

Consultation Report

Appendix 6 - Summary Report of Representations received on Deposit Plan

December 2013

NEWPORT
LOCAL DEVELOPMENT PLAN
2011-26



LOCAL
DEVELOPMENT
PLAN

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CITY COUNCIL
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Appendix 9

Introduction

The Council consulted on the original Deposit Plan in April 2012. 907 representations were received and have been responded to. The tables below note the number of representations received against each chapter, a summary of the key issues that the representations raised, plus the Council's recommendation on how the issues have been addressed.

Chapter 0 and 1 – Overview and a Picture of Evolving Newport

	Details
Visions and Objectives	30 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Vision does not note the true picture that Newport is in decline ▪ Support for vision, sustainable development strategy, reuse of brownfield land and the protection of the landscape, plus the conservation of protected sites and species ▪ Concern that sites with ecological value are allocated for development, particularly within the Gwent Levels SSSI
Council Recommendations	<ul style="list-style-type: none"> ▪ The introductory chapter has been rewritten to provide a better structured and more focussed start to the LDP ▪ The Vision has remained. The introductory chapter describes that Newport has a number of key issues to overcome and notes that the City has faced a challenging period, however, the vision is forward thinking and something to aspire to. ▪ A number of large employment site boundaries have been amended and no longer impose on areas of ecological value.
A Picture of Evolving Newport	1 representation received.
Key Issues Raised	<ul style="list-style-type: none"> ▪ Remove the reference to a potential airport in the Severn Estuary
Council Recommendations	<ul style="list-style-type: none"> ▪ The reference has remained. The Council is not allocating or promoting an airport in anyway. The text simply notes that an airport has been suggested, but this proposal is not part of the Council's jurisdiction and nor is it part of any Government Plan or Strategy.

Chapter 2 – Spatial Strategy and Strategic Policies

	Details
SP1 – Sustainability	19 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Raise the importance of recognising that not all brownfield sites are suitable for development due to ecological constraints. ▪ Support of the policy and underlying brownfield strategy. ▪ Propose the inclusion of the term green infrastructure to the policy. ▪ Two Greenfield sites of concern, Llanwern Village and Oak Court. ▪ Importance of considering rural areas when promoting and improving economic and social well being. ▪ Propose the release of some Greenfield sites to allow range and choice and viable developments. ▪ Sustainability appraisal is biased towards economic sustainability. ▪ Incorporate Air quality and Pollution considerations.
Council Recommendations	<ul style="list-style-type: none"> ▪ The importance of ecology on brownfield sites is noted within the Plan. ▪ Green infrastructure is noted within the Plan. ▪ The Policy has been amend to reflect he importance of the brownfield strategy. ▪ The Plan considers the importance of rural enterprise. ▪ The Plans allocations reflect he brownfield focused strategy with allocations that are deliverable and provide a range and choice. ▪ The Sustainability Appraisal in undertaken with detailed environmental assessment but this is done in the context of its socio-economic benefits.
SP2 – Health	5 representations received.
Key Issues Raised	<ul style="list-style-type: none"> ▪ Clarity required ▪ Potential to highlight green travel and enhanced connectivity in new developments ▪ Need for more emphasis on air quality impacts and issues of contaminated land.
Council Recommendations	<ul style="list-style-type: none"> ▪ Health Impacts Assessment and the opportunities for green travel provide a good evidence base for policies and objectives of the LDP ▪ AQMAs and contaminated land are referred to in Policy GP7 of the Plan
SP3 – Flood Risk	5 representations received.
Key Issues Raised	<ul style="list-style-type: none"> ▪ General considerations for development in the Internal Drainage Boards operational area. ▪ Insufficient information on the consequence of flood risk for a number of housing sites. ▪ Development should not increase the risk of flooding.

Council Recommendations	<ul style="list-style-type: none"> ▪ Guidance on appropriate contacts for flood risk and drainage has been added, including the need for appropriate buffer zones. ▪ The Strategic Flood Consequence Assessment has been updated to a Stage 3 assessment. Justification is set out for the allocations within the Plan.
SP4 – Water Resources	4 Representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Support for the Policy. ▪ Recommend the term ‘enhance’ is added to the Policy wording.
Council Recommendations	<ul style="list-style-type: none"> ▪ The Plan is clear on its objective to protect water quality. Compliance with the Water Framework Directive will mean that there is no deterioration in the water quality and enhance would be onerous on those developments that do not have an impact on quality.
SP5 – Countryside	27 representations received.
Key Issues Raised	<ul style="list-style-type: none"> ▪ General support for Countryside allocations within the Plan. ▪ Objection to Countryside allocation on various sites within the Plan.
Council Recommendations	<ul style="list-style-type: none"> ▪ Support noted. ▪ Not considered appropriate that sites be excluded from the Countryside allocation as there is no justification for those sites to be included within an allocation which would allow them to be developed.
SP6 – Greenbelt	9 representations received.
Key Issues Raised	<ul style="list-style-type: none"> ▪ Support for Green Belt allocation. ▪ Question evidence based used to justify extension of Green Belt. ▪ Exclude sites from Green Belt in order to allow sites to be developed.
Council Recommendations	<ul style="list-style-type: none"> ▪ Support noted. ▪ The strong development pressures on the land between the two cities and the narrowness of the undeveloped gap between them there is a need to establish an area of Green Belt between Newport and Cardiff in order to keep this land permanently open. The extension of the Green belt between the A48 and M4 is in response in continued pressure to develop the area from within the Authority area and pressure in the neighbouring Authority. In light of this sites should not be removed from the Green Belt which would serve to undermine it.
SP7 – Green Wedge	12 representations received.
Key Issues Raised	<ul style="list-style-type: none"> ▪ Support for Greenwedge allocation. ▪ Exclude sites form Green Belt in order to allow sites to be developed.
Council Recommendations	<ul style="list-style-type: none"> ▪ Support noted. ▪ Not considered appropriate that sites be excluded from the Greenwedge allocation as there is no justification for those sites to be included within an allocation which would allow them to be developed.

SP8 – Special Landscape Areas	21 Representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Support for the Policy and allocation of the proposed SLA's. ▪ Amendment of SLA boundary to reflect housing permission, development proposals. ▪ Concern over the justification of the allocation.
Council Recommendations	<ul style="list-style-type: none"> ▪ Designation process has been through the implementation of the approved SLA methodology and nationally consistent data provided by CCW.
SP9 – Conservation of the Natural, Historic and Built Environment	5 Representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Support for the Policy. ▪ Consider appropriate to note the wider benefits of biodiversity e.g. health. ▪ The Policy is overly onerous for all types of development.
Council Recommendations	<ul style="list-style-type: none"> ▪ The wider benefit of biodiversity is noted in the Plan, which is to be read as a whole. ▪ The Policy has been reworded to reflect the need to consider 'recognised' sites.
SP10 - House Building Requirement	24 Representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Restriction of brownfield strategy provides limited range and choice, developments proposed to overcome this ▪ Disagree with the three phasing limits proposed. ▪ Phasing to remain distinct within the three development periods. ▪ Insufficient evidence to support the level of housing growth and its move away from the regional apportionment figure, WG projections. Both over provision and under provision noted ▪ No justification as to the delivery rates against past supply rates, deliverability of allocations is questioned. ▪ The relationship of the housing supply to the overall strategy, employment provision and how allocations will support existing commitments is not set out here. ▪ No flexibility set for provision or estimate of small site supply. ▪ Under provision of housing within the Plan, under 5 year land supply according to Housing Land Availability Survey.
Council Recommendations	<ul style="list-style-type: none"> ▪ The brownfield led strategy does provide a range and choice across Newport of deliverable sites. Those proposals have been assessed as Alternative Sites. ▪ The three phasing limits set out what is expected within each period and are not treated as distinct periods. ▪ Evidence has been produced (Assessment of Housing Need, NLP) to justify the deviation from the WG

	<p>projections to the proposed housing supply figure as set out in the Plan. The LHMA has also been updated to set out the affordable housing need.</p> <ul style="list-style-type: none"> ▪ Delivery and implementation chapter and background paper set out the position for each allocation ▪ Small site estimation has been set out in the Housing Chapter. ▪ The most current JHLAS (2012) has published a land supply of over 5years.
SP11 – Eastern Expansion Area	7 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Transport impact of the Glan Llyn development needs to be assessed. ▪ Proposal Plans should clearly show the different elements of the Llanwern redevelopment area. ▪ Amend Policy SP11 to acknowledge future development potential of the Eastern Expansion Area. ▪ Amend Policy SP11 text to stress that regeneration of the former steelworks will be given priority. ▪ Objection to over reliance of housing in the East of Newport.
Council Recommendations	<ul style="list-style-type: none"> ▪ A Transport Assessment was submitted as part of the Glan Llyn development application. ▪ The Plan accurately reflects the planning permission area. ▪ The Plan addresses housing need for the plan period. ▪ Outline planning permission and reserved matters in some parts has been granted at the Glan Llyn site, with developers on site. The Plan will be updated to reflect this position. ▪ The Council's Strategy follows the search sequence approach advocated in Planning Policy Wales and allocates a range and choice of sites located throughout Newport.
SP12- Community Facilities	9 Representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Need for retention of and additional community facilities ▪ Suggestion that a community facility be provided at Langstone Court Road, Langstone ▪ Need to protect the Gwent Levels from inappropriate development
Council 31Recommendations	<ul style="list-style-type: none"> • Need to provide evidence before allocating sites in the LDP • Need to convert existing buildings rather than developing on greenfield sites • The outcome of the CIL will be decided corporately at NCC>
SP13 Planning Obligations	5 Representations received
Key Issues Raised	<ul style="list-style-type: none"> • Torfean Council and CCW requesting further liaison on CIL • Category B objection from Welsh Government relating to the Delivery of CIL and further explanation and timescales required

	<ul style="list-style-type: none"> Persimmon Homes advised that the text of this policy is ambiguous
Council Recommendations	<ul style="list-style-type: none"> The Infrastructure Plan will inform the LDP and forthcoming SPG on CIL prior to April 2014.
SP14 – Transport Proposals	4 representations received
Key Issues Raised	<ul style="list-style-type: none"> Support inclusion of biodiversity enhancement within transport proposals. By pass for Bassaleg/ Rhiwderin and Caerleon.
Council Recommendations	<ul style="list-style-type: none"> Support noted. The by-pass schemes for Bassaleg/ Rhiwderin and Caerleon are not considered appropriate in light of the level of development proposed in the two areas.
SP15 – Integrated Transport	No representations received
SP16 – Major Road Schemes	22 representations received
Key Issues Raised	<ul style="list-style-type: none"> Clarify why second M4 is not included in the list of major road schemes. Support for various major road schemes. Objection to major road schemes in environmentally sensitive areas. LDP should make clear what happens if development occurs without the requisite highway infrastructure.
Council Recommendations	<ul style="list-style-type: none"> The M4 is a Welsh Government transport proposal and the route has been shown on the LDP constraints map. Support noted. Policy GP5 sets out steps to be taken in order to mitigate the impact of development in environmentally sensitive areas. Any infrastructure necessary for development will be provided utilising S278 of the Highway Act 1980. CIL will be in place to help deliver the transport priorities of the Local Authority.
SP17 – Employment Land Requirement	4 representations received
Key Issues Raised	<ul style="list-style-type: none"> Support for the policy Request that traffic impact of the employment sites is assessed
Council Recommendations	<ul style="list-style-type: none"> All planning applications for EM1 employment sites and EM2 regeneration sites will be accompanied by transport assessments. Any negative transport implications will need to be mitigated.
SP18 – Employment Sites	5 representations received

Key Issues Raised	<ul style="list-style-type: none"> ▪ Support for the policy ▪ Potential over provision of employment land ▪ Request removal of employment sites with ecological value, particularly those which encroach on SSSIs
Council Recommendations	<ul style="list-style-type: none"> ▪ An Employment Land Review has been conducted and the amount of employment land has been revised and fully justified ▪ Significant areas of SSSI which were allocated as employment land have now been removed from the Plan.
SP19 – Urban Regeneration	2 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Support for policy
Council Recommendations	<ul style="list-style-type: none"> ▪ Support noted
SP20 – Retail Need	2 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ LDP policies should ensure that policies protect Commercial Street. Friars Walk scheme should complement Commercial Street and not substitute.
Council Recommendations	<ul style="list-style-type: none"> ▪ The LDP seeks to enhance the retail function of the City Centre. Policy R2 and Inset Plan 26 identify a large stretch of Commercial Street as Primary Shopping Frontage. The policy seeks to retain a strong retail presence along Commercial Street.
SP21 – Waste Management	2 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Reference to regional waste disposal, incineration, Prosiect Gwyrdd or processing at Llanwern should be removed.
Council Recommendations	<ul style="list-style-type: none"> ▪ Following a period of detailed tender evaluation the Viridor proposal at Trident Park, Cardiff, has been chosen as the preferred facility to provide a waste management solution for the five local authorities making up the Prosiect Gwyrdd partnership. The allocation on land South of Llanwern is to be deleted from the plan to reflect this position.
SP22 - Minerals	5 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Torfaen are not in a position tot take a portion of Newport’s RTS apportionment ▪ Proposed amendment to Policy wording, to include a reference to ‘landbank’ and favourable consideration of proposed workings to meeting RTS apportionment figure ▪ Support to the Policy
Council Recommendations	<ul style="list-style-type: none"> ▪ Torfaen’s situation is noted ▪ The policy wording has been updated to make the landbank and lack of ability to meet the RTS apportionment

	clear, rather than leave to the background paper.
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Chapter 3 – General Policies

	Details
GP1 – Climate Change	11 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Suggested amendment should include reference development that should be deigned to include green infrastructure or complement existing green infrastructure. ▪ Inappropriate to include requirement for low and zero carbon energy sources as it will be dealt with by Building Regulations and is difficult to achieve. ▪ Concern regarding practicalities of including renewable and low and zero carbon energy source.
Council Recommendations	<ul style="list-style-type: none"> ▪ Green Infrastructure is referred in paragraph 3.9. Furthermore Policy GP05 makes additional comment regarding Green Infrastructure. ▪ Criterion (ii) should remain as the Planning System can influence many of the factors which contribute to the incorporation of renewable and low and zero carbon energy sources. ▪ Criterion (iv) should not be deleted as elements of BREEAM and Code for Sustainable Homes are due to remain within the Planning remit. ▪ Change 'possible' in last line of criterion (ii) to 'practicable' in order that the policy is not overly burdensome.
GP2 – General Amenity	1 representation received
Council Recommendations	<ul style="list-style-type: none"> ▪ No key issues raised.
GP3 – Service Infrastructure	5 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Should be amended so that only development including private sewerage treatment which does not impact Gwent Levels SSSI will be allowed. ▪ Provision of private foul drainage in sewered area is contrary to EA policy and PPW. ▪ Criterion (ii) would delay development.
Council Recommendations	<ul style="list-style-type: none"> ▪ Reference is made in the policy to 'system without risk to the water environment'. ▪ Policy does state that private sewerage in sewered area is unacceptable. ▪ Policy text was considered overly restrictive, and has been amended.
GP4 – Highways and	6 representations received

Accessibility	
Key Issues Raised	<ul style="list-style-type: none"> ▪ Criterion (vi) of GP04 should be deleted as it makes reference to SPG and national guidance. ▪ Highlighted importance of new development providing adequate parking provision.
Council Recommendations	<ul style="list-style-type: none"> ▪ The policy makes reference to the 'Gwent Design Guide, Residential and Industrial Estate Roads. 2nd Edition, 1993', which is not SPG but is an adopted Council document, and is referenced in order to provide clarity on the standards expected in relation to those issues covered by the guidance. ▪ The Policy makes reference 'Gwent Design Guide, Residential and Industrial Estate Roads. 2nd Edition, 1993', which sets out the standards expected of new development.
GP5 – Natural Environment	12 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Criterion (ii) should be redrafted in order to improve comprehension. ▪ Archaeologically Sensitive Areas should be shown on the constraints plan of the LDP. ▪ Clarification on the illustration of designations on the Constraints Plan. ▪ Amend boundaries on the Constraints Plan in the interest of accuracy. ▪ Include allocations on Constraints Plan which have been overlooked. ▪ SINCs should be included on the Constraints Plan. ▪ Criterion (ii) would be strengthened through reference to the mitigation hierarchy.
Council Recommendations	<ul style="list-style-type: none"> ▪ It is considered that the current wording of the policy reflects the points raised in the representation and the features, species and habitats are satisfactorily covered in the current wording. ▪ Archaeologically Sensitive Areas are denoted on the Proposals Plan because they are produced by the Council through its archaeological experts. ▪ Amend the appearance of boundaries on the constraints plan in order to ensure clarity. ▪ Amend boundaries on Constraints Plan to ensure accuracy. ▪ Include allocations on the Constraints Plan which have been overlooked. ▪ SINCs will be shown in a separate SINC SPG. ▪ Criterion (ii) is clear and the range of nature conservation interest features adequately covered within the policy.
GP6 – Quality of Design	3 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Detailed design guide should be reserved for SPG. ▪ Design Policy should reference Code for Sustainable Homes.
Council Recommendations	<ul style="list-style-type: none"> ▪ Text of policy does not need to be reduced as it covers standard design principles and provides a hook to SPG.

	<ul style="list-style-type: none"> Reference is made to BREEAM and Code for Sustainable Homes elsewhere in the LDP and in national guidance.
GP7 – Environmental Protection and Public Health	4 representations received
Key Issues Raised	<ul style="list-style-type: none"> A requirement to perform Environmental Impact Assessment/ Health Impact Assessment/ and or Preliminary Risk Assessment should be included in the Policy. Requirement for the Policy to consider wider Environmental Health issues including odour impacts, loss of amenity, and reference to 'Noise Action Planning Priority Areas and Quiet Areas'.
Council Recommendations	<ul style="list-style-type: none"> Add additional text to the Policy in order to highlight potential need for 'Preliminary Risk Assessment'. Add reference in Policy to the preparation of 'Noise Action Plans' and 'Quiet Areas'. The list in the Policy is not exhaustive and issues such as odour will be considered subject to the nature of individual developments. The issue of loss of amenity is considered under Policy CE5.

Chapter 4 – Environment

	Details
CE1 – Development in the Green Belt	5 representations received
Key Issues Raised	<ul style="list-style-type: none"> Delete reference to development for mineral working within the Green Belt. Support measures to protect the countryside. Land rear of the Meadows/Mallards Reach, Marshfield should be removed from the Green Belt. Support the northern extension of the Green Belt designation.
Council Recommendations	<ul style="list-style-type: none"> Mineral working within a Green Belt would be for a set timescale and provided appropriate environmental standards and restoration works are applied the long term openness of the Green Belt should not be prejudiced. Reference to mineral extraction and subsequent environmental standards and restoration works are considered necessary and to be in accordance with national guidance. Support for protection and Green Belt extension noted. Allocation of land rear of the Meadows/Mallards Reach is considered to be contrary to the Council's overall LDP Strategy and is not needed to meet housing requirements. To avoid repetition in the Plan, Policies CE01 and CE02 have been merged.

CE2 – Development in Green Wedges	3 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Support for the protection of the countryside. ▪ Delete reference to development for mineral working within the Green Wedge. ▪ Owners of candidate site at Ty Melyn Allotments do not support the candidate site submission.
Council Recommendations	<ul style="list-style-type: none"> ▪ Mineral working within a Green Wedge would be for a set timescale and provided appropriate environmental standards and restoration works are applied the long term openness of the Green Wedge should not be prejudiced. Reference to mineral extraction and subsequent environmental standards and restoration works are considered necessary and to be in accordance with national guidance. ▪ Land at Ty Melyn Allotments has not been allocated for development in the LDP. ▪ To avoid repetition in the Plan, Policies CE01 and CE02 have been merged.
CE03 – Routeways, Corridors & Gateways	3 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Support for the Policy.
Council Recommendations	<ul style="list-style-type: none"> ▪ Support noted.
CE04 – Waterfront Development	4 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Importance of the Monmouthshire and Brecon Canal should be clearly stated. ▪ Policy should be split to cover the promotion of water based recreation and restoration of the canal separately. ▪ Nature conservation and SAC status of the River Usk should be included in the supporting text. ▪ Consider the policy to be sound.
Council Recommendations	<ul style="list-style-type: none"> ▪ Additional text to be added to the plan to highlight the importance of the Monmouthshire and Brecon Canal. ▪ Monmouthshire and Brecon Canal to be added to Policy CE03 – Routeways, Corridors and Gateways. ▪ Reference to the nature conservation interests of the River Usk is addressed elsewhere in the Plan.
CE05 Environmental Spaces	15 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Support for the policy. ▪ Term Environmental Space should be expanded to include corridors. ▪ Support and objection to the allocation of an Environmental Space on Land at Bethesda Close. ▪ Reference should be made to the Monmouthshire & Brecon Canal in paragraph 4.7. ▪ Suggest allotments are also identified as Environmental Spaces.

	<ul style="list-style-type: none"> ▪ Delete criterion iii) which refers to no loss of Spaces without appropriate replacement. ▪ Plan should have undertaken an Open Space Assessment as required by TAN 16. ▪ Remove Environmental Space designations at Senyd Lodge and St Cadocs. ▪ Clarification should be given on the type of community food production schemes that would be acceptable and they should not impact on nature conservation interests.
Council Recommendations	<ul style="list-style-type: none"> ▪ Policy wording expanded to Environmental Space and Corridors. ▪ Environmental Space designation on Land at Bethesda Close has been removed to reflect the planning permission granted on appeal for residential development. ▪ Agree to add reference to the Monmouthshire & Brecon Canal. ▪ Allotments are covered by a different policy designation to clearly identify their specific function. ▪ The approach taken in the identification of the Environmental Spaces and wording of Policy CE05 is considered to be in accordance with PPW and TAN16: Sport, Recreation and Open Spaces. ▪ Environmental Spaces at Senyd Lodge and St Cadoc's Hospital are to be retained in the Plan. ▪ Clarification had been given to the term Community Food Production to be in the form of community gardens. ▪ Nature conservation issues are covered by Criterion iii) of Policy CE05 and other policies in the Plan.
CE06 – Shopfronts	1 representation received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Shopfront design issues are adequately covered by the general policy on design. Specific shopfront issues could be addressed in Supplementary Planning Guidance (SPG).
Council Recommendations	<ul style="list-style-type: none"> ▪ Agree to delete policy and move supporting text to Policy GP06 – General Development Principles – Quality of Design. Additional design information will be contained in SPG.
CE07 – Signs and Advertisements	3 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Signs and Advertisement issues are adequately covered by the general policy on design. More detailed policy guidance could be set out in Supplementary Planning Guidance (SPG). ▪ Policy is overly restrictive.
Council Recommendations	<ul style="list-style-type: none"> ▪ Agree to delete policy and move supporting text to Policy GP06 – General Development Principles – Quality of Design. Additional design information will be set out in SPG. ▪ Paragraph 4.17 of the Deposit Plan (April 2012) will be deleted. Reference to 'advertising hoarding' will be added to paragraph 4.16, which is to be moved to support Policy GP06 – Quality of Design.
CE08 – Historic Landscapes, Parks, Gardens and Battlefields	6 representations received

Key Issues Raised	<ul style="list-style-type: none"> ▪ Support for the policy. ▪ Historic landscapes, Parks, Gardens, Battlefields should be shown on Proposals Map. ▪ Plan should clarify that development of more than local significance will require an Assessment of the Significance of the Impact of Development on Historic Landscape (ASIDOHL2). ▪ Reference to Garden History Society should be replaced with Welsh Government's Historic Environment Service.
Council Recommendations	<ul style="list-style-type: none"> ▪ The relevant layers are shown on the Constraints Plan as they are constraints identified by external organisations rather than proposals of the Council. ▪ Agree to add reference to the Assessment of the Significance of the Impact of Development on Historic Landscape. ▪ Agree to refer to Welsh Government's Historic Environment Service.
CE09 – Locally Listed Buildings and Sites	No representations received.
CE10 – Archaeologically Sensitive Areas	1 representation received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Support for policy.
Council Recommendations	<ul style="list-style-type: none"> ▪ Support noted.
CE11 – Conservation Areas	No representations received.
CE12 – Locally Designated Nature Conservation and Geological Sites	4 representations received.
Key Issues Raised	<ul style="list-style-type: none"> ▪ Support for policy. ▪ Locally designated sites should be shown on the proposals plan. ▪ Policy should be amended to ensure there is no overall loss of the nature conservation resource and development delivers a net biodiversity benefit.
Council Recommendations	<ul style="list-style-type: none"> ▪ Support noted. ▪ Given the size and number of the locally designated sites, particularly SINC's, for clarity these are shown in a separate document which allows the sites to be clearly viewed and updated as necessary. ▪ Policy is considered to be in accordance with TAN 5 (2009) and adequately protect locally designated sites.

CE13 – Coastal Zone	5 representations received.
Key Issues Raised	<ul style="list-style-type: none"> ▪ Support the protection of the Coastal Zone. ▪ Coastal Zone should extend along the River Usk to Newport's administrative boundary. ▪ Object to Tata owned land being included within the designation Coastal Zone. ▪ Developed coastal zone should be extended to include the full extent of the Newport Docks area.
Council Recommendations	<ul style="list-style-type: none"> ▪ The boundary included in the Shoreline Management Plan (which the coastal zone boundary is based on) does not provide a clear boundary therefore the coastal zone boundary set out in the Deposit Plan is considered appropriate. ▪ The area identified as undeveloped Coastal Zone, including Tata Steel land, reflects the sensitive coastal environment of the Caldicot levels up until the settlement boundary and provides a clear distinction between the developed and undeveloped area. ▪ Agree to extend the developed coastal zone boundary to cover the extent of Newport Docks.
CE14 – Renewable Energy	7 representations received.
Key Issues Raised	<ul style="list-style-type: none"> ▪ Support for policy. ▪ Recommend that the supporting text refers to the potential need to undertake a Habitats Regulations Assessment (HRA). ▪ Include the Capacity Study listed in supporting text to the list of Background Paper and Technical Reports. ▪ Schedule 2 of the 1995 General Permitted Development Order gives rights to householders in respect of certain renewable energy technologies – Plan should reflect this. ▪ Reference should be given to whether it is appropriate to introduce Article 4 directions removing PD rights which could be at risk from the cumulative impact of renewable energy technologies.
Council Recommendations	<ul style="list-style-type: none"> ▪ Support noted. ▪ HRA required are addressed elsewhere in the Plan. ▪ Agree to add reference to the Capacity Study in the list of Background Papers and Technical Reports. ▪ Renewable Energy proposals covered by Permitted Development Rights would not be assessed against LDP policies. ▪ The policy does not preclude the introduction of Article 4 Directions.

Chapter 5 – Housing

	Details
H1 – Housing Sites	137 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ More justification required for a number of allocations due to flood risk ▪ Support for Policy. ▪ Allocate new development sites across Newport for increased supply (dealt with as Alternative Sites). ▪ Support for allocation at Monmouthshire Bank Sidings, need to delete joint SPG with Whiteheads. ▪ Note that any new development in Glan Llyn will need to consider the impact on SSSI ▪ Object to more development in Rhwiderin and Rogerstone, specifically Alcan on traffic grounds. ▪ Object to development in Caerleon due to impact on traffic and flood risk grounds ▪ Require flexibility to policy to allow health care uses on Whitehead works. ▪ Question the deliverability of sites, insufficient evidence for oversupply. ▪ Delete allocations at Woodlands site and Hartridge Farm road, not needed and impact on SINC. Alternative use on Hartridge Farm road proposed for health care use.
Council Recommendations	<ul style="list-style-type: none"> ▪ The Strategic Flood Consequence Assessment and associated background paper sets out the justification for allocations within flood risk zones. ▪ Alternative Sites have been dealt with and full assessments and conclusions can be found in the initial consultation report. ▪ The deliverability and implementation of site allocations is dealt with in Chapter 13 of the Plan, and the relevant background paper. ▪ Support is noted and the SPG reference deleted. ▪ The Plan adequately covers potential impacts on ecological allocations, traffic and flood risk. ▪ The proposed deletions are not supported and the delivery of the alternative health care use in Ringland is not evidenced.
H2 – Housing Standards	3 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ There is a need for new development to accommodate energy generation through design.
Council Recommendations	<ul style="list-style-type: none"> ▪ The Plan adequately reflects the need to consider renewable energy in developments.
H3 – Housing Mix and Density	No representations received
H4 – Affordable Housing	7 representations received

Key Issues Raised	<ul style="list-style-type: none"> ▪ There is no affordable housing target in the Plan. ▪ It is unclear on how the Plan will meet its affordable housing requirement. ▪ The viability and flexibility of the affordable housing provision is not clear. ▪ The reasoning behind the affordable housing requirement is not clear.
Council Recommendations	<ul style="list-style-type: none"> ▪ The Local Housing Market Assessment has been updated. ▪ An affordable housing target has been set out in the plan. ▪ The provision of affordable housing from Section 106 agreements has been noted in the Plan. ▪ The 30% threshold is justified in the affordable housing background paper and the Plan, it reflects the high level of need across Newport. ▪ The Policy allows viability to be calculated on a site by site basis providing flexibility.
H5 – Affordable Housing Rural Exceptions	3 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Reference to Gypsy and Traveller accommodation should be removed. ▪ The policy should be reworded so that Green Wedges and Green Belt sites are avoided.
Council Recommendations	<ul style="list-style-type: none"> ▪ The reference to Gypsy and Traveller accommodation is considered suitable within this policy because it is considered to be a form of affordable housing. ▪ Wording has been amended to reflect that the Green Wedge and Belt areas are avoided.
H6 - Sub-division of Curtilages, Infill and Backland Development	No representations received
H7 - Annexes to Residential Dwellings	No representations received
H8 - Self Contained Accommodation and Houses in Multiple Occupation	2 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ There is a problem with parking with HMOs which should be recognised. ▪ The detrimental impact of HMOs needs to be noted. ▪ Link provided to the licensing scheme for HMOs.
Council Recommendations	<ul style="list-style-type: none"> ▪ Parking consideration is adequately dealt with in the Policy. ▪ Detrimental impact of HMOs is noted in the Policy. ▪ Reference to the licensing scheme is considered unnecessary.

H9 - Housing Estate Regeneration	3 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Further flood justification required at Alcan site.
Council Recommendations	<ul style="list-style-type: none"> ▪ The Stage 3 SFCA notes the FCA associated with the current planning application on the site for residential development.
H10 - Conversions in the Countryside	5 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Reference to protected species is welcomed, but the provision of additional text for survey requirements is missing. ▪ Questioning the 30 year timescale for residential conversion. ▪ Amend the policy to allow conversion for residential holiday lets.
Council Recommendations	<ul style="list-style-type: none"> ▪ Reference to the Wildlife and Development SPG has been added. ▪ The timescale is considered adequate as architectural merit is reference in the Policy. ▪ National Planning Policy provides adequate provision for such rural development.
H11 - Outbuildings and Extensions to Conversions	No representations received
H12 - Replacement Dwellings in the Countryside	1 representation received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Consider the Policy meets the test of Soundness.
Council Recommendations	<ul style="list-style-type: none"> ▪ Noted.
H13 - Extensions to Dwellings in the Countryside	3 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Overly restrictive threshold for extensions in the Countryside.
Council Recommendations	<ul style="list-style-type: none"> ▪ National Planning Policies note that development in the Countryside should be controlled, policy denotes how this is to be controlled.
H14 – Caravans	No representations received
H15 - Gypsy and Traveller Transit Accommodation	8 representations received generally commenting on this policy 10 representations were received relating to the proposed site at Pound Hill Coedkernew

	45 representations were received relating to the proposed site at Queensway Meadow
Key Issues Raised	<ul style="list-style-type: none"> ▪ Support for the Policy ▪ Policy should clearly identify that site will accommodate identified need ▪ Inappropriate nature of the sites for Gypsy and Traveller accommodation mainly due to amenity, green wedge and flood risk issues at Queensway Meadow.
Council Recommendations	<ul style="list-style-type: none"> ▪ In Summer 2012 an Overview and Scrutiny Review exercise revisited the site selection process at the request of the Council's Cabinet. It transparently determined which sites most complied with Welsh Government criteria for where such sites should be located and then recommended which sites should feature in the LDP. ▪ The OSF Committee for Community Planning and Development has recommended that a site at Celtic Way, Marshfield should be allocated in the LDP for Gypsy and Traveller transit accommodation purposes. 7 pitches would be provided at this site to cover the Plan period to 2026. The final decision on which sites will feature in the Revised Deposit LDP will be made on 4th June 2013 when Full Council considers the entire contents of the LDP.
H16 - Gypsy and Traveller Residential Accommodation	6 representations were received generally commenting on this policy 3 representations were received relating to the proposed site at Yew Tree Cottage 44 representations were received relating to the proposed site at the Former Army Barracks, Pye Corner 47 representations were received relating to the proposed site at the Former Army Camp, Pye Corner
Key Issues Raised	<ul style="list-style-type: none"> ▪ Support for the policy ▪ Inappropriate nature of the sites for Gypsy and Traveller residential accommodation purposes mainly due to flood risk and amenity issues.
Council Recommendations	<ul style="list-style-type: none"> ▪ In Summer 2012 an Overview and Scrutiny Review exercise revisited the site selection process at the request of the Council's Cabinet. It transparently determined which sites most complied with Welsh Government criteria for where such sites should be located and then recommended which sites should feature in the LDP. Over 7,100 responses were received when the Council consulted on this review exercise. ▪ The OSF Committee for Community Planning and Development has recommended that a site at Hartridge Farm Road should be allocated in the LDP for Gypsy and Traveller residential accommodation purposes with a site at the Former Ringland Allotments acting as a contingency site for the Plan period. 17 Pitches would be provided initially with a further 10 pitches being phased over the plan period to 2026. The final decision on which sites will feature in the Revised Deposit LDP will be made on 4th June 2013, when Full

	Council considers the entire contents of the LDP.
H17 - Gypsy and Traveller Accommodation Proposals	40 representations were received commenting on this Policy as proposed in the Deposit Plan (April 2012)
Key Issues Raised	<ul style="list-style-type: none"> ▪ Blanket objection to all Gypsy and Traveller policies in the LDP. ▪ Support for the policy as worded ▪ Clarity on wording required ▪ Fears from local businesses ▪ Flooding and amenity issues highlighted.
Council Recommendations	<ul style="list-style-type: none"> ▪ Responses on site objections are provided under Policies H15 and H16. Clarity on the wording of the Policy has been provided in individual Council Responses.

Chapter 6 – Employment

	Details
EM1 – Employment Land Allocations	32 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Potential over provision of employment land ▪ Support for employment land allocations ▪ Allocation of new employment land and new district centres at West Way and 28 East Road ▪ Allocation of new employment land and leisure facilities at North East coldra. ▪ Request removal of employment sites with ecological value, particularly those which encroach on SSSIs ▪ Caution that some employment sites are cross by high voltage overhead power lines.
Council Recommendations	<ul style="list-style-type: none"> ▪ An Employment Land Review has been conducted and the amount of employment land has been revised and fully justified ▪ Significant areas of SSSI which were allocated as employment land have now been removed from the Plan ▪ The Colliers 2010 Study does not recommend any additional District Centres ▪ Developers will be encouraged to view and comply with the National Grid's guidance as part of the planning application process.
EM2 – Regeneration Sites	17 representations received

Key Issues Raised	<ul style="list-style-type: none"> ▪ Support for the regeneration site allocations ▪ Proposal to allocate Imperial Park for retail and Land at Usk Way as a mixed use regeneration site ▪ Request to broaden policy wording for site EM2(iii) Llanwern Former Tipping Area to allow further development opportunity ▪ Additional strategic flood risk consequences work requested for EM2 (ix) Crindau and EM2 (xii) Novelis ▪ Suggestion that EM2 (x) Whitehead Works cannot deliver an onsite primary school and have a viable development
Council Recommendations	<ul style="list-style-type: none"> ▪ Out of town retail at Imperial Park is not acceptable as it would be contrary to both national and local policies ▪ Site EM2 (v) has been extended to allocate additional land at Usk Way ▪ Policy wording for EM2 (iii) includes B1, B2 and B8 Use. It is considered this is broad enough. The Council would be resistant to amending the policy to allow residential development in this area. ▪ Further flood analysis has been conducted for Crindau and Novelis. As a result, the housing allocation at Crindau has been removed from the H1 policies. Novelis has remained as per the original Deposit Plan. ▪ The primary school at the proposed Whitehead Works development remains a Council requirement.
EM2 – Regeneration Sites	2 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Minor amendments to text ▪ Request to amend policy to consider the wider benefits from permitting alternative uses to employment sites
Council Recommendations	<ul style="list-style-type: none"> ▪ Policy EM3 has been slightly amended following the publication of the Employment Land Review. The policy is now renumbered EM4 and a new criterion has been added to consider on-going site viability when determining changes to employment land use.

Chapter 7 – Transport

	Details
T1 - Railways	10 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Support for the Pye Corner Station and the re-opening of the Ebbw Vale to Newport link. ▪ Object to the proposed train station at Coekernew as it is within the St Brides SSSI. ▪ Object to the proposed train station at St Cadoc's Caerleon. ▪ Proposed train stations should be individually labelled on the Proposals Plans.
Council Recommendations	<ul style="list-style-type: none"> ▪ Support for stations noted. ▪ The proposed Coedkernew station is identified in the SEWTA S E Wales Transport Plan. The Plan sets out

	<p>policies to assess impact on the SSSI and nature conservation interests.</p> <ul style="list-style-type: none"> ▪ Agree to individually label the train stations on the Proposals Plans. ▪ The proposed St Cadoc's train station is identified in the SEWTA S E Wales Regional Transport Plan.
T2 – Heavy Commercial Vehicle Movements	2 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Transport Plans should consider the wider effects of heavy vehicles.
Council Recommendations	<ul style="list-style-type: none"> ▪ Policy SP15 sets out requirements for Transport Assessments.
T3 – Road Hierarchy	No representations received.
T4 – Parking	1 representation received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Support for the requirement to provide sufficient parking.
Council Recommendations	<ul style="list-style-type: none"> ▪ Support noted.
T5 – Walking and Cycling	4 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Support for the Walking and Cycling Policy ▪ Objection to the proposed alignment of the walkway/cycleway through the Former Tredegar Park Golf Course.
Council Recommendations	<ul style="list-style-type: none"> ▪ Support noted. ▪ The Plan notes that routes are indicative.
T6 – Public Rights of Way Improvement	2 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Support for the policy.
Council Recommendations	<ul style="list-style-type: none"> ▪ Support noted.
T7 – Public Rights of Way and New Development	1 representation received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Support for the policy.
Council's Response	<ul style="list-style-type: none"> ▪ Support noted.
T8 – All Wales Coast	2 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Support for policy.
Council's Recommendations	<ul style="list-style-type: none"> ▪ Support noted.

Chapter 8 – Retailing and the City Centre

	Details
R1 – City Centre Schemes	3 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Commercial Street should be protected against the effects of the Friar Walk development. ▪ City Centre Inset Plan and para 8.4 should be updated to reflect the extant planning permission for the Friars Walk Scheme.
Council Recommendations	<ul style="list-style-type: none"> ▪ The LDP seeks to enhance the retail function of the city centre. Policy R2 and Inset 26 identify a large stretch of Commercial Street as Primary Shopping Frontage. These seek to retain a strong retail presence along Commercial Street. ▪ Agree to allocate the city centre redevelopment scheme on Inset Plan 26.
R2 – Primary Shopping Frontage	No representations received
R3 – Non-Retail Uses in Secondary City Centre Shopping Areas	1 representation received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Support the reduction to the extent of the secondary frontage area.
Council Recommendations	<ul style="list-style-type: none"> ▪ Support noted.
R4 – Non-Retail Uses in Other City Centre Shopping Areas	No representations received
R5 – Retail Proposals in District Centres	3 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Ringland should be reallocated as a District Centre as per the UDP. ▪ Newport Retail Park (NRP) District Centre Boundary should be extended to include the Megabowl and other town centre uses excluded in the LDP.

	<ul style="list-style-type: none"> ▪ NRP should be included in the list of district centres - there is not justification for Policy R6 & R7.
Council Recommendations	<ul style="list-style-type: none"> ▪ Supporting evidence for the district/local centre classifications is set out in the Colliers Retail Assessment (June 2010). This concludes that the Ringland shopping centre functions as a local centre, serving the local community. ▪ The preparation of the Local Development Plan is an appropriate time to review boundaries defined in the Plan. Accordingly a review of all the district centre boundaries has been undertaken for the preparation of the LDP. The approach of Newport City Council taken towards Newport Retail Park seeks to accurately place it in the retail hierarchy for the application of the sequential test and reflect its role – to provide local shopping facilities for the Eastern Expansion Area.
R6 – Newport Retail Park District Centre	9 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Object to Newport Retail Park being allocated as a District Centre. ▪ Object to reduction in Newport Retail Park boundary, amend to include Mataln, Dutton Forshaw & land adjacent Severn Stiles Avenue. ▪ Delete Policy R6 as it is contrary to Planning Policy Wales. ▪ Support the Council's approach to Newport Retail Park – further growth would prejudice the retail hierarchy.
Council Recommendations	<ul style="list-style-type: none"> ▪ A separate policy approach to Newport Retail Park is considered appropriate given the scale of retailing in and around the Retail Park and its clear capacity to perform a much wider role. ▪ Advice has been sought from Colliers International on an appropriate policy response to Newport Retail Park. Colliers' full reply is set out in the document titled Newport Retail Park Representations – Feb 2013. Policies R6 & R7 of the Deposit LDP are to be deleted and replaced with a new policy that seeks to allow development appropriate to a district centre, and in accordance with Planning Policy Wales, while protecting the vitality and viability of the city centre. ▪ The preparation of the LDP is an appropriate time to review boundaries defined in the Plan. Accordingly, a review of all district centre boundaries has been undertaken for the preparation of the LDP. The approach taken towards NRP seeks to accurately place it in the retail hierarchy for the application of the sequential test and reflect its role – to provide local shopping facilities for the EEA.
R7 – Newport Retail Park District Centre Proposals	4 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Policy R7 seems to run counter to Policy R6 which states there is to be no new retail development in NPR. ▪ NPR should be redefined as an Out of Centre Retail Park as cannot restrict retail floorspace within a defined centre.

	<ul style="list-style-type: none"> ▪ NPR should not be subject to any additional restriction compared with any other District Centres - Policy should therefore be deleted.
Council Recommendations	<ul style="list-style-type: none"> ▪ Newport Retail Park was established as a district centre in the Unitary Development Plan, Eastern Expansion Area Development Framework SPG and subsequent appeals. ▪ A separate policy approach to Newport Retail Park is considered appropriate given the scale of retailing in and around the Retail Park and its clear capacity to perform a much wider role. ▪ Advice has been sought from Colliers International on an appropriate policy response to Newport Retail Park. Colliers' full reply is set out in the document titled Newport Retail Park Representations – Feb 2013. Policies R6 & R7 of the Deposit LDP are to be deleted and replaced with a new policy that seeks to allow development appropriate to a district centre, and in accordance with Planning Policy Wales, while protecting the vitality and viability of the city centre.
R8 – Non-Retail Uses in District Centres	No representations received
R9 – Small Scale Retail Proposals	1 representation received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Consider Policy to be sound.
Council Recommendations	<ul style="list-style-type: none"> ▪ Noted.
R10 – Change of Use to Non-Retail Uses Outside City and District Centres	No representations received
R11 – New Out of Centre Retail Sites	4 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Out of centre retail development should only be allowed where exceptional need can be demonstrated. ▪ Delete criterion (iv) which seeks to restrict units less than 500 sq m. ▪ Rogerstone does not require any additional retail provision.
Council Recommendations	<ul style="list-style-type: none"> ▪ Current wording of 'need' rather than 'exceptional need' is compliant with Planning Policy Wales. ▪ Agree to remove the restriction on units less than 500 sq m. ▪ The LDP does not allocate any retail development in Rogerstone.
R12 – Development of Existing Out-of-	3 representations received

Centre Retail Sites	
Key Issues Raised	<ul style="list-style-type: none"> ▪ Delete criterion (iv) which seeks to restrict units less than 500 sq m.
Council Recommendations	<ul style="list-style-type: none"> ▪ Agree to remove the restriction on units less than 500 sq m.

Chapter 9 – Community Facilities and Other Infrastructure

	Details
CF1 – Protection of Playing Fields, Land Used for Sport, Recreation and Play	2 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Support for Policy. ▪ Land adjoining Llanmartin Primary School and Waltwood Road are used for recreational purposes and should therefore be protected.
Council Recommendations	<ul style="list-style-type: none"> ▪ Support noted. ▪ Both recreation areas are protected as Environmental Spaces in the Local Development Plan.
CF2 – Protecting Sub Regional Sport and Leisure Facilities	2 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ CF2 as currently worded would prevent any part of the principal use of a site for other uses. ▪ CF2 is a generic policy and should not apply to land within Newport Retail Park.
Council Recommendations	<ul style="list-style-type: none"> ▪ Policy CF2 is to be deleted as merged with Policy CF1 – Protection of Playing Fields, Land Used for Sport, Recreation and Play. ▪ Comments relating to the CF2 allocation are accepted and the leisure allocation at Newport Retail Park.
CF3 – Outdoor Play Space Requirements	1 representation received
Key Issues	<ul style="list-style-type: none"> ▪ Support for Policy.
Council Recommendations	<ul style="list-style-type: none"> ▪ Noted.
CF4 – Water Based	2 representations received

Recreation	
Key Issues Raised	<ul style="list-style-type: none"> ▪ Support for Policy.
Council Recommendations	<ul style="list-style-type: none"> ▪ Noted.
CF5 – Riverfront Access	2 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Support for Policy.
Council Recommendations	<ul style="list-style-type: none"> ▪ Noted.
CF6 – Usk and Sirhowy Valley Walks	1 representation received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Support for Policy.
Council Recommendations	<ul style="list-style-type: none"> ▪ Noted.
CF7 – Allotments	8 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Support for the policy. ▪ The LDP does not allocate new allotments. ▪ The new allotments at Rhiwderin should be protected from development.
Council Recommendations	<ul style="list-style-type: none"> ▪ Support noted. ▪ No additional allotment need has been identified; however, the Plan contains appropriate Policies to assess the provision of new sites that may come forward during the Plan period. ▪ The Rhiwderin Allotments are protected as allotments under Policy CF7 (CF6 in the Revised Deposit Plan).
CF8 – Horse Related Development	2 representations received.
Key Issues Raised	<ul style="list-style-type: none"> ▪ Support for Policy.
Council Recommendations	<ul style="list-style-type: none"> ▪ Support noted.
CF9 – Tourism	3 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Support for policy. ▪ The Policy does not adequately address the wider range of tourism proposal within a rural location.
Council Recommendations	<ul style="list-style-type: none"> ▪ The Plan will be amended to provide further guidance on countryside tourism related development.

CF10 – Celtic Manor	9 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Supporting text should acknowledge the European Protected Species on the site. ▪ Welcome the preparation of a masterplan approach. ▪ The flood zone layer on the Constraints Plan should be updated in relation to Celtic Manor. ▪ Suggest wording amendments to Policy CF10 as it is considered to be too restrictive. ▪ Object to further development at Celtic Manor Resort.
Council Recommendations	<ul style="list-style-type: none"> ▪ Issues relating to European Protected Species are covered elsewhere on the Plan. ▪ Noted. ▪ The Development Advice Maps are produced by the Welsh Government who obtains the data from the Environment Agency. ▪ Some minor wording amendments have been incorporated in the Revised Deposit. ▪ The Masterplan and Policy CF10 aim to ensure that future development is appropriate to Celtic manor's setting.
CF11 – Commercial Leisure Developments	1 representation received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Support for Policy.
Council Recommendations	<ul style="list-style-type: none"> ▪ Noted.
CF12 – Outdoor Leisure Developments	3 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Support for policy. ▪ Additional reference should be made to wider tourism development opportunities in the countryside.
Council Recommendations	<ul style="list-style-type: none"> ▪ Noted. ▪ No changes are considered necessary to Policy CF12, however additional supporting text has been added to CF9 to cover wider tourism development issues.
CF13 – Protection of Existing Community Facilities	4 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Support for Policy.
Council Recommendations	<ul style="list-style-type: none"> ▪ Support is noted. Policy CF13 is to be removed from the Plan and merged with an expanded Policy CF1, to avoid repetition throughout the Plan.
CF14 – Protection of Existing School Sites	1 representation received

Key Issues Raised	<ul style="list-style-type: none"> Policy should cover colleges and universities as well as schools.
Council Recommendations	<ul style="list-style-type: none"> The protection of existing community facilities is adequately covered by Policy CF12 under the definition of community facilities within Policy SP12.
CF15 – School Sites	10 representations received
Key Issues Raised	<ul style="list-style-type: none"> There is no provision for Welsh Medium Secondary Schools in the Plan. Objection to the South of Percoed Lane, Duffryn education allocation as it is situated in a SSSI. The Former Novelis Site (CF15(iii)) is located in the C1 flood zone.
Council Recommendations	<ul style="list-style-type: none"> The Plan sets out a number of school allocations, the exact composition of which will be determined in consultation with the Council's Education Department. Development of the Percoed Lane site would need to meet all the relevant Regulations and Policies relating to development in a SSSI. A Stage 3 SFCA has been carried out and a FCA has been submitted with the outline application for the site.

Chapter 10 - Minerals

	Details
M1 – Safeguarding of Mineral Resource	4 representations received
Key Issues Raised	<ul style="list-style-type: none"> Concern that clarity is required so that the identification of safeguarded areas does not indicate an acceptance of working. Omitted Sand and Gravel resources. The Plan is silent on the matter of its RTS apportionment. More detailed reasoned justification for allowing development clarifying between hardrock and sand & gravel development.
Council Recommendations	<ul style="list-style-type: none"> Provided text to clarify that there isn't an acceptance of working in an area identified as a resource. The most up to date BGS mapping has been used to identify areas of potential resource. The RTS apportionment situation was set out in a background paper but text has been added to ensure the Plan is clear on this issue. Policy text has been updated to reflect the key areas of consideration for this type of development.
M2 – Mineral Development	2 representations received

Key Issues Raised	<ul style="list-style-type: none"> ▪ The policy represents a repeat of national planning policy. ▪ Support of the policy.
Council Recommendations	<ul style="list-style-type: none"> ▪ Policy text has been amended so that it is more specific and not just a repetition of national policy.
M3 – Oil and Gas	2 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Consult BGS mapping for potential resources. ▪ Policy does not add anything from that of national policy. ▪ Unclear why this policy refers to policy M2. ▪ There are some unqualified justifications of environmental risks. ▪ Support of the policy.
Council Recommendations	<ul style="list-style-type: none"> ▪ BGS mapping does not identify resources for oil or gas production. ▪ Agree to remove reference to Policy M2. ▪ The need for operations to be carried out in an environmentally acceptable way is noted in national policy. The text has been amended to provide clarity as to the wider issues for oil and gas production to consider.
M4 – Wharves and Rail	No representations received

Chapter 11 - Waste

	Details
W1 – Waste Site Allocations	20 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Object to the South of Llanwern allocation and reference to Prosiect Gwyrdd. ▪ No evidence that the Council has taken into account the need to consider alternative locations, technologies, cross boundary issues and proposals. ▪ Supporting text should be amended to make specific reference for discharges to avoid entering the SSSI. ▪ Policy is not flexible in terms of allowing other uses if the site is not required for this purpose. ▪ Reference to Best Practicable Environmental Option and aims of the National Waste Strategy should be referred to. ▪ Site is a SINC – development must comply with LDP Policy CE12 and would need a EIA and HRA. ▪ Allocate land at Pye Corner, Nash for an anaerobic Digestion facility.

Council Recommendations	<ul style="list-style-type: none"> ▪ Following a period of detailed tender evaluation the Viridor proposal at trident Park, Cardiff, has been chosen as the preferred facility to provide a waste management solution for the five local authorities making up the Prosiect Gwyrdd partnership. The allocation on land South of Llanwern is to be deleted from the plan to reflect this position. ▪ Prosiect Gwyrdd partnership represents significant cross boundary working on achieving a regional approach to dealing with S E Wales' municipal waste. Alternative sites and technologies have been considered as part of the Prosiect Gwyrdd evaluation and short listing process. ▪ SP21 – addresses the need for waste proposals to be the Best Practicable Environmental Option. ▪ Nature Conservation interests are covered by TAN 5: Nature Conservation and Planning, TAN21: Waste and other policies of the Plan. ▪ A proposal for an anaerobic digester plant on land at Pye Corner would need to overcome a number of constraints prior to it being deemed acceptable. It is therefore not considered appropriate to allocate the site for the suggested purpose.
W2 – Sites for Waste Management Facilities	3 representations were received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Consider Policy to meet the tests of Soundness. ▪ Amount of land required should be 12.6ha minus 4ha identified on Land South of Llanwern. ▪ Policy W2 implies that waste incinerators would be acceptable on any industrial site in the city.
Council Recommendations	<ul style="list-style-type: none"> ▪ The allocation on Land South of Llanwern is to be deleted from the plan to reflect the decision by the member authorities to award the Prosiect Gwyrdd contract to Viridor on a site in Cardiff. The land use requirement figure will therefore remain as 12.6 ha. ▪ Policy Clarification Note Unitary Development Plans – Waste Policies Hazardous Waste Planning Applications (May 2004) sets out the Welsh Government's advice on industrial sites being acceptable locations in principle for in-building waste facilities, subject to detailed assessments.
W3 – Waste Management Proposals	2 representations were received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Refer to meeting requirements of other Plan policies and national guidance. ▪ Delete reference to the Waste Background Paper.
Council Recommendations	<ul style="list-style-type: none"> ▪ Development proposals have to meet other plan policies and national guidance requirement where relevant; there is no need to repeat it throughout the Plan. ▪ The Waste Background Paper sets out detailed information relating to Newport's waste situation and therefore

	provides important background information to the Plan.
W4 – Provision for Waste Management Facilities in Development	1 representation were received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Consider the policy to be sound.
Council Recommendations	<ul style="list-style-type: none"> ▪ Noted.

Chapter 12 – Monitoring Framework

	Details
Para/Section	11 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Clarification requested as to when the trigger will be met, concern that there will be a loss before review. ▪ Omission of an indicator for accessible natural greenspace, water resources and levels of affordable housing. ▪ Concern over what would lead to a review of key policies, need for appropriate trigger points to allow sufficient time to consider and introduce alternatives.
Council Recommendations	<ul style="list-style-type: none"> ▪ The triggers have been worded to ensure triggers are set at an appropriate level, and that a review of the policy will take place to rectify where the problem lies. ▪ An indicator for affordable housing supply has been added. Both natural accessible greenspace and water resources topic areas have an indicator to monitor the affects of the Plan. ▪ The monitoring chapter has been reviewed and amended to allow a review to follow a number of stages assessing the severity of the situation associated with each indicator and recommend an appropriate response.

Chapter 13 – Infrastructure requirement

	Details
	2 representation received
Key Issues Raised	<ul style="list-style-type: none"> ▪ Concern raised as to the level of utility infrastructure required for the scheme at Alcan/Novelis.
Council	<ul style="list-style-type: none"> ▪ The table has been replaced, and the wording reflects the need for developments to provide only what is

Recommendations	required by the development taking into account current capacity levels.
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Chapter 14 - Procedures

	Details
	No representations Received for this Chapter

General Representations

	Details
	13 representations received
Key Issues Raised	<ul style="list-style-type: none"> ▪ The Local Development Plan does not give any consideration to the spatial proposals/policies in adjoining development plans. ▪ General support for the Plan’s overall Strategy.
Council Recommendations	<ul style="list-style-type: none"> ▪ The Council has collaborated on policy matters with regional authorities. Details of cross-boundary work are set out in Chapter 1 – Introduction and Overview.