that sufficient capacity exists, in order to ensure that as an allocation this site can be delivered	application stage, the development plan will ensure that the policy framework is developed so that critical issues such as those noted are dealt with accordingly.	
	Uskmouth/ Sloblands – Candidate site 1673.C1 and Uskmouth/ Sloblands – Candidate sites 1674.C1 Flood risk: As your Authority is aware, a large proportion of these sites lie within zone C1. Our Flood Zone maps also confirm that the site is at risk of flooding. The site should be assessed in your SFCA. Surface water should also be assessed. The site lies adjacent to the Julian Reen which is designated as a Main River, and as such, we would request a 7m buffer zone be left between the Reen and the proposed development for access and maintenance purposes. Land affected by contamination: We consider this site to be sensitive, as is it situated on a historic landfill site, and lies close to the River Usk, which is designated as a SSSI and SAC. A risk assessment and remediation strategy should be undertaken, in order to protect controlled waters, and	Noted. Detailed assessment is applicable at the planning application stage, the development plan will ensure that the policy framework is developed so that critical issues such	No further work proposed as this will be dealt with by planning consents.

Respondent	Comments	Response	Action
	remediation standards may be higher than in other urban areas, due to the site's location. However, we anticipate that remediation would be possible at this site and would welcome that this is controlled through the planning process. Foul water disposal: We would expect a suitable drainage system to accompany any detailed design proposals. We welcome the use of SuDS wherever possible, and where it has been demonstrated that there is no resultant risk to controlled waters. We recommend that any development at this site connect to mains foul sewer, and recommend that you contact DCWW to ensure that sufficient capacity exists. You should ensure that sewerage capacity is in place before the allocation is made, in order for the allocation to be deliverable and realistic.	as those noted are dealt with accordingly.	
	Tredegar Park Golf Course (candidate site 1445.C1, 1602.C1 and 28.C1) As your Authority is aware, the proposed candidate sites lie within zone C2 as defined by the development advice maps (dam) referred to under TAN15. Our Flood Zone maps also confirm that the area is at risk of flooding. The River Ebbw runs through the sites and is designated under the Water Resources Act 1991 as a statutory main river watercourse. On 22 March 2007 the Welsh Assembly Government Planning Decision Committee allowed joint appeals (APPEAL A G6935/A/05/1186037 (PG/SAD/03/1763) and APPEAL B G6935 /A /05/1193193 (PG/05/1203)) regarding Tredegar Park Golf Course, Sports Field and Recreation Ground. Both appeals were determined on basis of flooding issues and the Planning Committee concludes that in this particular case the reduction in flood risk offered by the proposals is such that it outweighs the possible future benefits arising from refusing new development on the land. We refer your Authority to these previous appeals in relation to this site, where previous information on risk and consequences of flooding may inform your SFCA. The scheme is still progressing and mitigation works are yet to be agreed. To demonstrate commitments in your Plan, the requirements of TAN15 should be considered by your local planning authority and assessed as part of your SFCA. Up to date information and guidance may need to be considered.	Noted. This is a consideration for the LDP team in the first instance. Findings of additional work should be integrated into the SA following this work. Detailed assessment is applicable at the planning application stage, the development plan will ensure that the policy framework is developed so that critical issues such as those noted are dealt with accordingly	Action for LDP team in the first instance
	Llanwern Village (para 2.65) (candidate site 250.C1) Flood risk: The northern parts of the site (i.e. the portions of the site north of the A48) lie predominantly within zone C2 and our Flood Zone maps confirm that the site is at risk from flooding.	Noted. Detailed assessment is	No further work proposed as this will be dealt with

Respondent	Comments	Response	Action
	A small part of the southern part of the site lies within zone C2 and our flood zone maps. We agree with the comments contained in the ISAR that the part of the site that is within zone C2 should not be developed and that green infrastructure should be provided to include SuDS. We note that the sites benefits from planning permission 06/0845 and that an FCA was submitted with the application which demonstrated that the risks and consequences of flooding could be managed at that time. This FCA may be used to inform your SFCA. Protection of watercourses: Please note that we request a 7m buffer zone is left between any proposed development and the Monks Ditch (designated a Main River) for access and maintenance purposes. We note that a number of ordinary watercourses run through the site. In order to preserve the connectivity of river corridors, we would advise that appropriate buffer zones be left alongside the watercourses. Our advice is that watercourses are left as open channels and not culverted as part of development. Foul drainage: We recommend that you consult with DCWW to ensure that sufficient sewerage capacity exists to cope with the proposed development, in order for the allocation to be deliverable and realistic.	applicable at the planning application stage, the development plan will ensure that the policy framework is developed so that critical issues such as those noted are dealt with accordingly	by planning consents.
	Whitehead Works Site (para 2.57) (cSite 232.C2) We recently commented on a draft SPG for this site (our letter dated 04 December 2009, our ref: SE/2009/111781/01-L01), and our advice in response to that SPG regarding flooding remains relevant, should your Authority decide to take forward this allocation. In brief, our concerns are as follows: Flood risk: As your Authority is aware, the site lies within zone C1. A up-to-date FCA should be produced, and the site should be included in your SFCA. The SFCA should explore whether the site is suitable for allocation, and whether mitigation can ensure that the risks and consequences of flooding can be acceptably managed. As part of this process, you should assess: •How the risks and consequences of flooding can be managed to an acceptable level in the T1000 flood event; •Whether current poor performance of the surface water drainage system should be improved; •How development should be located sustainably on site to ensure that risks and consequences of flooding are acceptably managed, i.e. buildings are directed away from areas at greatest risk of flooding. Land affected by contamination: We understand that a ground investigation contract has been undertaken to inform the remediation programme for most of the site. In February 2008 we met with and provided guidance to the consultants who had undertaken the Phase 2 site investigation (Opus International). We would be pleased to review further reports submitted in the regard, or to provide	Noted. Detailed assessment is applicable at the planning application stage, the development plan will ensure that the policy framework is developed so that critical issues such as those noted are dealt with accordingly	No further work proposed as this will be dealt with by planning consents.

Respondent	Comments	Response	Action
	further guidance as the remediation programme as this progresses. It is essential that necessary works and any monitoring are agreed with relevant parties in advance of their implementation. This is to ensure there is no adverse impact to controlled waters. Biodiversity: As you are aware, the site lies 1km from the River Usk SAC, as designated under the Habitats Regulations. The development should therefore not impact adversely on this designated site. You should consult Countryside Council for Wales (CCW) further in this regard. We would expect appropriate ecological surveys to be carried out and appropriate mitigation proposed. Foul drainage: We understand that the proposals include connection to mains foul sewer. You should consult with DCWW to ensure that there is adequate capacity in the sewer to cope with additional flows arising from the proposed development, in order for the allocation to be deliverable and realistic. Water resources: We suggest that you consult with DCWW to ensure that sufficient water is available to supply the proposed development		
	Monmouthshire Bank Sidings site (para 2.57) (cSite 198.C1) Flood risk: The site lies outside of zone C and outside of our Flood Zone maps. However, it should still be assessed as part of your SFCA in order for all types of flooding to be assessed. Land affected by contamination: Our advice is that no development should commence on site until the remediation of the site has been undertaken and an acceptable verification report has been submitted. Biodiversity: As you are aware, the site lies 1km from the River Usk SAC, as designated under the Habitats Regulations. The development should therefore not impact adversely on this designated site. You should consult Countryside Council for Wales (CCW) further in this regard. We understand that a Phase 2 ecological survey report was produced in 2006 and was submitted in support of the planning application. We would recommend a walkover ecological survey and report to supplement the earlier work. Foul drainage: We understand that the proposals include connection to mains foul sewer. You should consult with DCWW to ensure that there is adequate capacity in the sewer to cope with additional flows arising from the proposed development. Water resources: We suggest that you consult with DCWW to ensure that sufficient water is available to supply the proposed development.	Noted. Detailed assessment is applicable at the planning application stage, the development plan will ensure that the policy framework is developed so that critical issues such as those noted are dealt with accordingly	No further work proposed as this will be dealt with by planning consents.
	We provide the following general advice the relevant to cSites where appropriate: • We advise that all sites should be assessed in your Strategic Flood Consequences Assessment (SFCA). We provide further advice on the SFCA process in a separate representation. • If the site lies within a Area Susceptible to Surface Water Flooding (AStSWF), then this should be taken account of in your Strategic Flood Consequences Assessment (SFCA). We have recently sent you maps of Areas Susceptible to Surface Water Flooding (AStSWF). We emailed information about how to access the maps and guidance on how to use them to you	Noted. A SFCA is being undertaken using the most up to date information and shall inform the plan. Dwr Cymru/ Welsh Water have	No further action proposed.

Respondent	Comments	Response	Action
	in November 2009. As we stated to you in the letter attached to that email, we anticipate that Inspectors may ask each Local Planning Authority how they have taken surface water flooding into account and whether it will affect deliverability of the Plan. It may be necessary for a drainage assessment to be carried out. SuDS should be included where appropriate. We would also recommend that other appropriate bodies, such as your drainage engineers are consulted. • For areas where we have no records of fluvial or tidal flooding, we advise that you check with your drainage engineers as they may hold information about localised flooding problems. • Our advice is that watercourses are left as open channels and not culverted as part of development. Please note that should culverting or diverting of channels be proposed, then prior formal Flood Defence Consent (FDC) will be required from ourselves. FDC is unlikely to be granted for culverting works, except for access purposes. • Please note that we request a 7m buffer zone is left between any proposed development and any Main River for access and maintenance purposes. Should any works or development be proposed within the channel of the main river or within 7m of the river bank, then prior FDC will be required from ourselves. • When a site lies adjacent to the Monmouthshire and Brecon Canal, we recommend that British Waterways be consulted. • We recommend that you consult with DCWW to ensure that sufficient sewerage capacity exists to cope with the proposed development, in order for allocations to be deliverable and realistic. • We recommend you consult with DCWW to confirm whether there is water available to the proposed allocations, in order for them to be deliverable and realistic.	been consulted.	
	Table 9.1		
	Remediation of land affected by contamination We welcome the remediation of land through the planning process. We note that a number of candidate sites are situated on brownfield land, subject to a previous industrial use. We would expect suitable studies to be submitted, including suitable risk assessments, site investigations and remediation strategies, where appropriate. Land should be fully remediated before any development takes place.	Noted. The predominant brownfield focus to the LDP strategy will need to be supplemented by a clear policy to ensure that contamination is dealt with accordingly.	This is considered in the SAR.
	Biodiversity	Noted.	This is considered

Respondent	Comments	Response	Action
	We note that a number of cSites are situated on areas of Greenfield land, which are important as wildlife corridors and areas of habitat connectivity. This applies to the following sites in particular: 1665.C1: Developing this site would result in loss of the wildlife corridor between Malpas and Caerphilly. The corridor is important as it links the Rivers Usk and Llwyd. 117.C1 and 1117.C1: Developing this site would reduce the wildlife corridor between Rogerstone and Bettws. 250.C1: We advise that development should not occur along the watercourse. 1623.C1: Suitable areas of habitat should be left undeveloped in order to maintain habitat connectivity. Our preference would be for wildlife corridors to be left undisturbed. However, if this is not possible, then we request that should your Authority be minded to take forward these sites, then the allocation include an annotation that requires the design of the development to incorporate buffer zones and a suitable corridor for wildlife, in order to maintain habitat connectivity. We also note that a number of sites lie within a SSSI, including the following sites: 302.C1, 2050.C1, 140.C1, 232.C1, 1525.C5, 1654.C1, 232.C3, 1420.C1, 1654.C1, 250.C1 Should your Authority be minded to take forward these sites in the Plan, then suitable studies should be carried out to enable you to ascertain whether appropriate mitigation for loss of habitat would be possible.	This comment will be taken forward as part of nature conservation policy by the LDP team.	in the SAR.
	Water Resources cSites 2046.C1 and 1602.C1 lie within the area of Basseleg Weir. The River Ebbw has flow issues from Basseleg Weir to the Usk Estuary. Any abstraction from the River Ebbw in this stretch would be likely to have flow conditions imposed on it. You should contact DCWW to ensure that sufficient water exists to supply the proposed development, prior to allocating the site in your Plan, in order for the allocation to be justifiable and deliverable. We note that the following cSites lie within the Caldicot Levels IDB: 1673.C1, 1674.C1, 169.C1, 232.C3, 1633.C1, 302.C1, 1667.C1, 2050.C1, 1420.C1, 1525.C1, 140.C1, 232.C1, 2053.C1, 1466.C1, 1654.C1 This is controlled by the Caldicot and Wentlooge Internal Drainage Board. The amount of water in the levels is carefully managed by the Caldicot and Wentlooge Internal Drainage Board. You should contact DCWW to ensure that sufficient water exists to supply the proposed development, prior to allocating the sites in your Plan, in order for the allocations to be justifiable and deliverable.	Noted. This is a consideration for the LDP team in the first instance. Findings of additional work should be integrated into the SA following this work. Dwr Cymru /Welsh Water have been consulted.	Dwr Cymru /Welsh Water have been consulted by the LDP team.
	We note that Table 9.1 contains details of your Candidate Sites (cSites), and note that you have not yet made a decision on whether to take these sites forward into your Plan. Our advice is that all sites that you are considering taking forward as allocations should be assessed via a Strategic Flood Consequences Assessment (SFCA).	Noted. SFCA is being undertaken and will inform the LDP.	Findings of additional work will be integrated into the SA when

Respondent	Comments	Response	Action
			available.
	We note that Table 9.1 contains details of your Candidate Sites (cSites), and note that you have not yet made a decision on whether to take these sites forward into your Plan. Our advice is that all sites that you are considering taking forward as allocations should be assessed via a Strategic Flood Consequences Assessment (SFCA). A SFCA can form a key part of your Local Development Plan (LDP) and Sustainability Appraisal (SA) robust evidence base, inform decisions on the consideration of alternatives and selection of options, test suitability of land for development and deliverability, and also help you determine appropriate development policies and annotations for inclusion in the Plan. Our advice is that the SFCA should inform your decision on which of the Candidate Sites (cSites) are suitable for inclusion in the Deposit Plan. As part of considering sustainability options, a SFCA can support your Authority's explanations of how a precautionary framework has been applied and the positive steps which have been taken to promote development in zones A and B of the Welsh Assembly's Government Development Advice Maps (dams), where river or coastal flooding will be less of an issue, thereby guiding development away from areas at high risk of flooding towards areas where flooding is less of an issue. This is also an important part of the Preferred Strategy. Technical Advice Note 15 Development and Flood Risk (July 2004) (TAN15) advises that highly vulnerable development and Emergency Services in zone C2 should not be permitted and further advises that a LPA will need to fully explain and justify the reasons for allocating a site within zone C, as defined by the Welsh Assembly Government's dams referenced in TAN15. As part of this justification TAN15 advises the LPA to undertake a broad level assessment. This assessment should demonstrate that the consequences of flooding have been understood and are capable of being managed in an acceptable way. Where such local information has been produced then this should be reflected in the Plan. The SFCA adopts a staged approach and is intended to encompass broad level assessments. At each stage an LPA should identify whether it needs a more detailed assessment. Managing flood risk can have a significant impact on the design, cost and viability of developments. LPAs should satisfy themselves that the flood risk management measures associated with a potential allocation (strategic, non-strategic and alternative) identified are feasible, practicable and deliverable. An assessment should be undertaken and agreed prior to land being allocated for development to ensure that such land is suitable for inclusion in the Plan. The outcomes of the SFCA will identify matters to be investigated at a detailed site specific Flood Consequence Assessment (FCA) stage; resulting in annotations in the deposit plan. The advice given in TAN15 (paragraphs 10.6 and 10.7) is that if the consequences are considered acceptable, such information should be reflected in the Plan. The resulting allocation should include annotation of flooding as a constraint for the individual site on the proposals map and specify the policy requirements which pertain to the development of that site.	Noted. SFCA is being undertaken and will inform the LDP.	Findings of additional work will be integrated into the SA when available.

Respondent	Comments	Response	Action
	This will include making it clear that in taking forward an allocation a developer will need to undertake detailed technical assessment in accordance with appendix 1, to ensure that the nature of the proposed development is acceptable, that it is suitably designed to cope with the risk of flooding, and that any funding and maintenance provision is appropriate. The findings of the SFCA and need for site-specific FCA work to be undertaken by developers should be annotated in the Plan. We note that some candidate sites benefit from previous planning permissions and that some of these permissions we supported by FCAs that were acceptable at the time that planning permission was granted. While you may be able to use these previous FCAs to inform of your SFCA, you should ensure that the information you use is up to date, and that you follow current guidance. We would expect a SFCA to be part of the deposit plan consultation, forming part of the evidence base and/or supporting information, informing policies and proposals. The SFCA therefore must be completed in advance of the deposit plan. We wish to continue our liaison in regard to the SFCA and request sufficient time is allowed for review. Notwithstanding the outcomes of your SFCA, we have reviewed the Candidate Sites contained in your Initial Sustainability Appraisal Report (ISAR). Having reviewed these Candidate Sites in terms of flood risk, we provide our current advice, under four headings, which is as follows: a. cSites at risk of flooding, where we have considerable concerns regarding the degree to which the risks and consequences of flooding can be managed, and where it is our initial view that mitigation is unlikely to be possible, unless your SFCA and the inclusion of detailed assessment demonstrates otherwise (3 sites). b. cSites at risk of flooding, but where there appears to be scope for options which may prove feasible and practicable to overcome the risks and consequences. These are sites that require further assessments to demonstrate whether options can manage risk and consequence, and which require the identification of suitable options for mitigation in your SFCA (34 sites). c. cSites where part of the site is at risk of flooding, and where we advise that only part of the site should be allocated, or only part of the site can be developed (10 sites). d. cSites that do not appear to be at risk from fluvial (River) or tidal flooding, however, where other types of flooding should be assessed. For these sites, we may have advice on surface water management, culverting and realignment of watercourses. Your SFCA may also assess other matters (53 sites). We advise on each of these headings in turn. Please note that we provide some general advice relevant to all sites, where appropriate, at the end of this representation.		
	Mitigation is unlikely to be possible, unless your SFCA and the inclusion of detailed assessment demonstrates otherwise. 1425.C1 Redwick 1633.C1 Redwick*	Noted. SFCA is being undertaken and will inform the LDP.	Findings of additional work will be integrated into the SA when

Respondent	Comments	Response	Action
	2075.C2 Peterstone As your Authority is aware, the cSites lie within zone C1. Our Flood Zone maps confirm the sites to be at risk of flooding. The main flood risk is from tidal inundation as a result of a breach of sea defences. It appears that no FCA has been undertaken previously for these sites. There is therefore no evidence in place to demonstrate that the risks and consequences of flooding are manageable. It has not been demonstrated that the risks and consequences of tidal inundation could be acceptably managed, and your assessment may show that suitable mitigation measures are unlikely to be possible. It is unclear how escape/ evacuation routes could be show to be "operational under all conditions" in line with guidance contained in A1.12 of TAN15, or how an acceptable flood evacuation plan could be implemented. However, our advice remains that if this site is taken forward, then it should be considered as part of your SFCA (which should include a breach analysis). This will allow you to better understand the risks and consequences to and from the site, informing your decision to include or exclude this cSite in the Plan. In addition, surface water management should be considered. A Greenfield runoff restriction of 3.5l/s/ha applies at this site. We recommend that you consult the IDB to gain their views on the proposed allocation, as they may have other requirements. * Note regarding 1633.C1 Redwick: We note that the proposed use is agricultural, although it is unclear whether this use only includes grazing, or whether ancillary buildings are proposed. Section 11.21 of TAN 15 states that agricultural developments are likely to be acceptable in all areas where there is risk of flooding. However, ancillary buildings or structures required for these uses may not be acceptable in accordance with section 7 of the TAN. Therefore, if ancillary buildings or structures are proposed, then our advice is as above. However, if no buildings or structures are required, then the site should still be included in your SFCA, although it is more likely the site would be suitable for allocation.		available.
	b. cSites at risk of flooding, but where there appears to be scope for options which may prove feasible and practicable to overcome the risks and consequences. These are sites that require further assessments to demonstrate whether options can manage risk and consequence, and which require the identification of suitable options for mitigation in your SFCA. The SFCA should consider each of these sites at stages 1, 2 and 3 and should propose suitable mitigation options in order for your Authority to be satisfied that such measures proposed are feasible, practical and deliverable, prior to the land being allocated for development. The risks and consequences of flooding should be shown to be capable of being acceptably managed prior to the land being allocated in the Plan.	Noted. SFCA is being undertaken and will inform the LDP.	Findings of additional work will be integrated into the SA when available.

Respondent	Comments	Response	Action
	We provide detailed advice on the risk, and other matters on each site in turn, where appropriate, and where it may help you in the preparation of your SFCA:		
	1562.C1 Novelis As your Authority is aware, the cSite lies within zone C1. Our flood zone maps confirm the site to be at risk from flooding. The main risk is from fluvial flooding from the River Ebbw following a breach of a flood defence that affords protection to the site. It is our understanding that the defence is privately owned, and the standard or condition of the defence should be assessed as part of your SFCA. At present, it is unclear what mitigation options could be implemented, and whether the risks and consequences resulting from breach of the defence could be acceptably managed. However, this is something that the SFCA should address to ascertain if mitigation options are possible, in order to ensure that the allocation is feasible and deliverable	Noted. SFCA is being undertaken and will inform the LDP.	Findings of additional work will be integrated into the SA when available.
	1673.C1 Uskmouth/ Sloblands 1674.C1 Uskmouth/ Sloblands We refer you to advice given on these two cSites in our representation on major sites	Noted. See above.	No further action.
	2095.C1 Traston As your Authority is aware, the cSite lies within zone C1. Our flood zone maps also confirm the site to be at risk of flooding. We note that the proposed use is given as “outdoor sport and play space”. If this does not include any change of levels or erection of structures, then we would not offer any adverse advice to the inclusion of this site in the Plan. However, if ground level raising, buildings or structures are proposed, then our advice is that it should be assessed as part of your SFCA.	Noted. SFCA is being undertaken and will inform the LDP.	Findings of additional work will be integrated into the SA when available.
	1445.C1, 1602.C1 and 28.C1 Tredegar As your Authority is aware, the proposed candidate sites lie within zone C2 as defined by the development advice maps (dam) referred to under TAN15. Our Flood Zone maps also confirm that the area is at risk of flooding. The River Ebbw runs through the sites and is designated under the Water Resources Act 1991 as a statutory main river watercourse. On 22 March 2007 the Welsh Assembly Government Planning Decision Committee allowed joint appeals (APPEAL A G6935/A/05/1186037 (PG/SAD/03/1763) and APPEAL B G6935 /A /05/1193193 (PG/05/1203)) regarding Tredegar Park Golf Course, Sports Field and Recreation Ground. Both appeals were determined on basis of flooding issues and the Planning Committee concludes that in this particular case the reduction in flood risk offered by the proposals is such that it outweighs the possible future benefits arising from refusing new development on the land. We refer your Authority to these previous appeals in relation to this site, where previous information on risk and consequences of flooding may inform your SFCA. The scheme is still progressing and mitigation works are yet to be agreed. To demonstrate commitments in your Plan, the requirements of TAN15 should be considered by your local planning	Noted. SFCA is being undertaken and will inform the LDP.	Findings of additional work will be integrated into the SA when available.

Respondent	Comments	Response	Action
	authority and assessed as part of your SFCA. Up to date information and guidance may need to be considered.		
	169.C1 and 232.C3 Solutia As your Authority is aware, the cSite lies within zone C1. Our flood zone maps also confirm the site to be at risk of flooding. These cSites should be assessed as part of your SFCA	Noted. SFCA is being undertaken and will inform the LDP.	Findings of additional work will be integrated into the SA when available.
	232.C2 Whiteheads We refer you to advice given on this cSite in our representation on major sites.	Noted. See above.	No further action.
	302.C1, 1667.C1 and 2061.C1 Marshfield West 1525.C3, 2050.C1 and 2050.C2 Marshfield East These cSites lie within zone C1 our flood zone maps confirm the sites to be at risk of flooding. Flood risk is from tidal inundation following a breach of the sea defences. You may wish to review and consider the SFCA produced by Cardiff City Council as part of their LDP and SFCA process. Their SFCA shows the extent of flooding in the Marshfield area both today and in 2050. We recommend that you consider the information produced in that SFCA in the production of your own assessment.	Noted. SFCA is being undertaken and will inform the LDP.	Findings of additional work will be integrated into the SA when available.
	1521.C1 and 2060.C1 Herbert Road These two cSites lie within zone C1 and our flood zone maps confirm the sites to be at risk of flooding. The main risk is from tidal flooding from the River Usk. Whilst there is an existing flood defence wall at Riverside, we are aware of 'gaps' within the scheme that leads to the area being at risk of tidal flooding. We are currently designing a flood defence scheme for the area, which we expect to be implemented within the timeframe of this LDP. This flood defence scheme would alleviate the flood risk to the area up to the 1 in 200 year flood level, with an allowance for climate change. Following completion of these works, residential development (though not necessarily emergency services) in this area is likely to be able to comply with the requirements of TAN 15. Such factors should be included in your SFCA.	Noted. SFCA is being undertaken and will inform the LDP.	Findings of additional work will be integrated into the SA when available.
	1420.C1, 1669.C1 and 3.29.C1 Llanwern We refer you to advice given on these cSites in our representation on major sites.	Noted. See above.	No further action.
	140.C1 Duffryn The site lies within zone C1 and our flood zones 2 and 3. The main risk is from tidal inundation as a result of a breach of the sea defences. We note that a FCA was produced in 2008 for hotel development at this site, and that the FCA demonstrated that the risks and consequences of flooding could be acceptably managed. However, we note that a difference use is proposed for the candidate site (mixed use). Your SFCA should include an up to date assessment and should assess whether the risks and	Noted. SFCA is being undertaken and will inform the LDP.	Findings of additional work will be integrated into the SA when available.

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	consequences of a tidal flooding resulting from a breach of the defences could be could be acceptably managed.		
	1525.C5, 1664.C1, 2053.C1 Duffryn These cSites lie within zone C1 and our flood zone maps confirm the sites to be at risk from flooding. The main flood risk is from tidal inundation as a result of a breach of the sea defences. Your SFCA should include an up to date assessment and should assess whether the risks and consequences of a tidal flooding resulting from a breach of the defences could be managed. We agree with the conclusions in the ISAR which state that there should be no net increase in surface water runoff as a result of development to reduce the increased risk of flooding through the development of Greenfield sites. This is a consideration for the SFCA	Noted. SFCA is being undertaken and will inform the LDP.	Findings of additional work will be integrated into the SA when available.
	232.C1 Duffryn This cSite lies within zone C1 and our flood zone maps confirm the site to be at risk from flooding. The main flood risk is from tidal inundation as a result of a breach of the sea defences. The sites should be assessed as part of your SFCA. The easternmost and westernmost sites included under this allocation do not benefit from planning permission. However, according to our records, the central site has planning permission for (07/0756) an industrial use, and a FCA that demonstrated that the risks and consequences of flooding could be acceptably managed was submitted in support of the application. This may inform your SFCA. You may be able to use some of the information contained in that FCA to inform your assessment, however, we consider that an up to date assessment should be produced to assess whether the risks and consequences of a tidal flooding resulting from a breach of the defences could be managed.	Noted. SFCA is being undertaken and will inform the LDP.	Findings of additional work will be integrated into the SA when available.
	1623.C1 Celtic Manor The cSite lies partially within zone C1 and our flood zone maps confirm the site to be at risk from flooding. The main risk is from fluvial flooding from the rivers Usk, Llwyd and Sor. We note that considerable land raising has been undertaken as part of the development. The site should be assessed under your SFCA; we understand that this site benefits from planning permission (01/0356). We were consulted on a number of applications for the discharge of conditions of that planning permission. We recently met with your Authority's Development Control Team, as we had queries regarding the level of land raising proposed, as part of the scheme and await clarification on this point. We discussed with your Authority and consultants that the land raising will not have a detrimental effect on the flooding regime, and are also waiting for confirmation that this is the case. The cSite should still be assessed as part of the SFCA. You should assess the cSite in your SFCA in order to understand the risks and consequences to the site from other forms of flooding, including surface water flooding and groundwater flooding, although you may be able to use some of the FCA and modelling work already undertaken in order to inform	Noted. SFCA is being undertaken and will inform the LDP.	Findings of additional work will be integrated into the SA when available.

Respondent	Comments	Response	Action
	you SFCA.		
	1670.C1 Carcraft 76.C1 Coleg Gwent These cSites lie within zone C1 and our Flood Zone maps confirm the sites to be at risk from flooding. The main flood risk is from tidal inundation as a result of a breach of the flood defences. Your SFCA should assess whether the risks and consequences of a tidal flooding resulting from a breach of the defences could be managed.	Noted. SFCA is being undertaken and will inform the LDP.	Findings of additional work will be integrated into the SA when available.
	1466.C1 Glan Llyn We refer you to advice given on this cSite in our representation on major sites	Noted. See above.	No further action.
	1654.C1 Airport We refer you to advice given on this cSite in our representation on major sites.	Noted. See above.	No further action.
	1511.C1 Crindau 224.C1 Crindau 224.C2 Crindau The sites lies within zone C1 and our flood zone maps confirm the site to be at risk of flooding. The main risk of flooding is from the overtopping of the tidal flood defences. We note that planning applications have previously been submitted for these sites and that these have been accompanied by acceptable FCAs. The cSites should be included in the SFCA to ensure that the most current information and up to date guidance, including climate change is used in the assessment.	Noted. SFCA is being undertaken and will inform the LDP.	Findings of additional work will be integrated into the SA when available.
	c. cSites where part of the site is at risk of flooding, and where we advise that only part of the site should be allocated, or only part of the site can be developed.	Agreed.	Flood risk is considered in the latest version of the SA.
	The following sites are in areas which are partially within zones C1 or C2. Development should be directed away from areas of high risk of flooding in the first instance on the site. If sites in zone C1 or C2 are included, then the Plan policy and/or text should recognise flooding as a constraint to the development, as this may influence density and layout. The LPA may wish to consider whether an allocation should include an annotation that the areas of risk should only be used for open space, with no buildings, structures or land raising to occur within the flood plain. Please note that all these sites should still be included in your SFCA in order to enable to you fully understand the risks from all forms of flooding to the site, and to ascertain whether suitable mitigation or avoidance of areas is feasible and practicable.	Agreed.	Flood risk and the SFCA is considered in the latest version of the SA.
	300.C1 Penrhos Farm A small part of this site lies within zone C2, and our flood maps confirm the site to be partially at risk from flooding. The main risk is from fluvial flooding from the Sor Brook	Agreed.	Flood risk and the SFCA is considered in the

Respondent	Comments	Response	Action
			latest version of the SA.
	250.C1 Langstone South / Eastern Expansion Area The northern parts of the site (i.e. the portions of the site north of the A48) lie predominantly within zone C2. Our flood maps confirm the site to be partially at risk from flooding. A small part of the southern part of the site lies within zone C2 and our flood zones 2 and 3. We agree with the comments contained in the ISAR that the part of the site that is C2 should not be developed and that green infrastructure should be provided to include SuDS. We note that the sites benefits from planning permission 06/0845 and that an FCA was submitted with the application which demonstrated that the risks and consequences of flooding could be managed at that time. This FCA may be used to inform your SFCA, but up to date information and guidance should be used.	Noted. SFCA is being undertaken and will inform the LDP.	Flood risk and the SFCA is considered in the latest version of the SA.
	1400.C1, 1688.C1, 1400.C2 Langstone South A small part of the part lies within zone C2 and our flood maps confirm the site to be partially at risk from flooding. We agree with the comments in the ISAR which states that “it is recommended that this part of the site is not developed and that green infrastructure is provided within the site to include SuDS”.	Noted with thanks.	No further action necessary.
	1117.C1, 1117.C2, Bettws The sites lie partially within zone C2 and our flood maps confirm the site to be partially at risk from flooding, with the flood plain of the Bettws Brook running through the centre of the sites. We agree with the comments in the ISAR that it should be ensured that no residential development is built within the floodplain or increases surface water runoff.	Noted with thanks.	No further action necessary.
	303.C1 Broadway The sites lie partially within zone C2 and our flood maps confirm the site to be partially at risk from flooding. The site lies adjacent to the River Usk, which is a designated Main River. We agree with the comments in the ISAR which stated that any development that could potentially affect the river should not be permitted.	Noted with thanks.	No further action necessary.
	1665.C1 Caerleon North The southern part of the site lies partially within zone C2 and our flood maps confirm the site to be at risk from flooding. Ordinary watercourses are present on the site. We agree with the comments in the ISAR that state that surface water management including SuDS should be promoted in the development at this site. Surface water should be assessed as part of the SFCA.	Noted.	Flood risk and the SFCA is considered in the latest version of the SA.
	2046.C1 Retail East Part of the site is located within zone B and a small corner of the site is located within zone C1 and our flood zones 2 and 3. Ordinary watercourses are present on the site. Development should not be	Noted with thanks.	No further action necessary.

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	permitted in the floodplain.		
	d. cSites that do not appear to be at risk from fluvial (River) or tidal flooding, however, where other types of flooding should be assessed. For these sites, we may have advice on surface water management, culverting and realignment of watercourses. Your SFCA may also assess other matters. Please refer to our general advice (below) on these following sites. • 155.C2 St Cadocs, • 1510.C1 Rogerstone, 12.32.C2 Rogerstone • 232.C4 Pirelli • 2041.C1, 2042.C2 Ringland • 2051.C1 Langstone South • 1415.C1 and 2057.C1 Castleton • 198.C1 Whiteheads • 155.C2, 155.C3 Royal Gwent • B1232.C1 Queenshill • 51.C3, 51.C4 Parc Seymour • 2077.C1 Langstone South • 2062.C1 Castleton • 1501.C1 Caerleon North • 2073.C1, 2073.C2 Rogerstone • 65.C2, 1666.C2 Petrepoeth • 142.C1 Pilton Vale • 1341.C1, 51.C1, 51.C2, 1468.C1 Park Seymour • 2075.C1 Michaelstone • B1525.C1, 1525.C7, 2076.C1 Malpas • 333.C1 Coldra • 1309.C1 Castleton • 2072.C2 Gloch Wen • 144.C1, 1525.C6, 1666.C1 Petrepoeth • 2049.C1 Parc Seymour • 2059.C1 and 2074.C1 Penhow • 1343.C1 and 132.C1 Langstone North • 299.C1 Allt yr Yn • 28.C5 and 28.C5 Bassaleg • 2065.C1, 2070.C1 Castleton	Noted.	Flood risk and the SFCA is considered in the latest version of the SA.

Respondent	Comments	Response	Action
	• 65.C1 Eastern Expansion Area • 2072.C1 Gloch Wen • C3, C4, C2 DIY • 1525.C4 adj Hartridge		
Gwent Wildlife Trust	We are supportive of the site specific recommendations of the Sustainability Appraisal. We also strongly support the recommendation to develop a green infrastructure strategy that could be used as SPG.	Noted with thanks.	No further action necessary.
Oak Court Estates (Langstone Mon) Ltd (Harmers Limited)	There appears to be confusion about the status of candidate sites, the role of the Sustainability Appraisal and how it is intended to inform the LDP process. Paragraph 9.26 states that some candidate sites "will have negative effects that can be avoided if they were to be de-allocated and development reallocated in more sustainable locations". Many of the candidate sites are not allocations. The paragraph continues by recommending that 5 sites are not carried forward for inclusion in the Preferred Strategy and a number of recommendations and notes are made with regard to the remaining sites. However, this process would appear to be academic for those candidate sites which do not have a planning permission as the Preferred Strategy is dependent on existing commitments and allocations. The Sustainability Appraisal process should have considered alternative Strategic Options for growth in order to inform the Preferred Strategy rather than carry out a largely academic exercise of appraising strategic sites which will not conform to the Preferred Strategy.	Noted.	How the candidate sites relate to the site allocations is included in the SAR.
	It is noted that as a result of the Sustainability Appraisal carried out for Langstone North there is no overriding objection to the proposals. The notes/recommendations which accompany the Sustainability Assessment recommends that a mixed use scheme on one portion of the site should include a new village centre to include convenience shopping, health centre, post office and education facilities and that the benefits of the scheme are realised for the entire community through sustainable accessibility provision. It continues with the recommendation that the site should be developed to link and promote accessibility by walking and cycling including connection to wider routes, connecting the area to the city. These recommendations accord with the mixed use proposals that were submitted for the site at the strategic candidate site stage. The Council will also be aware that the site was promoted though the UDP and the planning inspector recognised that the site "is not without its merits, a safe access to it could be provided, it could be serviced, it would not cause substantial harm in terms of its ecological, conservation or landscape effects and it is outside the floodplain." The Sustainability Appraisal should have been used to consider alternative strategic options for growth prior to the determination of the Preferred Strategy. On the basis that the Preferred Strategy is flawed as it will not deliver the housing requirement it should be recognised that there is a requirement to release greenfield sites. A mixed use scheme in Langstone North as confirmed by the	The purpose of the SA is to inform the plan making process, but will not provide the whole picture. All relevant factors need to be taken into account.	No further action required.

Respondent	Comments	Response	Action
	Sustainability Appraisal would provide a sustainable settlement extension in Langstone which would contribute to the provision of an adequate range and choice of sites which will be a requirement of the Deposit LDP		
	Non Technical Summary Representation Under Stage B Assessment it states that a series of spatial strategic options has been assessed. This is not the case. The Strategic Options are not spatial options but are options relating to eight separate topic areas. In selecting the Preferred Strategy the Council therefore has not assessed alternative strategic spatial options for growth but have relied on the premise that the existing commitment/allocations in the UDP are sufficient to meet the LDP's housing requirement. Therefore no consideration has been given to alternative spatial strategic options. The Sustainability Appraisal should have assessed alternative spatial strategic options rather than the separate topic areas and as such the LDP fails the test of soundness CE2 which states that "the strategy, policies and allocations are realistic and appropriate having considered relevant alternatives and are founded on a robust and credible evidence base."	Disagree. The Strategic Options specifically included a market led option on housing delivery, which would allow peripheral extensions, such as that proposed at Oak Court.	No further action required.
	Paragraph 8.10 states that many of the potential effects of the options are unknown and that in order for a preferred option to be determined further information is sought as to the potential of the area for economic growth, so that housing provision is matched by employment opportunities in the local area. However, despite this paragraph 8.11 recommends that options HN2 is carried forward as the preferred option but it is stressed that this is a marginal recommendation and further clarification is needed. There is concern that the Council have adopted option HN2 without this clarification. The Sustainability Assessment should be carried out with the necessary information being available relating to the potential of the area for economic growth and to enable housing provision to be matched by employment opportunities in the area.	The Preferred Strategy does seek to match housing and employment growth, both of which show clear trends over time, and both of which have been affected by the global economic recession.	Further evidence on latest trends and projections to inform Deposit Plan and SA.
	It is difficult to understand the purpose of the Sustainability Assessment of the Strategic Sites. The Strategic Sites includes a mixture of sites, some of which already have planning permission and others which do not have planning permission and have been submitted as candidate sites. Many of the sites have been amalgamated with nearby sites and have, therefore, not been assessed individually which brings into question the validity of each Sustainability Appraisal. As the Preferred Strategy specifies that the housing requirements can be met from existing commitments and allocations there is no clear explanation of the purpose of the Strategic Sites Appraisal. There has been no consideration of alternative strategic options for growth prior to the choice of the Preferred	Disagree. The Strategic Options did include alternative growth assumptions and also the option of a market led approach to	No further action required.

Respondent	Comments	Response	Action
	Strategy. Therefore, even if a strategic site which does not have planning permission scores highly in the sustainable assessment it is unlikely to be included in the LDP as the Preferred Strategy is likely to preclude any new allocations. Prior to the choice of the Preferred Strategy the Sustainability Appraisal should have assessed spatial options for growth. The Sustainability Appraisal must provide an explanation of the purpose for the Sustainability Assessment of the strategic sites which, for those sites which do not have planning permission and have been put forward for consideration as allocations, appears to be an academic exercise only. If genuine consideration is to be given to submitted candidate sites for inclusion in the LDP then they must be assessed on an individual basis.	housing delivery, under which the Oak Court proposal could have been included. The grouping of sites is considered to assist by avoiding extensive repetition of much of the same information for sites in the same locality. This does not preclude eventual different decisions on individual sites. The purpose of the SA is to inform the plan making process, but will not provide the whole picture. All relevant factors need to be taken into account.	
Redrow Homes (SW) Ltd (Harmers Ltd)	Paragraph 8.10 states that many of the potential effects of the options are unknown and that in order for a preferred option to be determined further information is sought as to the potential of the area for economic growth, so that housing provision is matched by employment opportunities in the local area. However, despite this paragraph 8.11 recommends that option HN2 is carried forward as the preferred option but it is stressed that this is a marginal recommendation and further clarification is needed. There is concern that the Council have adopted option HN2 without this clarification. The Sustainability Assessment should be carried out with the necessary information being available relating to the potential of the area for economic growth and to enable housing provision to be matched by employment opportunities in the area.	Strategy does seek to match housing and employment growth, both of which show clear trends over time, and both of which have been affected by the global	Latest trends and projections to inform Deposit Plan.

Respondent	Comments	Response	Action
		economic recession.	
	It is difficult to understand the purpose of the Sustainability Assessment of the Strategic Sites. The Strategic Sites include a mixture of sites, some of which already have planning permission and other which do not have planning permission and have been submitted as candidate sites. Many of the sites have been amalgamated with nearby sites and have therefore not been assessed individually which brings into question the validity of each Sustainability Appraisal. As the Preferred Strategy specified that the housing requirements can be met from existing commitments and allocations there is no clear explanation of the purpose of the Strategic Sites Appraisal. There has been no consideration of alternative strategic options for growth prior to the choice of the Preferred Strategy. Therefore even if a strategic site which does not have a planning permission scores highly in the Sustainable Assessment it is unlikely to be included in the LDP as the Preferred Strategy is likely to preclude any new allocations. Prior to the choice of the Preferred Strategy the Sustainability Appraisal should have assessed spatial options for growth. The Sustainability Appraisal must provide an explanation of the purpose of the Sustainability Assessment of the strategic sites which, for those sites which do not have planning permission and have been put forward for consideration as allocations, appears to be an academic exercise only. If genuine consideration is to be given to submitted candidate sites for inclusion in the LDP then they must be assessed on an individual basis.	Disagree. The Strategic Options did include alternative growth assumptions and also the option of a market led approach to housing delivery. The grouping of sites is considered to assist by avoiding extensive repetition of much of the same information for sites in the same locality. This does not preclude eventual different decisions on individual sites. The purpose of the SA is to inform the plan making process, but will not provide the whole picture. All relevant factors need to be taken into account.	No further action required.
	There appears to be confusion about the status of candidate sites, the role of the Sustainability Appraisal and how it is intended to inform the LDP process. Paragraph 9.26 states that some	Disagree. The SA has considered all	No further action required

Respondent	Comments	Response	Action
	candidate sites "will have negative effects that can be avoided if they were to be de-allocated and development reallocated in more sustainable locations". Many of the candidate sites are not allocations. The paragraph continues by recommending that 5 sites are not carried forward for inclusion in the Preferred Strategy and a number of recommendations and notes are made with regard to the remaining sites. However, this process would appear to be academic for those candidate sites which do not have a planning permission as the Preferred Strategy is dependent on existing commitments and allocations. The Sustainability Appraisal process should have considered alternative strategic options for growth in order to inform the Preferred Strategy rather than carry out a largely academic exercise of appraising strategic sites which will not conform to the Preferred Strategy.	the proposed sites, including sites with current permissions, to ensure that the most sustainable approach for site delivery.	
	There is concern that the Sustainability Appraisal of site 12 (Pentrepoeth) relates to the amalgamation of 5 sites and has not been carried out specifically for the candidate site submitted on behalf of Redrow. Whilst the amalgamated strategic site for Pentrepoeth scores highly in sustainability terms if a sustainability appraisal were to be carried out of the submitted candidate site it would score even higher. The site was promoted through the UDP where the Inspector stated that "given its proximity to local services and bus routes the site is in a sustainable location" and that "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. A sustainability appraisal should be undertaken for the candidate site submitted on behalf of Redrow which would confirm that the allocation of the site in the LDP would represent a sustainable settlement extension.	The grouping of sites is considered to assist by avoiding extensive repetition of much of the same information for sites in the same locality. This does not preclude eventual different decisions on individual sites. The purpose of the SA is to inform the plan making process, but will not provide the whole picture. All relevant factors need to be taken into account.	No further action required
Hicks, Mr & Mrs T F & Mr B (Harmers Ltd)	Paragraph 8.10 states that many of the potential effects of the options are unknown and that in order for a preferred option to be determined further information is sought as to the potential of the area for economic growth, so that housing provision is matched by employment opportunities in the local area. However, despite this paragraph 8.11 recommends that option HN2 is carried forward as the preferred option but it is stressed that this is a marginal	Strategy does seek to match housing and employment growth, both of which show clear	No further action required

Respondent	Comments	Response	Action
	recommendation and further clarification is needed. There is concern that the Council have adopted option HN2 without this clarification. The Sustainability Assessment should be carried out with the necessary information being available relating to the potential of the area for economic growth and to enable housing provision to be matched by employment opportunities in the area.	trends over time, and both of which have been affected by the global economic recession.	
	There appears to be confusion about the status of candidate sites, the role of the Sustainability Appraisal and how it is intended to inform the LDP process. Paragraph 9.26 states that some candidate sites "will have negative effects that can be avoided if they were to be de-allocated and development reallocated in more sustainable locations". Many of the candidate sites are not allocations. The paragraph continues by recommending that 5 sites are not carried forward for inclusion in the Preferred Strategy and a number of recommendations and notes are made with regard to the remaining sites. However, this process would appear to be academic for those candidate sites which do not have a planning permission as the Preferred Strategy is dependent on existing commitments and allocations. The Sustainability Appraisal process should have considered alternative Strategic Options for growth in order to inform the Preferred Strategy rather than carry out a largely academic exercise of appraising strategic sites which will not conform to the Preferred Strategy.	Disagree. The SA has considered all the proposed sites, including sites with current permissions, to ensure that the most sustainable approach for site delivery.	No further action required.
	It is difficult to understand the purpose of the Sustainability Assessment of the Strategic Sites. The Strategic Sites include a mixture of sites, some of which already have planning permission and others which do not have planning permission and have been submitted as candidate sites. Many of the sites have been amalgamated with nearby sites and have, therefore, not been assessed individually which brings into question the validity of each Sustainability Appraisal. However, as the Preferred Strategy specifies that the housing requirements can be met from existing commitments and allocations there is no clear explanation of the purpose of the Strategic Sites Appraisal. There has been no consideration of alternative strategic options for growth prior to the choice of the Preferred Strategy. Therefore even if a strategic site which does not have a planning permission scores highly in the sustainable assessment it is unlikely to be included in the LDP as the Preferred Strategy is likely to preclude any new allocations. Prior to the choice of the Preferred Strategy the Sustainability Appraisal should have assessed spatial options for growth. The Sustainability Appraisal must provide an explanation of the purpose of the Sustainability Assessment of the strategic sites which, for those sites which do not have planning permission and have been put forward for consideration as allocations, appears to be an academic exercise only. If genuine consideration is to be given to submitted candidate sites for inclusion in the LDP then they must be assessed on an individual basis.	The grouping of sites is considered to assist by avoiding extensive repetition of much of the same information for sites in the same locality. This does not preclude eventual different decisions on individual sites. The purpose of the SA is to inform the plan making process, but will not provide the whole	No further action required.

Respondent	Comments	Response	Action
		picture. All relevant factors need to be taken into account.	
	There is concern about the value of the Sustainability Appraisal of site 28 Duffryn which is based on an amalgamation of 5 submitted candidate sites which are proposed for different uses and are in different locations. To be of any value each of the sites should have been assessed individually. The notes/recommendations derived from the Sustainability Appraisal are therefore considered meaningless. The strategic candidate site submission (140.C1) was submitted as a strategic site for a western expansion to Newport. As the Sustainability Appraisal has not assessed strategic spatial options prior to the determination of the Preferred Strategy the site will not be given further consideration. As such the LDP will not meet the test of soundness CE2 which states "The strategy, policies and allocation are realistic and appropriate having considered the relevant alternatives and are founded on a robust and credible evidence base".	The grouping of sites is considered to assist by avoiding extensive repetition of much of the same information for sites in the same locality. This does not preclude eventual different decisions on individual sites. The purpose of the SA is to inform the plan making process, but will not provide the whole picture. All relevant factors need to be taken into account.	No further action required.
	Under Stage B Assessment it states that a series of spatial strategic options has been assessed. This is not the case. The Strategic Options are not spatial options but are options relating to eight separate topic areas. In selecting the Preferred Strategy the Council therefore has not assessed alternative strategic spatial options for growth but have relied on the premise that the existing commitment/allocations in the UDP are sufficient to meet the LDP's housing requirement. Therefore no consideration has been given to alternative spatial strategic options. The Sustainability Appraisal should have assessed alternative spatial strategic options rather than the separate topic areas and as such the LDP fails the test of soundness CE2 which states that "the strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust and credible evidence base".	Disagree. The Strategic Options did include alternative growth assumptions and also the option of a market led approach to housing delivery.	No further action required.
Gwent Healthcare	The Site Assessment undertaken in respect of the Strategic Sites is noted. The Royal Gwent and St Cadocs sites are included in this assessment but the St Woollos site is omitted. It is accepted that St	Noted.	No further action required.

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NHS Trust (Asbri Planning)	Woollos in its own right may not meet the criteria for a strategic allocation and that given the proximity to the Royal Gwent Hospital and its similar characteristics it merits a comparable assessment as the Royal Gwent.		
	Under SA Objective 2, it would appear that the Royal Gwent and St Cadocs sites are confused as St Cadocs has more protected trees yet it is assessed as being in conformity with the strategy whilst the Royal Gwent is not.	Noted.	This was considered by the LDP in the allocation of sites included in the Deposit Plan.
	The St Cadocs site is referred to as only partially meeting the criterion for being within walking or cycling distance of education facilities (SA Objective 16). This, however, is not accurate as, particularly with ongoing cycle path initiatives, the site will be within walking and cycling distance of primary, secondary and tertiary education facilities.	Noted. However, the site was assessed on its existing merits, and does not consider the possibility of future initiatives that may not be realised.	No further action necessary.
	Under SA Objective 19, the Royal Gwent Site is cited as only partially meeting the criteria for negatively affecting a Conservation Area and listed buildings. Given, however, the current scale and massing of the buildings on the site, and the new requirements under TAN 12: Design, any redevelopment scheme will be required to respect the existing designations and will result in an overall improvement in design quality. Both sites are also categorised as having a negative impact on an Area of Archaeological Importance. Development proposals on either site will however require comprehensive archaeological investigation. Indeed, current geo-physical surveys are underway on part of the St Cadocs site in order to determine to what extent archaeological constraints would affect proposals for a new health – related building.	Noted.	This was considered by the LDP in the allocation of sites included in the Deposit Plan.
	Under SA Objectives 21 and 23, i.e. related to provision of employment and tourism uses respectively. Whilst categorised as partially meeting the criterion, both sites have potential to accommodate both employment and tourism uses, and certainly at St Cadocs the proposed passenger rail facility will be an important component of future tourism initiatives in the area.	Noted. However, the site was assessed on its existing merits, and does not consider the possibility of future initiatives that may not be	No further action necessary.

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		realised.	
	Finally, the St Cadoc's site is not scored positively in the context of SA Objective 27 (mixed used development, including development within the City Centre). Options will however, remain for incorporation of employment uses in any future development, or indeed retention of some health services on the site which will provide employment opportunities.	Noted.	This was considered by the LDP in the allocation of sites included in the Deposit Plan.
	Whilst generally it is noted that the sites emerge well from the Assessment with more positive points than negative ones, for the above reasons the Initial Sustainability Report, particularly the results of the Strategic Site Assessment is objected to on the grounds that negative factors are applied unnecessarily.	Noted. The SA provides an objective assessment and professional judgement has been used to apply the scoring in accordance with the Framework agreed with consultees at the scoping stage.	No further action necessary.
RSPB	RSPB Reasons for Concern: The RSPB is concerned about this matter, and has a longstanding opposition to development on or affecting the Gwent Levels SSSI, and the Gwent Levels Coastal Grazing Marsh, a UK BAP Priority Habitat of acknowledged nature conservation concern. Background: The Gwent Levels SSSI is a statutorily designated composite SSSI, which is of national (UK) importance for nature conservation due to its reen flora and fauna. CCW, the National Assembly for Wales' statutory adviser on nature conservation matters, states that the Gwent Levels is one of the top four examples of this habitat in the UK. It is acknowledged by the local planning authority's Nature Conservation Strategy as being part of Newport's Critical Natural Capital, and thus irreplaceable. Newport local planning authority, as an authority pursuant to s28G of the NERC Act, has a duty to protect and enhance SSSIs. The Gwent Levels Coastal Grazing Marsh is a UK BAP Priority Habitat of acknowledged nature conservation concern. Newport has more of this scarce and declining resource than any other authority in Wales. Like the Gwent Levels SSSI, it is acknowledged by the local planning authority's Nature Conservation Strategy as being part of Newport's Critical Natural Capital, and thus irreplaceable. The Impacts of Built Development on SSSI Interest: The RSPB is firmly of the view that, in the case	Noted.	Additional data on issues added to SAR issues table and subsequent stages of the SA where necessary.

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	of housing, employment land and highway construction, the SSSI interest cannot coexist with built development. This is due to adverse impacts, which may include :- • Direct habitat destruction. • Overshadowing of the reens through built development, landscaping schemes or garden trees. • Eutrophication of reens due to leaf-fall from trees and shrubs in close proximity to reens, and to the uncontrolled (and incontrollable) deposition of garden waste, and diffuse pollution from fertilisers, applied either municipally or domestically. • Significant adverse impacts on water quality due to domestic or municipal application of pesticides and herbicides. • Lack of maintenance of reens due to insufficient buffering reens from built development to allow access for machinery. These significant adverse impacts have manifested themselves in past development on the SSSI, as evidences by a sample survey of post-construction monitoring carried out by the Gwent Wildlife Trust in support of evidence presented at the Newport UDP Public Inquiry. These showed a decline in SSSI interest after construction, notwithstanding any planning conditions or obligations or agreed. The conclusion that built development has had a significant adverse impact on SSSI interest is supported by CCW's "rapid review" of the condition of the SSSI, which showed a trend of "declining" quality. The primary factor accounting for this ("Factor1") was "development carried out under planning permission". The Role of Planning Conditions and Obligations: Due to the diffuse and uncontrollable nature of the adverse impacts referred to above, the RSPB is strongly of the view that they cannot be controlled through the use of planning conditions or obligations. Examples of this include the applications of domestic/municipal fertilisers, pesticides and herbicides, and the deposition of garden waste. Furthermore, even were attempts made to impose conditions or reach agreements over these matters, it would be impossible to enforce them because it would not be possible to monitor their manifestation or identify the culprit or culprits. A sample study of planning conditions imposed on developments on the SSSI, carried out by MSc students as a final year thesis at Cardiff School of City and Regional Planning showed that the majority of conditions imposed were not fit for purpose, and indeed could not be so. This brings us to the firm conclusion that built development of these types cannot coexist with SSSI interest, and therefore, given the abundance of land suitable for allocation outside the SSSI, no sites should be proposed for allocation in or affecting the SSSI. The Inspector of the Newport UDP Inquiry concurred with this, and recommended the deletion of all proposed allocations within the SSSI, apart from in exceptional circumstances of proven (UK) national		

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	economic need, and in the proven absence of alternative locations.		
	The role of the M4 Relief Road in the Preferred Strategy Employment Strategy: The development of an M4 Relief Road is a central plank of the Preferred Strategy. The pursuance of major employment Candidate Sites (including those proposed by the Welsh Assembly Government itself) are wholly dependent upon the development of this highway scheme, in that the latter would provide a defensible boundary to the city of Newport, and therefore land to the north of it would be identified as "infill". However, the M4 Relief Road does not appear in the draft Wales National Transport Plan (NTP), and the overwhelming likelihood is that the final version of the NTP will also omit it, as there have been no material changes of circumstance since the publication of the draft version in autumn 2009, and indeed the economic downturn renders arguments against the project even more compelling. The RSPB objects to this approach because a number of sites which would fall into the category of "infill" are located within the Gwent Levels SSSI. The RSPB is of the view that this is a fundamentally flaw in the LDP Preferred Strategy, which makes it unsound. This flaw goes to the heart of the plan, and it cannot be rectified retroactively at the Deposit stage. The RSPB therefore recommends that the Employment Strategy of the Preferred Strategy is the subject of a complete re-writing, which accepts the reality of the forthcoming deletion of the M4 Relief Road, and establishes a spatial strategy for employment land in Newport which avoids land allocations on the SSSI, and employs the existing settlement boundary. To fail to do this would be to fail to take account of a major material change of circumstances within the plan area, which will take place a matter of weeks after the production of the Preferred Strategy. The LDP would then be on a course which sets it against existing circumstances, and which runs the risk of allocating land for damaging development on a site statutorily designated for its national (UK) importance for nature conservation	The Welsh Government's direction to consult it on applications affecting the line of the new M4 remains in place. The employment sites adjoining it in the east also adjoin the Queensway route, now being upgraded to public highway, and can be served by it. The new M4 is not, therefore, a central plank of the Preferred Strategy.	No further action proposed at present, although results of the Welsh Government's M4 Corridor Enhancement Measures studies are awaited. LDP team to action.
	1.The RSPB disagrees fundamentally with the assertion of the SA (para 9.27-9.28, p152) that SSSIs fall into a category of the "need to minimise potential conflicts with the designation" through "mitigation measures". As stated in the main body of our representation, and in the covering letter, we do not believe, based on many years' experience in this matter, that mitigation to the point where adverse impacts become trivial or inconsequential, can be successful or workable. Furthermore, we question use of the terms "mitigation" and "seek to reduce the effects of development on environmental considerations". The local planning authority itself admits that SSSIs are part of Newport's "Critical Natural Capital", and are irreplaceable. We believe that the approach adopted in the Preferred Strategy, and the SA to be contrary to national planning policy.	The SA includes consideration of designated sites as well as other sites important for biodiversity. It is not considered appropriate at the strategic level to include all types of designation available.	The SA reflects the need to avoid effects as well as encourage mitigate and compensation.

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	2. The list of “designations and assets” at para 9.28 of p152 does not include habitats of acknowledged nature conservation concern. This is a major omission, and one which weakens the thrust of the SA, especially in respect of the Coastal and Floodplain Grazing Marsh UKBAP Priority Habitat, for which Newport is the largest location in Wales. Similarly, the site by site assessment of Candidate Sites against the SA Objectives Criteria (p160) is deficient because the latter do not include habitats of acknowledged nature conservation concern.	The SA includes consideration of designated sites as well as other sites important for biodiversity. It is not considered appropriate at the strategic level to include all types of designation available.	No further action.
	3. Recommendations by Site:		
	1.Sloblands: The RSPB supports the recommendation that the boundary of this Candidate Site be at least 2km away from the SSSI.	Noted with thanks.	No further action necessary.
	5. Solutia: The RSPB supports the SA recommendation that the site is deleted	Noted with thanks.	No further action necessary.
	28. Duffryn: The RSPB supports the SA recommendation that only the brownfield element of the Candidate Sites in this area are pursued. However, this will depend on an interpretation of the term “brownfield” in this context. It is important to note that the SSSI consists entirely of greenfield land. The Duffryn Notes/Recommendations section (p173) is deficient because it does not refer to the fact that the area is partially within the SSSI (although this fact is referred to in the table on p161). It is further deficient because neither the table nor the Notes/Recommendations section refers to the fact that it is Coastal and Floodplain Grazing Marsh UKBAP Priority Habitat.	Agreed.	Protected areas are considered in the detailed assessment of policies as well as strategic considerations of the overall impact of development on biodiversity. This issue has been added to the detailed assessments.
	26. Llanwern: The SA is deficient in the way that the Notes/Recommendation section (p173) addresses this Candidate Site, in that it refers to the fact that it is partly within the SSSI, but then conflates this with landscape issues by stating :- “development should seek to enhance the landscape character of the area” In addition to the points raised above concerning “mitigation” of adverse impacts on the SSSI,	Agreed.	Protected areas are considered in the detailed assessment of policies as well as

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	enhancing the landscape character of the area can only come at the expense of the SSSI interest.		strategic considerations of the overall impact of development on biodiversity. This issue has been added to the detailed assessments.
	39. The Eastern Expansion Area (EEA): The way in which the SA addresses the EEA is deficient because it fails to identify that parts of it are within the SSSI, and therefore fails to recommend either deletion or removal of those elements within the SSSI (p176). Indeed, this is contradicted by the table on p160, which assigns the EEA a red square for environmental designations.	Agreed.	This issue has been added to the detailed assessments
	Tatton Farm: The SA is deficient because it does not subject the waste sites in the vicinity of Tatton Farm to the same degree of examination as the other Candidate Sites, on the grounds that the site is not shown as a Candidate Site and therefore no detailed maps are available in respect of it (p225). Again, the document is deficient in the way in which it addresses the SSSI interest in the possible vicinity of the sites, referring to "minimising" adverse effects.	Noted.	LDP team to provide SA team with further information on this site if necessary.
	Other Possible Allocations: The SA is deficient because it does not appraise the Southern Distributor Road (West) or the Percoed Reen proposed education allocation, although both of these are within the SSSI.	Noted.	LDP team to provide SA team with further information on this site if necessary.
Welsh Assembly Government	SA/SEA: We note that: - The Preferred Strategy has been subject to SA/SEA: supporting documentation (Atkins) 'Sustainability Appraisal/ SEA Initial Report' (Jan2010) (ISAR) – includes the environmental report - subject of current consultation. (+ SA/SEA Scoping Report Nov08). Strategic objectives, options and policies have been assessed.	Noted.	No further action necessary.
	Habitats Appropriate Assessment - Habitats Regulations Appraisal (HRA): We note that: - - the Preferred Strategy has been subject to HRA screening: supporting documentation (Atkins) the HRA Initial Screening Report for the Preferred Strategy (Jan2010) -subject of current consultation.	Noted.	No further action necessary.
	There is a number of nature conservation sites designated, or proposed to be designated, which require the highest level of protection. Newport has a number of European protected sites including the River Usk Special Area of Conservation (SAC), the Severn Estuary SAC, Special Protection Area	Noted.	No further action necessary.

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	and RAMSAR site.		
Robertson Francis	2.4 This paragraph emphasises the need "to keep existing communities together" yet seeks to give even stronger support to a Plan that establishes new communities beyond current residential zones. A stronger emphasis is needed to add vitality to current residential areas by diversifying housing stock and encouraging the expansion (and retention) of services and lifestyle needs; i.e. retail, community, and social. These communities are often well placed on key transport routes; i.e. Caerleon and Langstone, and would play a real part in "fostering development within the existing urban area". A new, more balanced assessment is required alluding to timescales and economics, which would very clearly identify what was sustainable and what was not. The Appraisal should emphasise more fully a balance of advantages between expanding existing settlements within the urban area and development in new residential locations. Existing locations enjoy long established and sustainable links to Newport Centre, but new sites will remain conjectural until proved otherwise; this should be clearly stated. Increased certainty of delivery within some of the many established housing areas should be objectively set against the perceived expectations of the eastern expansion plans.	Agreed.	Detailed SA has now been completed.
Richards, Mr S (Asbri Planning)	For the reasons discussed in the submission document and other forms submitted, we consider that Vision Objective 4 i.e."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." will not be met in the preferred strategy option ie, the sustainable development strategy which places an emphasis on urban, brownfield sites. The strategy as proposed will not deliver a sufficient range of housing, and will be concentrated on urban sites and to the east of the City. As such the Preferred Strategy will not provide for the needs of the whole population throughout Newport and surrounding settlements. The SA/SEA assessment of the Preferred Strategy in this context is, therefore, objected to as it clearly does not meet the objective	It is considered that a brownfield focused strategy would ensure the delivery of housing in the most sustainable locations, supporting local communities, and protecting the distinctive nature of existing settlements.	No further action.
Binnersley, Mrs A (Asbri Planning)	For the reasons discussed in the submission document and other forms submitted, we consider that Vision Objective 4 ie. "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." will not be met in the preferred strategy option i.e., the sustainable development strategy which places an emphasis on urban, brownfield sites.	Approach to assessment to be discussed with LDP team. The LDP team have considered sites on	Detailed assessment of LDP policies now available.

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	In the Initial Sustainability Report Appendices it is noted that the Candidate Site Register is included. It is unfortunate that the site subject to these representations (Ref 1501.C1) is included on the same sheet – Caerleon North and lies adjacent to the large site promotion at Park Farm, which is being promoted by Cordea Savills (Ref 1665.C1). This gives the impression that the two sites are related. In reality much of the land to the north of the submission site is not capable of development and Lodge Wood will need to be protected for landscape and nature conservation reasons. The strategy as proposed will not deliver a sufficient range of housing, and will be concentrated on urban sites and to the east of the City. As such the Preferred Strategy will not provide for the needs of the whole population throughout Newport and surrounding settlements. The SA/SEA assessment of the Preferred Strategy in this context is, therefore, objected to as it clearly does not meet the objective. Whilst it is appreciated that objections cannot be made to the factual elements of the Appendices, it needs to be emphasised that the two sites 1501.C1 and 1665.C1merit separate consideration and means of assessment. The Caerleon North site, is for, example, included in the Strategic Site Assessment in the Initial Sustainability Report, whilst the site being promoted at Parkwood House represents a relatively minor extension of the existing settlement pattern. The way in which both sites are presented is, therefore, misleading.	an individual basis.	
	SP1 - Sustainability 4.1This policy is objected to as a further criterion/objective should be added, ie “to provide a sufficient range and choice of housing land opportunities in Newport and its satellite settlements, including Caerleon, to meet requirements during the plan period.”	There is not considered to be justification for adding a detailed requirement on one specific land use and area to this strategic policy.	No further action required.
	SP4 - Countryside 4.2This Policy is objected to as it is not a Strategic Policy as it relates to settlement boundaries which have still to be determined through the Deposit Plan.	The Countryside policy will relate to those areas outside of the settlement boundary. The review of the boundary will form part of the deposit plan consultation available for comment.	No further action required.

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	SP8 – House Building Requirement 4.3 An objection is made as under iii) reference is made to “existing settlement boundaries”. This assumes that no review of the existing Unitary Development Plan boundaries will be made. The term “proposed settlement boundaries to be identified in the Deposit Plan” would be more appropriate.	The policy wording and review of the settlement boundary will form part of the deposit plan consultation available for comment.	No further action required.
	4.4The Policy is also objected to on the grounds that allowance should also be made for housing targets not being met at the latter stages of the UDP period. For the reasons described above, Strategic Policies SP1, SP4 and SP8 are objected to.	Housing performance will be regularly monitored, in accordance with national guidance, and this can trigger a review if necessary.	No further action required.
	5.1For the reasons discussed in the previous section, we consider that Objective 4 ie. “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.” will not be met in the preferred strategy option ie, the sustainable development strategy which places an emphasis on urban, brownfield sites.	It is considered that a brownfield focused strategy would ensure the delivery of housing in the most sustainable locations, supporting local communities, and protecting the distinctive nature of existing settlements.	No further action required.
	5.2The strategy as proposed will not deliver a sufficient range of housing, and will be concentrated on urban sites and to the east of the City. As such the Preferred Strategy will not provide for the needs of the whole population throughout Newport and surrounding settlements. The SA/SEA assessment of the Preferred Strategy in this context is, therefore, objected to as it clearly does not meet the objective.	See above.	Repeats comments
	5.3In the Initial Sustainability Report Appendices it is noted that the Candidate Site Register is	See above.	Repeats

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	included. It is unfortunate that the site subject to these representations (Ref 1501.C1) is included on the same sheet – Caerleon North and lies adjacent to the large site promotion at Park Farm, which is being promoted by Cordea Savills (Ref 1665.C1). This gives the impression that the two sites are related. In reality much of the land to the north of the submission site is not capable of development and Lodge Wood will need to be protected for landscape and nature conservation reasons.		comments
	5.4Whilst it is appreciated that objections cannot be made to the factual elements of the Appendices, it needs to be emphasised that the two sites merit separate consideration and means of assessment. The Caerleon North site, is for, example, included in the Strategic Site Assessment in the Initial Sustainability Report, whilst the site being promoted at Parkwood House represents a relatively minor extension of the existing settlement pattern. The way in which both sites are presented is, therefore, misleading.	See above.	Repeats comments
Corus UK Ltd (GVA Grimley)	We note that Paragraph 9.3 of the Initial Sustainability Appraisal Report confirms that the Newport Sites Assessment Methodology has led to the agglomeration of a number of candidate sites. Table 9.1 confirms that three separate candidate sites have been agglomerated to form one overall site known as Llanwern (Site 26 in Table 9.1 and Table 9.5). We object to the agglomeration of these three candidates sites and consider that the Corus Candidate site submission (Ref: 1420.C1) should be considered separately from the other two sites (Ref: 1669.C1 and 329.C1). The Corus Candidate site (Ref:1420.C1) comprises an inherently different proposition to the other two sites that it has been grouped with under the 'Llanwern' heading in the SA document. The Corus site comprises predominantly brownfield land, whereas the other two sites are both greenfield in nature.	Approach to assessment to be discussed with LDP team. The LDP team have considered sites on an individual basis.	Detailed assessment of LDP policies now available.
	We note that Table 9.5 provides a number of notes / recommendations for sites within the Llanwern sub heading. Many of the points made in the table can be mitigated appropriately as part of any future redevelopment of the site. The exact mitigation measures will depend on the mix of uses to be accommodated at the site. However, it is felt that there are no overriding issues detailed in Table 9.5 which could not be adequately mitigated. The Corus candidate site at Llanwern represents a large scale opportunity, where any redevelopment will be supported by a full range of technical investigations that address the issues outlined in Table 9.5. Such an approach is central to good development control procedures.	Agreed.	No further action necessary.
	The reference within Table 9.5 (site 26) in respect of the preference for previously developed land is supported to a certain extent. This issue would be improved significantly by identifying and analysing the performance of the Corus Candidate site in its own right and removing any linkage between it and the other two greenfield sites. It is acknowledged that the Corus site contains a small element of greenfield land. However, such parts of the site are likely to be important in the overall development opportunity presented by the site and could potentially be utilised for landscaping, buffer zones or ecological resources. It is therefore considered that the peripheral greenfield element of the Corus site be included within the overall development boundary.	Approach to assessment to be discussed with LDP team. The LDP team have considered sites on an individual basis.	Detailed assessment of LDP policies now available.

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	We consider that the Initial Sustainability Appraisal Report should be refined to ensure that the Corus candidate site (1420.C1) is considered on its own merit, and is not unduly prejudiced by the connection made between it and the two other sites in the 'Llanwern' area (sites 1669.C1 and 329.C1). Additionally, we would request that the Sustainability Appraisal makes it explicitly clear whether any further technical investigations are required to be undertaken by the candidate site promoters at this stage of the process. As set out above, it is our view that these matters can be appropriately dealt with as part of the planning application process and that none of the issues raised would prevent the allocation of the Corus Candidate site for mixed use redevelopment. We therefore request that this matter be clarified in Table 9.5 with the clear identification of any additional technical investigations / supporting documents that may be required from the candidate site should any of the issues raised in Table 9.5 be considered to prevent that cannot be adequately mitigated in any future redevelopment proposals.	Approach to assessment to be discussed with LDP team. The LDP team have considered sites on an individual basis.	Detailed assessment of LDP policies now available.
St Modwen Developments Ltd (GVA Grimley)	9.5 (in respect of Glan Llyn) It is noted that an assessment of the Strategic Sites has been undertaken in the Sustainability Appraisal, in order to demonstrate their compatibility with the Sustainability Appraisal objectives. Following this assessment, a number of detailed recommendations are made in Table 9.5 which highlight how the sustainability performance of each site can be improved. In terms of the comments and recommendations made for the Glan Llyn site, it is considered that these issues have already been fully addressed as part of the planning process in respect of the site's redevelopment.	The granting of detailed consents and the discharge of conditions is an ongoing process that will benefit from consideration of issues raised in the SA.	The detailed results of the SA are now available.
	The planning application process has examined in detail all development influences and issues associated with the site, including the site's proximity to the SSSI, the biodiversity potential of the site, flood risk matters and transportation issues. The redevelopment of the site has been found to be acceptable in respect of all matters. The site's redevelopment will deliver large scale community facilities (in the form of two primary schools and large areas of open space), as well as significant infrastructure improvements (in the form of new roads, a rail halt and a new bus service). The site will certainly not be 'self contained' and will integrate with the wider area through a series of linkages and public transport improvements. Overall, the redevelopment of the site will secure the sustainable urban regeneration of one of Wales' largest brownfield sites at a strategically important location for Newport and South East Wales. The inherent benefits of the development, and the rigorous consideration of all development influences and constraints that has been undertaken to date therefore needs to be explicitly recognised in the SA document. At present, Table 9.5 ignores many of the benefits that the site's redevelopment will bring about, as well as ignoring the technical investigations that have underpinned the site's	The development is a proposal of the adopted UDP, and has planning consent. The progressing of the development will benefit from consideration of issues raised in the SA.	The detailed results of the SA are now available.

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	promotion through the planning application process.		
	In light of the above, we suggest that the Sustainability Appraisal be updated to reflect the detailed work that has been undertaken to date at the Glan Llyn site. The notes and recommendations contained within Table 9.5 of the SA in respect of the Glan Llyn site have all been addressed during the comprehensive planning application process. Recognition of this work that has been undertaken will no doubt elevate the sustainability performance of the site against the sustainability objectives and allow for the document to be corrected throughout to reflect the fact that the Glan Llyn site should be identified as one of the most (if not, the most) sustainable Strategic Sites available. We would therefore request that the Glan Llyn site's sustainability performance is reflected more accurately in the SA.	See above.	See above.
Crindau Gateway Ltd (GVA Grimley)	25. The lack of inclusion of strategic sites within the Preferred Strategy is even more puzzling as clearly some assessment work has been undertaken - this is presented in the Sustainability Appraisal / Strategic Environmental Assessment (SA / SEA) prepared for NCC by Atkins. This document reviews the strategic sites put forward for inclusion in the LDP and what they can potentially deliver. Some assessment of their ability to make a strategic contribution to the LDP has therefore been done.	The Crindau Regeneration Site is shown on the Preferred Strategy diagram .	LDP team to action.
	26. The SA / SEA identifies how sites perform against the defined SA Objectives and recommends that 5 sites are de-allocated due to significant conflict with those objectives. The remaining sites are therefore deemed potentially able to contribute to the delivery of the preferred strategy – these should be included within the Strategy document accordingly.	The regeneration of Crindau is part of the plan's strategy.	LDP team to action.
	27. The results of the assessment are presented in a summary matrix using a 'traffic light' scoring system. Whilst this is welcomed, it fails to provide any substantial detail on the basis for the scores attributable to each site.	As a strategic level assessment, it is considered that this scoring system is sufficient for the purposes of SA.	No further action necessary.
	28. With respect of Crindau, the SA / SEA confirms what is included within the outline proposals. We are pleased to note that the CGL scheme scores well on the SA matrix with the majority of the SA criteria being marked as 'green'. It is noted that the site scores negatively for adequate water and sewerage infrastructure – a substantial level of detail on this issue was submitted as part of the planning application for the site, and it is recommended that this is reviewed by the Council to inform the SA further.	The SA team has not been given this information. Further detail with regards to infrastructural constraints is likely to occur as a result of comments by the EA.	This has been considered by the LDP team.
	29. Accompanying the SA matrix is a set of site specific notes and recommendations for those sites	The plan and its SA	This

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	considered to be of strategic importance. For the CGL scheme, it is noted that a recommendation is made to improve sustainable transport provision (walking, cycling and public transport) – reference should be made to the outline proposals on this point as adequate provision is proposed. The SA / SEA also recommends that no sleeping accommodation is provided on the ground floor of development at Crindau – however, no justification or reasoning is given for this statement. As the CGL scheme has been fully appraised from a flood risk perspective, and have an EA approved approach to mitigated flood risk, the basis for this recommendation is unclear.	need to deal with the principle of development, and not necessarily with the details of one particular scheme current at the time, which may change.	recommendation has been removed from the detailed policy appraisal of the sites and the assessment of sites.
	Conclusions 30. In overall terms, the aims and objectives of the Preferred Strategy are commendable. However it is considered that the document falls someway short of the level of detail (and the evidence behind that detail) required to provide a robust strategic framework to inform the development of the Deposit LDP. There appears to be a significant jump to be made from the Preferred Strategy to the detailed policies and provisions required within the Deposit LDP and we have serious reservations that this can actually be achieved.	Comments noted, and Welsh Government guidance may have a shift of emphasis towards more detailed Preferred Strategies in future.	LDP team to action.
UK Car Group (GVA Grimley)	Table 9.5- Recommendations by site We note that table 9.5 makes the following recommendations in respect of improving the sustainability performance of the Carcraft site: • 'Green Infrastructure could be used to enhance the ecological value of the site. • Housing should be located as far from road infrastructure as possible as part of the mix of uses.' We acknowledge these recommendations and can confirm that any redevelopment of the site would take such matters into consideration. The Candidate site submissions previously made for the Carcraft site sought allocation for mixed use development, to include residential (including student and elderly accommodation), employment, retail and leisure services. Accordingly, the detailed recommendations set out in Table 9.5 of the Sustainability Appraisal will be dependent upon the final mix of uses that would be accommodated at the site. These improvement measures would be dealt with at the planning application stage when the final mix and layout of uses is confirmed. Any planning application for the site will be informed by a range of technical investigations, including a noise assessment and ecological survey work (depending on the mix of uses proposed). Such technical investigations will therefore inform the redevelopment of the site. However, it is important to note that the recommendations for the site as set out in Table 9.5 would not preclude its allocation for mixed use redevelopment in the LDP. We therefore trust that the site will be allocated in line with the Candidate site submissions that have previously been made. In light of the above comments, we request that table 9.5 be updated to reflect the fact that the Carcraft site is considered to be inherently suitable for mixed use redevelopment and that the two	It is not the role of the SA to predict whether or not the recommendations will be implemented by individual developers of sites.	Recommendations for mitigation included in SAR

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	recommendations detailed in respect of improving the sustainability of the site would be dealt with as part of the planning application process. Should any further technical investigations be required to support the allocation we would be grateful for confirmation of this at the earliest opportunity.		
Technoplan Ltd (GVA Grimley)	Table 9.5 (in respect of Uskmouth/Sloblands) It is considered that all of the issues / recommendations raised in this document can be suitably mitigated as part of any redevelopment of the site. None of the issues identified are considered to preclude the allocation of the Sloblands site for employment led mixed use development. Any planning application for the redevelopment of the site will be supported by detailed technical investigations which will address (and where appropriate mitigate for) issues such as PROW's, impact on SSSI, flood risk, community services and archaeology. We request that the SA document makes it clear whether any additional information is required form the promoters of the candidate sites in order to address the issues raised during the SA process. As indicated above, it is felt that these issues can be addressed by suitable mitigation during the planning process and that the issues raised should not preclude the redevelopment of the Uskmouth / Sloblands area. Should any additonal technical investigations be required in order to enable the allocation of the sites then this should be clearly identified within Table 9.5.	It is not the role of the SA to predict whether or not the recommendations will be implemented by individual developers of sites.	Recommendations for mitigation included in SAR.
AB Asset Management Ltd (Kotzmuth-Williams)	Table 9.5 Recommendations by Site Concerns are raised about the grouping together of individual Site Representations into larger geographical areas. For example, the six proposed sites at Castleton, including Candidate Site 2070.C1, have been grouped together and assessed as one area, the conclusion (in Recommendations by Site in Table 9.5 at pages 174-175 of the Initial Sustainability Appraisal Report) being that “Taken together the sites are likely to have a significant effect on landscape and townscape as they pose a significant increase to the settlement” and that “proximity to the road may exacerbate and increase in traffic which will necessarily increase from such a substantial increase in housing in an out of town location”. These comments are considered to be somewhat misleading and disadvantageous as it is unlikely that all sites would be developed, and likely that individual sites will have varying degrees (positive and negative) of visual and other impact. It is important therefore that sites are considered on individual merit and assessed for specific effects in each particular case. It is clearly inappropriate to effectively rule out all potential site and development opportunities on the basis of a perceived overall effect. Revise and clarify the relevant text to include acknowledgement of the above points.	While each site will have individual characteristics, their geographical proximity also mean that they have many factors in common, and the combined approach helps to achieve an appropriate assessment of the overall situation.	No further action required.
	Table 10.6 Assessment Results Concerns are raised about the comments under Assessment Results: Explanations and Recommendations (in Table 10.6 at pages 219-220 of the Initial Sustainability Appraisal Report) which state that “The allowance of physical expansion of some villages may conflict with objectives to enhance landscape quality…”. Clearly, this would not necessarily be so in all cases, and it is	Agreed.	Detailed assessment results superseded previous results.

Respondent	Comments	Response	Action
	important therefore that sites are considered on individual merit and assessed for specific effects in each particular case as it is likely that there will be circumstances where there are opportunities to mitigate any existing adverse effects and enhance landscape quality through sympathetic scheme design and site development. Revise and clarify the relevant text to include acknowledgement of the above points.		Where recommendations have been taken into account is explained in the SAR.
Ballinger, Miss E	**Marshfield East 2050 C1 and 2050 C2 (and 1525 C3)** In response to the report produced by Atkins Limited for Newport City Council (January 2010) for the purpose of the Local Development Plan and as a Landowner and long term resident of the location identified I would appreciate your consideration of my views on the matter. Prior to the Public Meeting held in Castleton Village Hall on Thursday 22nd October I personally had no knowledge whatsoever of any proposals in respect of Land in 2050 C1 or 2050 C2 Site areas or any representation made to the Newport City Council, and to date as a Landowner have not appointed a personal representative. However, I would support such a development for the following reasons:	Noted by LDP team.	LDP team to action.
	1. Residential Development would present no danger to joining Newport as it would leave a substantial area of Greenbelt (several miles and land area of 1000¹s of hectares) between the village of Marshfield and Newport whereas the Sites proposed and described as West Marshfield (to the West of Marshfield Road) would erode what remains of the Greenbelt between Marshfield and Cardiff leaving just a very narrow strip.	Noted.	The LDP Deposit Plan policies protect the green belt.
	2. 2050 C2 is well bounded by existing public highway and is not considered to be of top grade agricultural land (Grade 2/3) and 2050 C1 also falls into this category.	Noted.	Considerations of this nature are included in the LDP.
	3. Incorporation of open space or commuter corridor in 2050 C2 would provide suitable pedestrian Links between existing residential housing and Church Lane and in particular St Mary¹s Church which hosts many community activities including Cubs/Scouts as well regular religious services. This could be provided by enlargement of existing public footpaths between Church Lane and Marshfield Road.	Noted.	Considerations of this nature are included in the LDP.
	4. As described in the Representational Detail - Newport City Council Land Development Plan 7/15 2009. The sites 2050 C1 2050 C2 have adequate local services, e.g. highways, bus services, schools and shops, so infrastructure capacity is understood to be in place.	Noted.	Considerations of this nature are included in the LDP.
	Finally, it is suggested that although Brownfield sites have been identified in other areas of Newport City which other than those currently providing employment/business facilities there are currently no such sites within Marshfield. It would therefore seem appropriate that with vision and considerate planning part of the Sites at 2050 C1/ C2 could well form a New Village Centre/Focal Point¹, particularly if small areas were designated as open space and linked to existing public footpaths, this	This is a comment for the LDP team. Village appraisals are being undertaken, these	Considerations of this nature are included in the LDP.

Respondent	Comments	Response	Action
	could well be considered an improvement for Marshfield residents without jeopardising its rural aspects.	will inform the assessment of candidate sites within village areas.	

info@atkinsglobal.com
www.atkinsglobal.com